

Swale Tutoring Service Ltd

Safeguarding and Child Protection Policy

Aligned with KCSiE 2026 and Working Together to Safeguard Children 2023*v2.0 — 24/08/2026 — full revision against KCSiE 2026 and KCC minimum standards; for DSL review & signature*

Version control

Version	Date	Author	Notes
1.0	07/06/2026	Swale Tutoring Service	Initial draft — TEMPLATE for review
1.2	15/08/2026	Swale Tutoring Service	Deputy DSL appointed (Warren Wilson); DSL email corrected
2.0	24/08/2026	Warren Wilson, Deputy DSL	Full revision against KCSiE 2026, KSCMP procedures and KCC minimum standards: adult safeguarding, MCA & DoLS, child trafficking, children missing, governance & assurance, DSL/Deputy escalation route, whistleblowing & complaints cross-references

1. Statement of intent

Swale Tutoring Service Ltd is committed to safeguarding and promoting the welfare of all children and young people we work with. Safeguarding is everyone's responsibility. This policy applies to every person working for, with, or on behalf of Swale, including the Director, Designated Safeguarding Lead, all tutors, contractors, and any volunteers.

We recognise that the children we work with — typically those funded under Education, Health and Care Plans (EHCPs), often with complex needs including autism, social, emotional and mental health needs, anxiety, school refusal, or having experienced exclusion — may be particularly vulnerable. Our standard of care reflects this.

This policy is informed by Keeping Children Safe in Education (KCSiE) 2025, Working Together to Safeguard Children 2023, the Children Acts 1989 and 2004, the Education Acts 1996 and 2002, the Care Act 2014, the Mental Capacity Act 2005, and the procedures of the Kent Safeguarding Children Multi-Agency Partnership (KSCMP) and the Kent and Medway Safeguarding Adults Board.

2. Scope

This policy applies to:

- All staff (Director, employed staff, self-employed contractors, volunteers)
- All children and young people receiving tuition or related services from Swale
- Young people aged 16 and over, and adult learners aged 18 and over, including adults at risk, to whom the adult safeguarding, Mental Capacity Act and Deprivation of Liberty Safeguards provisions of this policy also apply (sections 4.6 and 4.7)
- All settings in which Swale delivers, primarily pupils' homes, but also community venues, online sessions, and any future Swale premises
- All contact with parents, carers, schools, local authorities, and other professionals

3. Roles and responsibilities

3.1 Designated Safeguarding Lead (DSL)

The DSL has lead responsibility for safeguarding and child protection. The DSL:

- Holds current Level 3 safeguarding training, refreshed at least every two years
- Is the first point of contact for any safeguarding concern raised by a tutor, parent, child or third party
- Decides on referrals to children's social care or the police
- Liaises with the LADO for any allegation against a member of staff
- Maintains accurate, contemporaneous records of safeguarding concerns and actions
- Reviews this policy annually

Current DSL for Swale Tutoring Service:

Name: Shelley Wilson | Role: Director and DSL | Phone: 07938 225538 | Email: shelly@swaletutoring.co.uk | Level 3 training completed: 02/06/2026 | Next refresher due: 01/06/2028

3.2 Deputy DSL

A Deputy DSL is named in case the DSL is unavailable. The Deputy holds the same level of training.

Name: Warren Wilson | Role: Deputy DSL & Business Manager | Phone: 01227 915027 | Email: office@swaletutoring.co.uk | Level 3 training completed: 16/08/2026 | Next refresher due: 15/08/2028

3.3 All staff

Every person working with Swale has a duty to safeguard the children we work with. Every staff member must:

- Read Part 1 of KCSiE (2026) before beginning work, and annually thereafter, and sign to confirm they have done so
- Complete safeguarding training appropriate to their role, refreshed annually
- Complete Prevent duty training
- Know how to recognise, respond to, record, and report a safeguarding concern
- Know who the DSL is and how to contact them
- Act in the best interests of the child at all times

Every member of staff, tutor, contractor and volunteer is accountable to the Designated Safeguarding Lead and Deputy DSL, the organisation's named safeguarding persons, for the discharge of these safeguarding responsibilities.

3.4 Director and governance

The Director has ultimate accountability for safeguarding within Swale. The Director ensures the DSL has the time, training and authority to fulfil their role; that this policy is reviewed annually; that safer recruitment is followed; and that the Single Central Record is maintained and audited.

3.5 Governance and assurance

Safeguarding is governed at director level. The following arrangements are in place:

- **Job descriptions:** lead responsibility for safeguarding is written into the job description of each named safeguarding person, the Director & DSL and the Deputy DSL & Business Manager (see the DSL and Deputy DSL Role Descriptions, which form part of each postholder's role).
- **Regular senior-management discussion:** safeguarding is a standing item at the monthly senior management meeting (the Director and the Deputy DSL), covering organisational development and service delivery as well as any concerns arising. Discussions are minuted, actions are logged with an owner and a date, and completion is reviewed at the next meeting.
- **Safeguarding development plan:** senior management maintain an annual Safeguarding Development Plan setting out safeguarding actions for the year (training, vetting, audits, policy reviews). It is reviewed at the monthly meeting and refreshed annually alongside this policy.
- **Dedicated and proportionate resources:** safeguarding is resourced with two accredited Level 3 trained safeguarding leads (the Director & DSL and the Deputy DSL), protected time for safeguarding duties, a budget for accredited training, and access to external specialist advice. Safeguarding takes precedence over commercial considerations, including the unrestricted right to decline or end a placement on safeguarding grounds.
- **Embedding across contracted delivery:** all teaching is delivered by tutors engaged directly under written terms that require compliance with this policy; every tutor completes safeguarding induction and annual KCSiE Part 1 sign-off before delivery, is vetted and recorded on the Single Central Record, and reports session-level information to the DSL. Swale does not delegate or sub-contract its safeguarding responsibilities.

4. Types of abuse and specific safeguarding issues

Staff must be alert to the following categories of abuse and the indicators associated with each. This list is not exhaustive - see KCSiE 2026 Part 1 and Annex B for full guidance.

4.1 Categories of abuse

- Physical abuse
- Emotional abuse
- Sexual abuse and sexual exploitation
- Neglect
- Peer-on-peer / child-on-child abuse, including sexual violence and harassment
- Online abuse — including grooming, sharing nude or semi-nude images, cyberbullying

4.2 Specific issues

- Child sexual exploitation (CSE)
- Child criminal exploitation (CCE), including county lines
- Female genital mutilation (FGM), mandatory reporting duty
- Forced marriage and so-called 'honour'-based abuse
- Radicalisation and Prevent duty
- Mental health and self-harm
- Domestic abuse
- Child trafficking and modern slavery (see 4.4)
- Children missing from education, home or care (see 4.5)
- Substance misuse
- Online safety risks, particularly relevant given home-based delivery and pupils' independent online lives

4.3 Special considerations for our pupils

Our pupils are often:

- EHCP-funded with complex SEND and may have difficulty communicating concerns verbally
- Out of mainstream education and therefore have fewer trusted adults seeing them regularly
- Spending significant unsupervised time online
- In some cases, in homes where there are additional family stressors

Staff must be especially alert to behavioural changes, withdrawal, regression, or comments that may indicate concern, and must not dismiss these because of the pupil's SEND.

4.4 Child trafficking and modern slavery

Child trafficking is child abuse: the recruitment or movement of a child for exploitation (sexual or criminal exploitation, domestic servitude, forced labour), and a form of modern slavery. Trafficked and exploited children often do not see themselves as victims. Indicators include unexplained money or possessions, going missing, vague or scripted accounts of living arrangements, and adults controlling a child's movements. Any concern that a child may be trafficked or exploited is reported to the DSL immediately and referred to the Kent Integrated Front Door and, where a crime may be in progress, the police; referral into the National Referral Mechanism (NRM) is made through the police or children's social care as first responders.

4.5 Children missing from education, home or care

A child going missing, from education, home or care, is a potential indicator of abuse, neglect or exploitation, including sexual and criminal exploitation and trafficking. Because our pupils are mostly out of mainstream education already, a missed session is a more significant signal than it would be in school: tutors follow up any unexplained absence and report it to the DSL and the commissioning

caseworker the same day, and repeated or unexplained absence triggers a review (see the Attendance and Non-Attendance Policy). For children in care, any information that a child is missing from their placement is passed immediately to the DSL, who informs the carer, the child's social worker and Virtual School Kent, and the police where the child's whereabouts are unknown.

4.6 Safeguarding adults at risk (learners aged 16 and over)

Some Swale learners are aged 16 or over, and some continue beyond 18 (for example completing GCSE or Functional Skills courses). An adult at risk is a person aged 18 or over who has needs for care and support, is experiencing or at risk of abuse or neglect, and because of those needs cannot protect themselves (Care Act 2014). Many of our older learners, having EHC Plans and needs such as autism or social, emotional and mental health difficulties, would meet this definition.

- The recognising, responding, recording and reporting duties in this policy apply to adults at risk exactly as they apply to children.
- **Exploitation of adults at risk with a disability:** staff are alert to the particular risks of exploitation faced by adults with a learning disability or other additional needs, financial exploitation, 'mate crime', coercion into criminal activity, sexual exploitation and online exploitation and raise any concern with the DSL exactly as they would a child protection concern.
- **Reporting:** safeguarding referrals for an adult at risk are made by the DSL to Kent Adult Social Care on 03000 41 61 61 (out of hours 03000 41 91 91; social.services@kent.gov.uk), or 999 where the person is in immediate danger.

4.7 Mental Capacity Act (16+) and Deprivation of Liberty Safeguards (18+)

For learners aged 16 and over, consideration of the Mental Capacity Act 2005 is an integral part of relevant decision-making and of our safeguarding processes. We presume capacity; we support learners to make their own decisions, communicating in ways adjusted to their needs; we do not treat an unwise decision as evidence of incapacity; and where a learner lacks capacity for a specific decision, that decision is made in their best interests, involving parents, carers and the professionals around the learner, and recorded. In our context this applies chiefly to consent — to participation, to information sharing and to safeguarding referrals — and capacity is considered decision by decision, never as a blanket judgement.

For learners aged 18 and over, consideration of the Deprivation of Liberty Safeguards forms an integral part of the same decision-making. Swale never restricts or deprives any learner of their liberty: we use no physical intervention or restraint, no locked environments and no restrictions on movement. If a tutor becomes concerned that arrangements in a learner's home or placement may amount to an unauthorised deprivation of liberty, this is reported to the DSL, who seeks advice from Kent Adult Social Care.

Detailed guidance on several of the areas above is set out in separate Swale policies which form part of this safeguarding framework: the Anti-Bullying Policy (including bullying via social networking sites), Online Safety Policy, Child-on-Child Abuse Policy, Self-Harm Policy, Prevent Duty Policy, Whistleblowing Policy, Complaints Policy and the Attendance and Non-Attendance Policy.

5. Recognising, responding to and reporting concerns

5.1 Recognising

Concerns can arise from:

- Direct disclosure by a child
- Observed signs (injuries, behaviour, demeanour, language)
- Comments by parents, siblings, or third parties
- Allegations made about a member of staff
- Information from another agency

5.2 Responding to a disclosure

If a child discloses abuse or you become concerned about a child's welfare:

1. Listen carefully. Do not interrupt. Take the child seriously.
2. Reassure but do not promise confidentiality. Tell the child what you will do next.
3. Do not ask leading questions. Use open prompts ('Can you tell me more about that?').
4. Do not investigate. Your role is to receive information and pass it on.
5. Record exactly what was said using the child's own words, as soon as possible after the disclosure, on the Swale Safeguarding Concern Form. Sign and date the record.
6. Contact the DSL by phone the same day. Follow up in writing within 24 hours.

5.3 Reporting routes

All concerns are reported to the DSL in the first instance. The DSL decides on the next step, which may include:

- Recording the concern and continuing to monitor
- Discussion with the parent (only where appropriate and not where this would put the child at greater risk)
- Referral to KCC's Front Door (Integrated Children's Services) for assessment
- Referral to police where a crime may have been committed
- Liaison with the child's school (where applicable) and the EHCP caseworker

Every concern, whatever the outcome, is recorded on the Swale Safeguarding Concern Form and logged on the Safeguarding Concerns Register maintained by the DSL.

5.4 Escalation — DSL unavailable, both unavailable, or disagreement

If the DSL is unavailable, contact the Deputy DSL. If you have raised a concern and believe it is not being acted upon, you may escalate directly to KCC's Front Door without further internal approval. You will not be penalised for doing so in good faith.

If the Designated Safeguarding Lead and the Deputy DSL are both unavailable, do not wait. Where a child may be at risk of significant harm, contact the Kent Integrated Front Door directly on 03000 41 11 11 (out of hours 03000 41 91 91), or call 999 if a child is in immediate danger. For an adult at risk, contact Kent Adult Social Care on 03000 41 61 61 (out of hours 03000 41 91 91). Record the concern the same day on the Safeguarding Concern Form and notify the DSL as soon as they are contactable. An allegation against a member of staff or a contractor is referred directly to the Kent LADO on 03000 410 888.

6. Key external contacts

Service	Contact
KCC Front Door (Integrated Children's Services)	03000 41 11 11 (office hours); 03000 41 91 91 (out of hours) — frontdoor@kent.gov.uk
Medway Children's Social Care (pupil resident in Medway)	01634 334 466 (office hours); 03000 41 91 91 (out of hours)
KCC LADO (allegations against staff)	03000 410 888 — kentchildrenslado@kent.gov.uk
KCC Adult Social Care (adults at risk)	03000 41 61 61 (office hours); 03000 41 91 91 (out of hours) — social.services@kent.gov.uk
Police (emergency)	999
Police (non-emergency)	101

Service	Contact
NSPCC helpline	0808 800 5000
Childline	0800 1111
FGM mandatory reporting (police)	101 or 999 if imminent risk
Prevent — KCC referral	preventreferrals@kent.gov.uk
Anti-Terrorist Hotline	0800 789 321

7. Confidentiality and information sharing

Information about safeguarding concerns is shared only with those who need to know. Confidentiality cannot be promised to a child making a disclosure. Information may be shared without consent where this is necessary to protect a child from harm.

Information sharing follows the Data Protection Act 2018, UK GDPR, and the government's Information Sharing Advice for Safeguarding Practitioners (July 2018, updated).

8. Record keeping

All safeguarding records are:

- Made contemporaneously using the child's own words where applicable
- Factual, signed, and dated
- Stored securely, separately from general pupil records, with restricted access (DSL and Deputy DSL only)
- Retained until the pupil's 25th birthday, then reviewed for retention or secure disposal
- Transferred to receiving organisations where a pupil moves on (e.g. to a school) using secure means

9. Allegations against staff

Any allegation that a member of staff (including the Director, tutors, contractors, or volunteers) has behaved in a way that has harmed, may have harmed, or might harm a child is reported to the KCC LADO within one working day. This includes situations where an individual's conduct in their personal life may indicate that their behaviour could be a risk of harm to the children they work with — for example, perpetrators of domestic violence, or neglect or abuse of their own children or of vulnerable adults. An allegation concerning the Director/DSL herself is reported to the Deputy DSL, or directly to the Kent LADO, by any member of staff, parent or professional — the DSL takes no part in receiving, assessing or investigating an allegation made against her. See the separate Allegations Management Policy for the full procedure.

9.1 Whistleblowing

Any member of staff who believes a safeguarding concern is not being taken seriously, or whose concern involves the DSL, a director or a manager, may raise it under the Swale Whistleblowing Policy, which sets out protected routes including direct referral to external agencies (KCC Front Door, the Kent LADO, Ofsted, and the NSPCC whistleblowing advice line on 0800 028 0285). No one will suffer any detriment for raising a genuine concern in good faith.

9.2 Complaints

Parents, carers, pupils and commissioners may raise concerns about our service under the Swale Complaints Policy, published on our website. A complaint that discloses a safeguarding concern is passed to the DSL immediately and handled under this policy first; the complaints procedure never delays a safeguarding referral.

10. Low-level concerns

In line with KCSiE 2026 Part 4, low-level concerns (behaviours by staff that fall below the threshold of an allegation but are inconsistent with the Code of Conduct) are also recorded and reviewed by the DSL. This creates an open culture and helps identify patterns early.

11. Working in pupil homes

Most Swale tuition is delivered in pupils' homes. This carries specific safeguarding considerations that are addressed in detail in the Lone Working Policy and the Tutor Handbook. Key principles:

- A parent or responsible adult must be present in the home during sessions, unless explicitly agreed otherwise in writing
- Sessions take place in shared rooms where possible, not bedrooms
- Tutors do not transport pupils in their own vehicles unless prior written agreement is in place
- Tutors check in and out of each session via a documented protocol
- Any safeguarding concerns arising in the home environment (e.g. evidence of neglect, domestic abuse, substance misuse) are reported via the standard route

12. Safer recruitment

Swale follows safer recruitment principles:

- Enhanced DBS with Children's Barred List check for every adult working with pupils, prior to first session
- DBS Update Service subscription preferred to keep checks current
- Two references for every tutor, at least one from most recent employer or engager
- Verification of identity, right to work, and qualifications
- Prohibition from teaching check (Teaching Regulation Agency) for anyone delivering as a teacher
- Single Central Record maintained and audited monthly
- Person responsible for hiring (currently the Director) holds a current safer recruitment qualification

13. Training

All staff receive safeguarding training appropriate to their role:

- KCSiE Part 1 — read and signed for by every staff member annually
- Safeguarding training — minimum every 2 years, recorded on the Training Log
- Prevent duty training — at induction and every 3 years thereafter
- Online safety awareness
- DSL Level 3 training every 2 years for the DSL and Deputy DSL
- Training is recorded on the Training Log and its effectiveness reviewed at the monthly senior management safeguarding meeting; what is learned shapes the next year's training in the Safeguarding Development Plan
- Learning from national and local safeguarding developments — including published Serious Case Reviews, Safeguarding Adult Reviews, Domestic Homicide Reviews and KSCMP guidance and bulletins — is considered at the monthly senior management safeguarding meeting, disseminated to the delivery team, and acted upon

14. Review

14.1 Review record — August 2026

This version (v2.0) was reviewed against: Keeping Children Safe in Education 2026 (in force 24 August 2026); Working Together to Safeguard Children 2023; Kent Safeguarding Children Multi-Agency Partnership (KSCMP) procedures and current Kent reporting routes (Integrated Front Door, LADO, Kent Adult Social Care); the Care Act 2014; the Mental Capacity Act 2005 and the Deprivation of Liberty Safeguards; and Kent County Council's minimum safeguarding standards for commissioned providers.

The review was carried out by appropriately trained individuals:

- **Warren Wilson — Deputy DSL & Business Manager.** Accredited Designated Safeguarding Lead Level 3 (High Speed Training, completed 16/08/2026, certificate T-5160105-6174432, KCSiE-2026 current; refresher due 15/08/2028). Carried out the drafting review and gap analysis against the standards above.

- **Shelley Wilson — Director & Designated Safeguarding Lead.** Accredited Designated Safeguarding Lead Level 3 (High Speed Training, completed 02/06/2026, KCSiE-2026 current; refresher due 01/06/2028); qualified teacher with 26 years' practice supporting children with special educational needs. Reviewed and approved this policy — signature below.

Both training certificates are held on file and are available on request.

Review and approval

This policy is reviewed annually or sooner if legislation, KCSiE guidance, or operational circumstances change. Reviewed by the Director and Designated Safeguarding Lead. Date of next review:

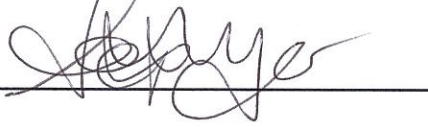
24/08/2027

Approved and adopted by:

Shelley Wilson

Capacity: Sole Director of Swale Tutoring Service Ltd (governance approval) and Designated Safeguarding Lead (safeguarding review)

Signature:



Date:

24 / 08 / 2026

Reviewed by:

Warren Wilson, Deputy DSL & Business Manager

Signature:



Date:

24 / 08 / 2026