



REACHING OUTCOMES USING TAILORED EDUCATION & SKILLS

# SAFEGUARDING & CHILD PROTECTION POLICY 2024

<b>Approved by:</b>	Mr Daniel Luford (Director) Mr Nick Lyons (Director)	<b>Date:</b> 01/04/23
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## Statement of intent

At Routes Learning, we promote a strong culture of safeguarding, in order to ensure that the children and young people who attend the service feel safe, that our procedures to protect them are watertight, and that our recruitment processes mean that our tutors and sub-contractors are fully checked and vetted to ensure their suitability. We promote a child-centred and partnership working approach, and this informs all our decision-making. Routes Learning fully recognises its responsibility for safeguarding and child protection.

This policy outlines our framework to ensure that we demonstrate this commitment in line with national safeguarding legislation and local guidance.

### **The aims of this policy are to:**

- Ensure that effective procedures are in place, and communicated effectively, to deal with any safeguarding issues that arise
- Ensure that directors, tutors, sub-contractors and volunteers are suitably trained and fully understand their roles and responsibilities
- Assist directors, tutors, sub-contractors and volunteers to work safely and responsibly and to monitor their own standards and practices
- Ensure that robust monitoring and evaluation arrangements exist in pursuit of these aims

### **Principles underpinning the aims:**

- The welfare of all children and young people who are supported by Routes Learning is paramount
- Routes Learning takes into account the government guidance in KCSiE, the Prevent Duty, and the procedures laid out below in all matters of safeguarding, child protection and safe recruitment
- It is the responsibility of all adults who work with children and young people to safeguard and promote their welfare; under the Prevent Duty, this includes action to identify and safeguard those at risk of being drawn into supporting terrorism. There is also a responsibility to be diligent in the prevention of Female Genital Mutilation (FGM) and forced marriage

- Staff are responsible for their own actions and behaviour, and should avoid any conduct which leads any reasonable person to question their motivation and intentions
- The same professional standards should be applied regardless of culture, gender, language, racial origin, religious belief and/or sexual identity
- Staff should continually monitor and review their own practice

## Roles and responsibilities

All adults working at Routes Learning have an individual responsibility to safeguard and promote the welfare of children and young people by taking appropriate action. This includes taking swift and appropriate action where there are child protection concerns. At Routes Learning, public trust in the teaching profession is promoted and maintained, as outlined in the Teachers Standards ([https://www.gov.uk/government/publications/teachers-standards.](https://www.gov.uk/government/publications/teachers-standards))

The Designated Safeguarding Lead (DSL) at Routes Learning is Dan Luford. As required by KCSiE, the DSL takes lead responsibility for safeguarding and child protection (including online safety and the Prevent duty). He is supported in his duties by one Deputy Safeguarding Lead (DDSL), Nick Lyons. They will undertake child protection and safeguarding training at least every two years, and commit to updating their knowledge and skills regularly, by attending relevant meetings and training, and keeping up to date with local and national safeguarding developments.

### The role of the Directors includes the following:

- To ensure that all appropriate policies are in place which together define how an effective safeguarding culture and child protection procedures are established, and confirm that Routes Learning's safeguarding arrangements take into account the procedures and practices of the Local Authority (LA) as part of the contractual agreement of service between the LA and Routes Learning
- To implement and communicate these policies and to ensure the outcomes are monitored.
- To ensure that appropriate arrangements are in place for the Single Central Record (SCR) and that the SCR is scrutinised
- To be responsible for reviewing and amending the policy as appropriate

- To undertake training and reading as required by this policy
- To work in a way that is attentive to safe working practices, as illustrated in the publication  
'Guidance for safer working practice for those working with children and young people in education settings'
- To supervise tutors regularly, ensuring that they are aware of their roles and responsibilities, and that they have support, coaching and training to promote the safeguarding of children and young people and to allow for confidential discussion of sensitive issues
- To ensure that appropriate procedures to handle allegations are in place
- To ensure that appropriate disciplinary procedures are in place

### The role of the DSL includes the following:

- To support and advice to all staff on matters of child welfare, safeguarding (including online and digital safety) and child protection matters
- To be available during the working day until 7pm to support staff and to discuss and advise on safeguarding concerns
- To liaise with directors, the DDSL and tutors and other relevant parties regularly to ensure effective safeguarding outcomes and to share important information as appropriate, and to ensure effective safeguarding outcomes
- To liaise with appropriate safeguarding bodies as required
- To take part in strategy discussions and inter-agency meetings, contributing to the assessment of children and young people, and/or support tutors to do so
- To manage referrals to relevant bodies such as the local authority, the Disclosure and Barring Service and the Police
- To ensure safeguarding and child protection records and files are updated and stored appropriately, and only accessed by those who need to do so
- To liaise with the Local Authority Designated Officer (LADO) for child protection issues concerning tutors
- To ensure that all information is recorded, used and shared in accordance with the directives in KCSiE, including understanding the Data Protection Act (2018) and UK GDPR

- To promote supportive engagement with parents and carers in safeguarding and promoting the welfare of children and young people, including where families may be facing challenging circumstances
- To be responsible for the induction and training of Routes Learning staff, ensuring that each tutor has access to and understands safeguarding policies and procedures. This includes ensuring that every member of staff at Routes Learning has confirmed they have read Part one/[Annex A of the current KCSiE](#), and a summary of any changes
- To ensure that Routes Learning's safeguarding policy is shared with parents, so that they are aware that Routes may make referrals for suspected cases of neglect or abuse
- To promote a culture of trust, communication and listening to children and young people, taking their wishes and feelings into account, ensuring that they understand how to keep themselves safe
- To ensure Routes Learning complies appropriately with the Prevent Duty in accordance with guidance issued by the government

The full role of the DSL is outlined in KCSiE, annex C. Additionally, the DSL has responsibility for the Single Central Record (SCR) of Routes Learning.

### Responsibilities of tutors and sub-contractors providing tutoring services:

- To abide by the principles in the Routes Learning safeguarding policy and code of conduct. All tutors are reminded that they are in a 'position of trust' (under Section 16 of the Sexual Offences Act 2003) and must avoid any behaviour that could be construed as an abuse of trust
- To attend safeguarding training on induction and as required. They must read part one of the current KCSiE
- To provide a child-centred and coordinated approach to safeguarding at all times, considering the best interests of children and young people, keeping them at the centre of decision making. They should maintain an attitude of 'it could happen here' at all times
- To work in a way that is attentive to safe working practices, as illustrated in the publication ['Guidance for safer working practice for those working with children and young people in education settings'](#)
- To be alert to the signs of mental and physical harm, abuse and neglect. They should report any concerns immediately to the DSL or Deputy DSL

using the agreed procedures. If in any doubt, staff should consult with the DSL. The same applies to any concerns relating to the Prevent Duty

- To raise concerns and suspicions immediately with the DSL or deputy. This is because other staff may not be fully apprised of all safeguarding concerns around a child or young person, as the DSL may have additional information pertaining to them and their care: it is the DSL who can see the full picture of concerns around a child or young person
- Any tutors may be asked to attend a Child Protection conference for which they should provide a report. Tutors involved will be helped by the DSL to provide relevant information. Attendance may similarly be required at other meetings including Child In Need (CIN), Team Around the Child (TAC) and Team Around the Family (TAF)
- To take appropriate opportunities to cover safeguarding issues in their sessions, to ensure that children and young people understand how to keep themselves safe, and what they should do if they have any concerns
- When taking children and young people out in the community, to plan sessions taking existing risk assessments into account and conducting dynamic risk assessments
- When working at the Hub, to ensure that all equipment is used safely and that children and young people are fully supervised, particularly when working in the kitchen
- To ensure that the vehicle they use to transport children and young people is safe and well-maintained, and fully insured for business use

## Procedure if a child discloses a safeguarding issue to a tutor

### The tutor will:

- Listen to the child or young person and will try not to show shock by what is being said
- Not ask a child or young person to remove or adjust their clothing to observe bruises or other injuries – it is only acceptable to observe such things on show
- Allow the child or young person to set a pace if a disclosure is made. Avoid pressing pupils for details or leading the child or young person (for example, avoid closed questions such as: “what did they do next?” or “where did they touch you?”)



- Listen, do not investigate. The tutor will use open prompts such as “yes”, “mmm”. It can be helpful to use TED as a way of remembering appropriate open questions: “Tell me; Explain; Describe”
- Accept what the child or young person says and be careful not to burden them with guilt by asking questions such as “why didn’t you tell me before?”
- Acknowledge how hard it was for the child or young person to tell them
- Not criticise the perpetrator - this may be someone they love
- Not promise confidentiality, but will reassure the pupil that they have done the right thing and will explain in an age-appropriate way whom they will have to tell (the DSL) and why. The tutor will not make promises that they cannot keep, such as “I’ll stay with you all the time” or “it will be alright now”

## Multi-agency working

Routes Learning is committed to, and contributes to, multi-agency working as part of its statutory duty. Routes Learning is aware of and will follow the local safeguarding arrangements outlined by Pan Dorset Safeguarding Children’s Partnership. We will work with Children’s Social Care Services (CSCS), the police, health services and other agencies to protect and promote the welfare of our children and young people, through the Early Help process and by contributing to multi-agency plans to provide and access additional support.

Where a need for Early Help is identified, Routes Learning will allow access for CSCS from the host LA and, where appropriate, a placing LA, for that LA to conduct (or consider whether to conduct) a section 17 or 47 assessment.

Routes Learning also recognises the particular importance of inter-agency working in identifying and preventing CSE/CCE. Routes Learning adheres to the PDSCP guidance: <https://pdscp.co.uk/working-with-children/schools-and-colleges/bournemouth-christchurch-poole/>

## Information sharing

Routes Learning recognises the importance of proactive information

sharing between professionals and local agencies in order to effectively manage children and young people's needs and identify any need for Early Help.

In consideration of the above, Tutors will be aware that the UK GDPR and Data Protection Act (2018) places a duty on Routes Learning 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 a C or YP being placed at risk of harm. Tutors will ensure that any fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of children and young people. If tutors are in doubt about sharing information, they will speak to the DSL or DDSL.

## Early Help

Early Help is intervening as soon as possible to provide support for young people as soon as a problem emerges, at any point in a child or young person's life, in order to achieve the best outcomes for them. Early Help is for pre-birth to age 19 (up to 25 if a young adult has identified Special Educational Needs and/or disabilities). It allows help to be put in place at the right time to meet families' needs prior to reaching crisis point, drawing on the families' own skills and promoting self-reliance. Everyone who works with children, young people and their families has a role to play in identifying concerns, sharing information and taking prompt action.

The DSL will take the lead where Early Help is appropriate. This includes liaising with other agencies and setting up any inter-agency assessments as appropriate. Tutors may be required to support other agencies and professionals in an Early Help assessment. Routes Learning will keep these cases under review and refer to CSCS if the child/young person's situation is not improving, or is worsening.

Any child may benefit from early help, but all tutors should be particularly alert to the potential need for Early Help for a child who:

- Is disabled and has specific additional needs

- Has special educational needs (whether or not they have a statutory education, health and care plan)
- Is a young carer
- Is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- Is frequently missing or goes missing from care or from home
- Is misusing drugs or alcohol themselves
- Is at risk of modern slavery, trafficking, or exploitation
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
- Has returned home to their family from care
- Is showing early signs of abuse and/or neglect
- Is at risk of being radicalised or exploited
- Is a privately fostered child
- Is persistently missing from education, including sessions with Routes Learning

## What is child abuse?

There are four main forms of abuse which are: physical abuse, emotional abuse, sexual abuse and neglect. These are described in [Annex A of KCSiE](#). Signs of child abuse should be carefully recorded and discussed with the DSL. It is accepted that in all forms of abuse there are elements of emotional abuse, and that some children are subjected to more than one form of abuse at any one time. In most cases multiple issues will overlap with one another. Abuse can also include witnessing the ill treatment of others (for example, witnessing domestic abuse).

It is essential that everyone at Routes Learning knows the signs of child abuse and neglect and, if they have any concerns about a child's welfare, they should act on them immediately, using the correct procedures to safeguard the child. They must be aware that they have a statutory responsibility to report any signs of child abuse.

Abuse, neglect and other safeguarding issues are rarely standalone events, and multiple issues can overlap with one another. Therefore, tutors must err on the side of caution, be vigilant and always raise concerns with the DSL or DDSL. Safeguarding incidents can happen outside Routes Learning and can include

child-on-child abuse or in situations outside the family home (extra-familial harms)

The dangers to children from criminal and sexual exploitation (including “County Lines”), radicalisation, forced marriage and FGM have been highlighted in recent years to add to the host of physical and mental dangers of abuse to which vulnerable children have always been subjected.

Technology is a significant component in many safeguarding and wellbeing issues and includes online abuse, cyberbullying and the sharing of indecent images.

Tutors will be familiar with the numerous tools and sources of support that can be accessed through the PDSCP website:

<https://pdscp.co.uk/working-with-children/child-neglect/neglect-assessment-toolkit/>.

## Child-on-child abuse (including sexual harassment and sexual violence)

[KCSiE part 5](#) deals with child-on-child sexual harassment, abuse, and violence. All tutors and directors should be aware of these issues and will consult this detailed guidance if and when dealing with such an incident.

Child-on-child abuse can be manifested in many ways, including:

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying
- Abuse in intimate personal relationships between peers
- Physical abuse – this may include an online element which facilitates, threatens and/or encourages physical abuse
- Sexual violence – this may include an online element which facilitates, threatens and/or encourages sexual violence
- Sexual harassment, including online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent
- The consensual and non-consensual sharing of nude and semi-nude images and/or videos
- Up skirting (please see further discussion below)

- Initiation and hazing-type violence and rituals, which can include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element

All child-on-child abuse and sexual harassment is unacceptable and will be taken seriously: all adults working with children are required to maintain an attitude of 'it could happen here'. Whatever the response to incidents of harassment between children, it should be underpinned by the principle that sexual violence and harassment is never acceptable and will not be tolerated. This attitude must permeate the whole culture at Routes Learning.

Any concerns about inappropriate behaviour, comments or incidents must be reported promptly to the DSL. Adults must not dismiss worrying behaviour as "normal", "just banter", or "part of growing up". They must be sensitive to language used between young people. This includes such abuse and harassment undertaken online.

The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. As always, when concerned about the welfare of a child, all adults should act in the best interests of the child. Immediate consideration should be given as to how best to support and protect the victim and the alleged perpetrator. The nature of the concerns will determine whether the DSL involves MASH and/or the police.

The fact that a child may be lesbian, gay, bi, or trans (LGBT) is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. Tutors, therefore, endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns.

All tutors will be aware of the heightened vulnerability of young people with SEND, who evidence suggests are more likely to be abused than their peers. Tutors will always have professional curiosity regarding possible indicators of abuse and never automatically assume that these relate to the young people's SEND, and will explore any concerns with an open and

enquiring mind.

All concerns are recorded using the Cause for Concern form, and the DSL informed immediately.

## Domestic abuse

Domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. For the purposes of this policy, and in line with the [Domestic Abuse Act 2021](#), “domestic abuse” is defined as abusive behaviour of a person towards another person (including conduct directed at someone else, e.g., the person’s child) where both are aged 16 or over and are personally connected.

“Abusive behaviour” includes physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological or emotional abuse, or another form of abuse. “Personally connected” includes people who:

- Are, have been, or have agreed to be married to each other
- Are, have been, or have agreed to be in a civil partnership with each other.
- Are, or have been, in an intimate personal relationship with each other.
- Each have, or had, a parental relationship towards the same child.
- Are relatives.

Routes Learning will recognise the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of domestic abuse. All tutors will be aware of the signs of domestic abuse and follow the appropriate safeguarding procedures where concerns arise. They can also refer to PDSCP [Domestic Abuse Toolkit](#).

Where a Multi-Agency Risk Assessment Conference (MARAC) occurs, Routes Learning may be asked for information and appropriate data may be shared after the meeting.

## Child Exploitation including County Lines

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

CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media. CSE can affect any child who has been coerced into engaging in sexual activities. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship. Further guidance can be obtained from 'Child Sexual Exploitation Definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation' can be useful when considering cases of CSE [here](#).

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. Children can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others. Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others.

Further information about CSE, CCE and County Lines can be found in [KCSiE Annex B](#).

All tutors must be aware of indicators which may signal that children are at risk from, or are involved in, serious violent crime including being used in the sale and transport of drugs 'County Lines'.

If schools are concerned a child is being exploited in this way, procedures set out in this document will be followed and reference will be made to [local guidance provided by the PAN Dorset Safeguarding Partnership](#).

### Signs of CCE that tutors must be aware of:

- 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.

### Signs of CSE that tutors must be aware of:

- Appearing with unexplained gifts, money, or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly missing academy/nursery or education or not taking part.
- Having older boyfriends or girlfriends.
- Suffering from sexually transmitted infections.
- Displaying sexual behaviours beyond expected sexual development.
- Becoming pregnant.



## Modern slavery

Modern Slavery encompasses human trafficking and slavery, servitude, and forced or compulsory labour. This can include CCE, CSE, and other forms of exploitation. All tutors will be aware of and alert to the signs that a young person may be the victim of modern slavery. Tutors will also be aware of the support available to victims of modern slavery and how to refer them to the [National Referral Mechanism](#).

Where CCE or CSE, or the risk of it, is suspected, tutors will discuss the case with the DSL. If, after discussion, a concern remains, local safeguarding procedures will be triggered, including referral to the LA. The LA and all other necessary authorities will then handle the matter to conclusion. Routes Learning will cooperate as needed.

## Online safety and personal electronic devices

Routes Learning recognises the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues. To address this, Routes Learning aims to have robust processes in place to ensure the online safety of children and young people.

Routes Learning's approach to online safety is based on addressing the following categories of risk, as described in KCSiE:

- **Content:** being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism
- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and

semi-nudes and/or pornography), sharing other explicit images and online bullying

- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

There may be occasions when tutors with Routes Learning use the internet for teaching and learning purposes. On these occasions, young people will always be supervised by a tutor when accessing the internet at the Hub, to minimise the risk of exposure to inappropriate material.

Where possible, tutors will discuss with children and young people how to keep themselves online, and will be alert to attitudes and behaviours which might indicate that they are at risk of harm online. Tutors will follow the protocol for reporting safeguarding concerns, as described in this document, for all concerns about online behaviour.

Routes Learning will carry out an annual review of its approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by young people.

The use of personal electronic devices, including mobile phones and cameras, by tutors and young people is closely monitored by Routes Learning. Tutors may bring their personal phones to work for their own use, and for use in an emergency. However, they will limit use of personal phones to non-contact time when young people are not present. Tutors' personal phones will remain in their bags, cupboards, or other safe place during contact time with young people.

Tutors will not take pictures or recordings of young people on their personal phones or cameras. Any photographs or videos of young people will be recorded using company cameras and devices; these must be for academic evidential purposes or for public display purposes. If any images are used for public display, for example, for publication on social media, explicit parental consent will be sought prior to use. The General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in Routes Learning.

If a child or young person is using their phone in an unacceptable way, tutors can end the session. This might include the child or young person contacting a friend by phone during the session, accessing inappropriate material or filming or taking pictures of the tutor. Education about the appropriate and safe use of mobile technology may be included in tutoring sessions.

## The sharing of indecent images or messages

Routes learning will ensure that tutors will treat the sharing of indecent images, including through 'sexting', as a safeguarding concern, and these concerns will be reported through the usual protocol as outlined in this policy.

We refer to the DfE guidance: Advice and Guidance for Schools on Sharing nudes and Semi-nudes and Sharing nudes and semi nudes - responding to an incident.

Tutors will receive understand the difference between sexual behaviour that is considered normal and expected for the age of the young person, and sexual behaviour that is inappropriate and harmful.

Tutors will be aware that creating, possessing, and distributing indecent imagery of children is a criminal offence, regardless of whether the imagery is created, possessed, and distributed by the individual depicted; however, tutors will ensure that young people are not unnecessarily criminalised. The sharing of sexualised text messages that are brought to the attention of Routes Learning will be managed at the discretion of the DSL but will nearly always involve additional interventions to support and protect, and may involve parents being alerted to the content and additional risks posed. Where a tutor becomes aware of an incidence that involves indecent images of a young person, they will refer this to the DSL as soon as possible.

Where a young person confides in a tutor about the circulation of indecent

imagery, depicting them or someone else, the tutor will:

- Report the incident to the DSL
- Refrain from viewing, copy, printing, sharing, storing or saving the imagery (as this is also a criminal offence)
- Tell the DSL immediately if they accidentally view an indecent image and seek support, reporting the occurrence on the cause for concern form.
- Explain to the young person that the incident will need to be reported.
- Respond positively to the young people without blaming or shaming anyone involved, and reassuring them that they can receive support from the DSL.

The DSL will attempt to understand what the image contains **without viewing it** and the context surrounding its creation and distribution – they will categorise the incident into one of two categories:

- **Aggravated:** incidents which involve additional or abusive elements beyond the creation and distribution of indecent images of young people, including where there is an adult involved, where there is an intent to harm the young person depicted, or where the images are used recklessly.
- **Experimental:** incidents involving the creation and distribution of indecent images of young people where there is no adult involvement or apparent intent to cause harm or embarrassment to the young people.

Where the incident is categorised as ‘aggravated’, the situation will be managed in line with this policy. Where the incident is categorised as ‘experimental’, the young people involved will be supported to understand the implications of sharing indecent imagery and to move forward from the incident. Where there is reason to believe that indecent imagery being circulated will cause harm to a young person, the DSL will escalate the incident to CSCS. Where indecent imagery of a young person has been shared publicly, the DSL will work with the young person to report the imagery to sites on which it has been shared, and will reassure them of the support available.

The DSL will only view the imagery if absolutely necessary, in the following

circumstances:

- It is the only way to decide about whether to involve other agencies and it is not possible to establish the facts through discussion with the young person
- It is necessary to report the image to a website or app in order to have it taken down
- The image is on Routes Learning's network or device and needs to be deleted.

Where it is necessary to view the image, the DSL must never copy, print, share or store it. This is illegal. If this has happened, the directors must inform the police for advice and to explain the circumstances. The viewing should be undertaken by the DSL or an adult with delegated responsibility, and should take place with another adult (who should not view the image) in the room, on Routes Learning premises. Ideally the person who views the image should be of the same sex as the young person. The decision to view the imagery must be recorded clearly, along with who was also present, why the decision to view was taken, and any subsequent actions.

## Female Genital Mutilation (FGM)

The guidance [Multi-agency Statutory Guidance on Female Genital Mutilation](#) was published in April 2016 to ensure teachers abide by their statutory duty to safeguard children and young people at risk of so-called "honour-based" violence, including female genital mutilation and forced marriage.

All tutors and adults working at Routes Learning must report any cases of known FGM to the police, as their mandatory duty; they are also expected to report cases of girls they believe are at risk of undergoing the procedure, as prevention is critical. If anyone at Routes Learning suspects that there is a risk that FGM may be going to take place, this should be discussed with MASH/CHAD. Tutors failing to report cases of FGM may face disciplinary action.

If they suspect a case of FGM, tutors must not physically examine young people, but must instead be aware of the signs, and heightened risk factors of FGM, which are outlined in the Equalities Office [fact sheet](#). This describes the different types of FGM including long-term effects and signs to look out for which indicate that a girl may have recently undergone the procedure.

## Forced marriage

Forcing someone to marry against their will is a criminal offence. Legislation also makes forcing a UK national into marriage outside the UK an offence under domestic law. 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 into a marriage. These can be physical, emotional or psychological.

The government's Forced Marriages Unit has published [guidelines](#) for those working in education, health and social services. The guidelines point out that teachers are often ideally placed to spot early signs that a pupil may be about to be forced into marriage. These guidelines include warning signals. All adults working at Routes Learning will create an environment in which pupils feel able to talk about any concerns.

Tutors who have any concerns regarding a young person who may have undergone, is currently undergoing, or is at risk of forced marriage will speak to the DSL and local safeguarding procedures will be followed – this could include referral to CSCS, the police or the Forced Marriage Unit: 020 7008 0151 or [fm@fcdo.gov.uk](mailto:fm@fcdo.gov.uk).

## 'Honour-based' abuse (HBA)

HBA is a crime or incident which has or may have been committed to protect or defend the honour of the family and/or community. It does not have to be violent to be abusive. It can exist in all communities and cultures and occurs when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code. Females are predominantly, but not exclusively, the victims and the violence is often committed with some degree of approval and/or collusion from family or community members. Staff who have a concern that a child is at risk from HBA should speak to their Designated Safeguarding Lead.

## Radicalisation

Under section 26 of the Counter-Terrorism and Security Act 2015, all schools are subject to a duty to have “due regard to the need to prevent people from being drawn into terrorism”. This is known as the Prevent Duty. Routes Learning will have due regard to the need to prevent people from

being drawn into extremist behaviour. Extremism refers to the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and the mutual respect and tolerance of different faiths and beliefs. Extremism also includes calling for the death of members of the armed forces. Protecting children and young people from radicalisation (the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups) is part of Routes Learning's wider safeguarding approach.

As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Concerns should be shared with the DSL.

Routes Learning will actively assess the risk of children or young people being radicalised and drawn into extreme behaviour or terrorism. Tutors, who are in a key position to engage with families, will be alert to signs of radicalisation. They may spot changes in young people's behaviour which could indicate that they need help or protection, as outlined in the [Prevent Duty guidance](#).

The government website: [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a young person is being radicalised can include the following things:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use

- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook/Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist groups

If a tutor is concerned that a young person is at risk of being radicalised, the [Pan Dorset Safeguarding Children's Partnership's guidance on Prevent](#) will be followed. It may be that concerns are sufficient to require a Prevent referral. Prevent referrals may be passed to a multi-agency Channel panel (Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism).

The DSL will ensure that all adults working for Routes Learning will undertake Prevent training, to enable them to identify children/young people at risk of being drawn into terrorism and to challenge extremist ideas. This training is available at: <https://www.elearning.prevent.homeoffice.gov.uk/edu/screen1.html>. The Department for Education also has a dedicated telephone helpline, 020 7340 7264 (email: [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk)), which can be contacted to raise concerns about extremism with respect to a child/young person. In an emergency, where someone may be in immediate danger, someone may be planning to travel to join an extremist group, or for concerns which pose immediate risks to public safety, 999, or the confidential anti-terrorist hotline (0800 789321) must be called.

## Mental Health

Routes Learning ensures that mental health is a prominent concern and area of discussion, and prioritises support for all children or young people. Tutors will ensure that any concerns are passed on to DSL, who will decide on the appropriate course of action. If a mental health problem is believed to require the intervention of a trained medical professional, parents will be signposted to their GP, CAMHS or other appropriate services.



Tutors are made aware that mental health problems can be an indicator that a child or young person has suffered, or is at risk of suffering abuse, neglect or exploitation. They should also be aware that children or young people with SEND are at significantly higher risk of a mental health condition than the neurotypical population.

## Reporting concerns about children and young people

All concerns about a child or young person's welfare will be acted on as soon as possible. Tutors must use the Cause for Concern form and communicate the concern to the DSL or DDSL, who will decide on the next course of action. Decisions are reviewed regularly by the directors for quality assurance, training, development and to ensure that the appropriate action has been taken and collectively agreed.

The LA will decide what action is required within one working day of the referral being made and will notify the referrer. Routes Learning will monitor and follow up referrals if there is a lack of information about what has been done to support the child or young person. If the situation does not improve after a referral, the DSL will ask for reconsideration to ensure that concerns have been fully addressed and that the situation improves for the child or young person.

## Children and young people potentially at greater risk of harm

Routes Learning recognises that some groups of young people can face additional safeguarding challenges and understands that further barriers may exist when determining abuse and neglect in these groups of children and young people. Additional considerations for managing safeguarding concerns and incidents amongst these groups are outlined below:

- Young people who need social workers
- Looked After Children (LAC) and Previously Looked After Children (PLAC). Routes Learning will ensure that tutors have appropriate information regarding the legal looked after status of the children/young people they work with, including the care

arrangements, contact details for carers, and contact details of social workers

- Children/young people with SEND (with or without EHCPs)

Through training, tutors will be made aware of the indicators which may signal a child or young person is at risk from, or is involved with serious violent crime. These indicators include:

- Increased absence from school
- 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
- Being male
- Having been frequently absent from school
- Having been permanently excluded from school
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery.

Tutors who suspect a young people may be vulnerable to, or involved in, serious violent crime will immediately report their concerns to the DSL.

## Children and young people with family members in prison

Children and young people with a family member in prison (where this is known) will be offered support as necessary. Where appropriate, they will receive a copy of [‘Are you a young person with a family member in prison?’](#) from Action for Prisoners’ Families. They will have the opportunity to discuss questions and concerns.

## Children and young people required to give evidence in court

Children and young people who are required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support. Where appropriate, they will be provided with the booklet '[Going to Court and Being a Witness](#)' from HMCTS. Routes Learning will liaise with parents and other professionals throughout the process and may also provide a 'trusted adult' to also attend the court when requested by the child and young person and/or family.

## 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 CSCS where a child or young person 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.

## Privately arranged homestays and private fostering

Where a parent or young person arranges their own homestay, this is a private arrangement and Routes Learning is not the regulated activity provider.

Where a period of UK homestay lasts 28 days or more for a child aged under 16, or under 18 for a child with SEND, this may amount to private fostering under the Children Act (1989). Where Routes Learning becomes aware of a young person being privately fostered, they will notify the LA as soon as possible to allow them to conduct any necessary checks.

## Protocol for home visits and tutoring in the home

Tutoring may take place at a child or young person's home, according to their individual needs. Tutors should make directors aware of any home visits. Contact details for both the tutor and the family being visited will be readily available, so that support for any difficulties can be provided.

If appropriate, tutors should liaise with colleagues in order to familiarise themselves with relevant background information about the setting. They should also be fully acquainted with the location of a child or young person's home and how to get there.

If tutors have any anxieties on arriving at a location, and feel that their safety may be jeopardised, they should not take the risk of proceeding further. Alternative arrangements should be made. Confrontation should always be avoided. At the first sign of potential danger, tutors should make a speedy exit from the home, and should never assume that violence would not happen to them – personal safety is paramount. Any incidents should be reported to the directors immediately. Tutors are reminded to keep up-to-date with current legislation regarding safer working practices.

When tutoring in the home, tutors are expected to:

- Always wear an identity badge
- Demonstrate normal courtesy, for example, by waiting to be invited into the home
- Check that an adult is present within the home – if there is no adult present, do not enter. Tutors should ensure that a responsible adult is within nearby when working alone with a child or young person
- Show respect for parents and carers, and families, as equal partners in the relationship

- Take care that physical proximity to a child cannot be misinterpreted
- Make appointments in advance and offer a choice of times
- Accept families' rights not to want a home visit
- Check parents'/carers' names and titles, not assuming that there are two parents with the same surname as the child, or that the surname of the parent is the same as the child
- Not assume that all parents/carers are literate
- Consider issues of social, cultural and religious differences, and behave sensitively towards these
- Record details of home visits using the Routes Learning reporting system

It is useful that a risk assessment for tutoring sessions taking place in the home is carried out to identify any concerns and to put appropriate measures into place. If risks at a child or young person's home are identified, every effort should be made to communicate with the parents/carers to find a way forward. Where possible, sessions should take place at the Routes Learning Hub.

## Transportation of children and young people

Tutors will need to use their own personal vehicles when working with young people, and will be required to have suitable business insurance as part of their policy. Evidence of this will be presented to Routes Learning following recruitment, along with their UK Driving Licence.

Tutors may be working with young people in the community, and will be required to transport them during sessions to risk-assessed locations.

Tutors should only transport the young people they have been commissioned to work with in their vehicles; any other passengers are not allowed access to the tutor's vehicle (e.g. friends of the child or young person). Failing to comply with this will trigger a safeguarding investigation.

## Missing children and young people

A child going missing from a session is a potential indicator of neglect, abuse or harm. Any absences, foreseen or unforeseen, should be communicated to the directors and DSL. Routes Learning will inform the LA of any children or young people who fail to attend regularly, or have been absent without permission from Routes Learning for a continuous period of 5 sessions.

If a child/young person goes missing during a tutoring session, every effort is made to find and return them to effective supervision as soon as possible. Tutors will:

- Ensure that the directors are informed immediately, so that parents/carers can be contacted
- Consider calling the police, according to the young person's needs and the severity of the situation
- Keep the child or young person in sight for as long as possible, if safe to do so
- Immediately inform the directors or DSL if/when the child or young person is located
- Make a note of what the child or young person was wearing, and any medical needs, in case a police missing persons procedure is triggered

Tutors should have a charged mobile phone on their person for all sessions, particularly those that take place in the community. Directors or the DSL should make tutors aware if there is a high risk of a child or young person going missing, so that a suitable risk assessment and choice of location/activity can be decided.

If the parent/carer is not present at pick up or drop off from the session, where this has been arranged, tutors should stay with the child or young person and contact the parent/carer if they are not at home.

## Community safety incidents

All tutors will be alert to any community safety incidents in the vicinity of Routes Learning (for example, child abduction attempts) and will be vigilant to risks such as unknown adults loitering nearby, or attempting to converse with children and young people.

Children and young people will be briefed about personal safety when attending sessions in the community.

## Identifying the behaviours of a sexual abuse perpetrator

It is important that all staff are aware of the signs to look out for in identifying someone who may be sexually abusing or exploiting a child. This person could be a parent, volunteer, staff member or another child.

Behaviours may include:

- Overly exaggerated behaviours
- Being overly friendly with children or young people
- Overly generous
- Always isolating a child
- Having favourites, or favouring certain looks (e.g. blonde girls or dark haired boys)
- Taking photographs of children on their mobile phone
- Ready excuses when behaviour is challenged
- Distort the power of secrets
- Targeting the vulnerable
- Lap sitting
- Romping and wrestling
- Taking certain children on exciting trips
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Tickling games
- Humiliating children or young people

Abusers may also groom the parent or carer of a child in order to build trust, which can be over many years. Abusers are patient, often very plausible and charming individuals and the least likely person you would expect. They may

have an air of authority, with a high opinion of themselves and boast about their “great works”.

If anyone at Routes Learning feels uncomfortable about the way an adult relates to children or suspects that somebody may be an abuser, they should inform the DSL immediately. It is also useful to write down any and all such behaviours in order to have a written record.

## Allegations of abuse against Routes Learning staff

Routes Learning ensures that all staff have an awareness of safer working practices which minimise the risk of allegations being made against them. It promotes a safe working environment that allows Tutors and Mentors to work with their young people on a 1:1 basis in a range of settings that aims to protect young people and staff at all times.

Routes Learning’s policy for dealing with allegations of abuse against a member of staff follows the guidance given in [KCSiE Part Four](#). We recognise that some allegations relate to behaviour, which meets the ‘harms threshold’ whilst others do not, but still require consideration as ‘low level concerns’.

Routes Learning aims to deal with all concerns in a timely manner, in a fair and consistent way that provides effective child protection, while also supporting the individual who is the subject of the allegation. If we are in any doubt as to whether a concern meets the harm threshold, we will consult the LADO.

Part 4 of KCSiE recognises that an individual’s behaviour outside of school might make them unsuitable to work with children.

Please refer to Routes Learning Managing Allegations Policy for further information regarding procedures.

## Safer recruitment and the Single Central Record (SCR)

To make sure suitable people are recruited as Tutors and Mentors, Routes Learning will ensure they follow the latest guidance outlined in the Safer Recruitment and all those in process will receive the appropriate training.

Please refer to Routes Learning Safer Recruitment Policy for further information regarding procedures.



