



# Safeguarding Policy



## Background

APPLA tuition is a non-statutory organisation that became a limited company in 2017. Safeguarding and promoting the welfare of children and young people who access our tutoring services is paramount in all the work we do and in all the decisions we take. All APPLA policies and procedures should be understood in this context. We recognise the right of all children and young people, regardless of any 'protected characteristics', to grow and develop in circumstances where they feel safe and supported, so that they can achieve optimal outcomes throughout their childhood, their teenage years and into adulthood.

Our team of carefully selected tutors provide friendly, quality tuition that is tailored to each individual student. We know that a small amount of support can make a huge difference to the lives of our students - now and in the future - and we work hard to deliver a service which is geared towards boosting confidence and boosting grades.

APPLA tuition tutors work with individuals on a one-to-one basis as well as in small groups. We have supported students in home and school environments since 2017. We became an accredited and approved Tuition Partner for the Department for Education's National Tutoring Programme in 2021. In the same year we delivered in excess of 5000 hours of tuition and reached more than 700 students.

## The purpose and scope of this policy

APPLA tuition are committed to safeguarding, protecting, and promoting the welfare of children and young people that access our tutoring services

This policy describes how to identify safeguarding concerns, share information, and take prompt action to protect children and young people that access our tutoring service.

## Roles and Responsibility

In England, the Department for Education is responsible specifically for child protection. Effective safeguarding arrangements are underpinned by the key principle that safeguarding is everyone's responsibility. This policy applies to anyone working on behalf of APPLA tuition, including senior managers, paid staff, volunteers, sessional workers, agency staff and students.

The managing director, Anthony Lloyd, is the designated Safeguarding Lead for APPLA tuition. The role of the DSL includes:

- Lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place)
- Being readily available to discuss any safeguarding issues/concerns with members of the team
- Managing referrals
- Raise awareness of safeguarding
- awareness of the schools' safeguarding policies
- liaison with the schools' safeguarding officers regarding any concerns/issues
- To be trained in the knowledge and skills required to carry out the role (level 3)
- To renew training every 2 years
- Keeping up to date with safeguarding developments
- Providing safeguarding training to APPLA representatives

## References

This policy is based on legislation, policy and guidance that seeks to protect children in England, including:

- The Children Act (1989 and 2004)
- Working Together to Safeguard Children 2018
- The Children and Social Work Act (2017)
- The United Nations convention on the Rights of the Child (1992)
- The Equality Act (2010)
- The Children and Families Act (2014)
- The Human Rights Act (1998)
- What to do if you're worried a child is being abused: guidance from Department for Education (2015)
- NSPCC website
- Education and Training (Welfare of Children) Act 2021
- Keeping Children Safe in Education
- Providing remote education: guidance for schools (DfE)
- Domestic Abuse Act (2021)
- NTP Safer Recruitment and Safeguarding Policy for Tuition Partners
- Gov.UK website
- Prevent Duty (DfE 2015)
- Data Protection Act 2018
- The Mental Capacity Act 2005

This policy statement should be read alongside other related documents, including:

- Keeping Children Safe in Education guidance (part 1)
- Information policy document
- Recruitment policy document
- Whistleblowing policy document
- Code of Conduct poster

### Recruitment and induction of staff

APPLA tuition are committed to a fair recruitment and selection process that safeguards the students that we tutor and promotes the provision of quality tuition. All representatives of APPLA tuition are required to provide a Disclosure and Barring Service check (DBS) enhanced with child barred list check, which is free from any convictions, cautions, reprimands, and warnings. DBS checks are completed annually for everyone.

There is a recruitment process (see recruitment policy) that ensures individuals are carefully selected, understand their safeguarding responsibility to users of the APPLA tuition service and sign up to the Safeguarding policy.

### Safeguarding training and updates

Our designated safeguarding lead (DSL) is required to have enhanced safeguarding certification (level 3) and renew their training every 2 years. The DSL keeps up to date with emerging DfE guidance on safeguarding and child protection issues. They contact tutors with any updates, via email but would host face-to-face meetings and emergency training courses if they felt it was a necessary response to new information. They provide safeguarding training to all staff which covers the following areas:

- effective safeguarding practices for tuition (including online and face-to-face tuition)
- how/when to report an incident
- How to make an allegation (Whistleblowing)
- how to comply with our safeguarding policy
- who key members of safeguarding staff are/chain of command.
- Code of Conduct
- Prevent training <https://www.support-people-vulnerable-to-radicalisation.service.gov.uk/>.

All staff are required to take part in mandatory safeguarding training, when they join us, as well as yearly refresher courses. Tutors are required to sign against this policy and any updates to policy.

Staff who wish to take further qualifications (e.g., enhanced safeguarding) are encouraged to do so as part of their personal development.

## Ongoing Evaluation of Safeguarding

There is a Safeguarding log managed by the Designated Safeguarding Lead, that records any concerns and action taken. This log is regularly reviewed by the management team.

Safeguarding is continually reviewed with quarterly safeguarding summits set in the calendar for March, June, and December and an annual safeguarding audit in September.

The Risk register identifies potential risks to the service (including safeguarding risks) and appropriate controls and mitigations. The risk register is regularly reviewed and updated to include any risks identified during management processes. There are quarterly reviews of the risk register set in the calendar for February, May, August, and November.

All tutors are required to sign an annual declaration regarding safeguarding responsibilities. The Dates and records of screening checks/ DBS audits, training and acknowledgement and agreement of all APPLA policy and code of conduct are recorded on a Single Central register.

## Online Safety

As part of our services, APPLA delivers online face to face tuition to students. The Account Manager will seek reassurance from schools that they have appropriate filtering and monitoring on school devices and school networks. APPLA lessons are delivered through a safe online platform and all lessons are recorded and stored in line with Data Protection Regulations.

The parents/guardians/carers of students must sign consent forms for online tuition to take place. The consent forms outline safe learning conditions that must be provided by the parent/guardian/carer and permission to record and store videos from online sessions.

The Management team perform safeguarding spot checks of lesson recordings regularly, (a minimum of 1 session per Tutor per term) for the following safeguarding risks to students:

content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.

contact: being subjected to harmful online interaction with other users; for example: 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: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and nonconsensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and

commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If the Management team felt that any pupil, student or staff was at risk they would report this to the Anti-Phishing Working Group (<https://apwg.org/>)

Any concerns regarding online safety should be reported to the designated Safeguarding Lead, Anthony Lloyd.

## Protecting Children and Young People

### We believe that:

- Children and young people should never experience abuse of any kind
- We have a responsibility to promote the welfare of all children and young people, to keep them safe and to practise in a way that protects them.

### We recognise that:

- the welfare of children and young people is paramount in all the work we do and in all the decisions we take
- all children, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation have an equal right to protection from all types of harm or abuse
- some children are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues
- working in partnership with children, young people, their parents, carers and other agencies are essential in promoting young people's welfare

### We will seek to keep children and young people safe by:

- valuing, listening to and respecting them
- recruiting and selecting APPLA representatives and volunteers safely, ensuring all necessary checks are made
- ensuring that all APPLA representatives and volunteers are aware of and sign up to the Safeguarding Policy
- recording, storing and using information professionally and securely, in line with data protection legislation and guidance
- taking all concerns and allegations of poor practice or abuse seriously and responding swiftly and appropriately
- reporting any safeguarding concerns to the appropriate authorities
- reporting any low-level concerns regarding a colleague to the designated safeguarding lead



## Children with special educational needs, disabilities or health issues

Children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. Additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- communication barriers and difficulties in managing or reporting these challenges
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

Any reports of abuse involving children with SEND will therefore require close liaison with the designated safeguarding lead and the SENCO or the named person with oversight for SEND in a college/school.

## Recognising Child Protection Concerns

### Abuse

The Working Together to Safeguard Children document defines abuse as:

“A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children”.

Typically abuse can be either one of, or a combination of these four categories: (*appendix 1*)

- Physical
- Sexual
- Emotional
- Neglect

The NSPCC outlines the common signs of child abuse as:

- Unexplained changes in behaviour or personality.
- Becoming withdrawn.
- Seeming anxious.
- Becoming uncharacteristically aggressive.
- Lacks social skills and has few friends, if any.
- Poor bond or relationship with a parent.
- Knowledge of adult issues inappropriate for their age.
- Running away or going missing.
- Always choosing to wear clothes which cover their body.

For more information, you can visit the NSPCC website.

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, deliberately missing education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk. Below are some safeguarding issues all staff should be aware of.

### Domestic Abuse

The Domestic Abuse Act 2021 recognises the impact of domestic abuse on children. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Domestic abuse captures a range of abusive behaviours including physical, emotional, and economic abuse and coercive and controlling behaviour. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

### Child on Child Abuse including Child-on-child sexual violence and sexual harassment

The Keeping Children Safe in Education guidance explains in detail how children can abuse other children (often referred to as child-on-child abuse), it can happen both inside and outside of school or college and online. All APPLA representatives working with children are advised to maintain an attitude of “it could happen here”. Sexual violence and sexual harassment can occur between two or more children of any age and sex, from primary through to secondary stage and into college. It can occur also through a group of children sexually assaulting or sexually harassing a single child or group of children. It is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. Children with special educational needs and disabilities (SEND) are



also three times more likely to be abused than their peers. Victims will be assured that they are being taken seriously and that they will be supported and kept safe.

A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment, nor should a victim ever be made to feel ashamed for making a report.

As with any child under 18 any safety or welfare concerns should be reported to the Designated Safeguarding Lead who will follow safeguarding procedures and where appropriate pass a concern to local authority children's social care and/or the police.

It is essential that everyone understands the importance of challenging inappropriate behaviours between children, many of which are listed below, that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Child-on-child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying) abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence) Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive.
- sexual harassment, such as sexual comments, remarks, jokes, and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- challenging physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts.
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)

- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
- initiation/hazing type violence and rituals (this could 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)

### Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

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

### Child Criminal Exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing. They can also be forced or manipulated into committing vehicle 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.

As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

## Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet. CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge for example 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. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited for example they believe they are in a genuine romantic relationship.

## Mental Health

Everyone should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Any concerns should be reported to the safeguarding lead.

## Serious violence

All staff should be aware of the indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include increased absence from school or college, a change in friendships or relationships with older individuals or groups, a significant decline in educational performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

## Prevent Duty

In order to fulfil our Prevent Duty to prevent people being drawn into terrorism (Section 26 of the Counterterrorism and Security Act 2015), it is essential that we are able to identify children who may be vulnerable to radicalisation. General safeguarding principles apply to keeping children safe from the risk of radicalisation and is similar in nature to protecting children from other harms (e.g., drugs, gangs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences. (The Prevent duty Departmental advice for schools and childcare providers).

Any safeguarding concerns should be reported to the designated safeguarding lead (DSL). Appropriate authorities will be notified by the DSL.

### Female Genital Mutilation (FGM)

FGM is illegal in the UK. It is a practice which takes place worldwide in at least 30 countries in Africa, Asia and the Middle East. It also takes place within parts of Western Europe and other developed countries, primarily among immigrant and refugee communities.

FGM has been classified by the World Health Organization into 4 types; these are described in more detail on the World Health Organisation website.

FGM is a complex issue - despite the harm it causes, some women and men from affected communities consider it to be normal to protect their daughters and their cultural identity. (Gov.UK)

Any concerns about female genital mutilation (FGM) on a girl under the age of 18, should be reported immediately to the designated safeguarding lead (or a deputy). These concerns will be reported to the police.

### Low Level Concerns

The Keeping Children Safe in Education guidance describes low level concerns as a sense of unease or a 'nagging doubt' relating to a colleague. The adult may have acted in a way that is inconsistent with the Code of Conduct including inappropriate conduct outside of work, that is not serious enough to consider a referral to the Local Authority Designated Officer (LADO). Examples of such behaviour could include but are not limited to:

- Being over friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to one basis in a secluded area or behind a closed door
- Using inappropriate sexualised, intimidating, or offensive language

### To report a concern

If you think someone is at **immediate risk** of abuse or harm:

- contact either the police on 999 or call the children's social care team at the Local Authority: Warrington 01925 443322 or 01925 444 400 (out of hours)
- Alternatively, call the NSPCC 24-hour safeguarding line on 0808 800 5000
- Report any actions taken with regard to child safeguarding to our Designated Safeguarding Lead (DSL), Anthony Lloyd on 07375 411 248 as soon as is reasonably practicable within 24 hours.

If you have concerns about a child who is **not** at immediate risk of abuse or harm:

- Contact our Designated Safeguarding Lead (DSL), Anthony Lloyd, as soon as possible, to discuss the nature of your concern on 07375 411 248 or email him, [anthony@appla.co.uk](mailto:anthony@appla.co.uk)
- Or contact the children's social care team at the Local Authority if you wish to bypass the DSL with your concern: Warrington Borough Council- 01925 443 322

If you have a concern regarding a colleague harming or posing a risk of harm to children, then Contact our Designated Safeguarding Lead (DSL), Anthony Lloyd, as soon as possible, to discuss the nature of your concern on 07375 411 248 or email him, [anthony@appla.co.uk](mailto:anthony@appla.co.uk)

If you have a safeguarding concern regarding the DSL, contact the Local Authority Designated Officer of the children's social care team: Warrington Borough Council- 01925 443 322

If you have any doubts or concerns about safeguarding, contact Anthony Lloyd immediately.  
If you have a general concern about the safeguarding policy: Email APPLA tuition at [office@appla.co.uk](mailto:office@appla.co.uk)

### Record Keeping

All concerns, discussions and decisions made, and the reasons for those decisions, are recorded in the safeguarding log. The log records how the concern was followed up and resolved and notes any action taken and the outcome. Information is kept confidential and stored securely by the designated safeguarding lead as per the 'Information policy'. The safeguarding log is regularly reviewed by the management team and lessons learned are shared with everyone and forms part of continuing improvement processes.

Low level concerns regarding colleagues will be recorded on the individual's personnel record, investigated by the management team and if appropriate, disciplinary action taken. More serious concerns are recorded as per the Whistleblowing and Management of Serious Allegations policy.

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused by other children or adults, in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

**Physical abuse** may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

**Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only in so far as they meet the needs of another person
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

**Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether the child is aware of what is happening. The activities may involve:

- Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of

sexual abuse, as can other children.

**Neglect** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate caregivers)
- Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.



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