



**CAMBRIDGE TUTORS**

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Child Protection &  
Safeguarding Handbook

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## INTRODUCTION

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### **Our pledge**

Cambridge Tutors provides services to nurture students' academic and intellectual growth.

These activities bring our employees, self-employed tutors and support staff into contact with children, whether at our offices, students' homes, online or elsewhere. We believe that it is our responsibility to ensure that children are protected from any type of abuse, and that their welfare and wellbeing is the first concern when dealing with safeguarding issues.

In this *Child Protection and Safeguarding Handbook*, we have set out our policies for safeguarding to protect children and young people, to ensure that our tutoring is always conducted in a positive, secure, accepting and nurturing environment.

We are committed to reviewing our policy and good practice annually.

This policy was last reviewed on 9<sup>th</sup> August 2019.

Signed:   
David Gibbon, Director

# SAFEGUARDING POLICY STATEMENT

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## The purpose and scope of this policy statement

Cambridge Tutors works with children and families as part of its activities. These include:

- one-to-one tutoring in person and online
- group tutorials
- courses and conferences

The purpose of this policy statement is:

- to protect children and young people who receive services from Cambridge Tutors. This includes the children of adults who use our services
- to provide parents, staff and volunteers with the overarching principles that guide our approach to child protection

This policy statement applies to anyone working on behalf of Cambridge Tutors, including Directors and Managers, paid staff, volunteers, contractors, sessional workers and students.

## Legal framework

This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect children in England. A summary of the key legislation and guidance is available from <https://learning.nspcc.org.uk/child-protection-system/england/>.

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 the child is paramount
- all children, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation have a right to equal 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 is essential in promoting young people's welfare

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

- valuing, listening to and respecting them
- appointing a nominated child protection/safeguarding lead, a deputy child protection/safeguarding lead and a Director for safeguarding
- developing child protection and safeguarding policies and procedures which reflect best practice
- using our safeguarding procedures to share concerns and relevant information with agencies who need to know, and involving children, young people, parents, families and carers appropriately
- creating and maintaining an anti-bullying environment and ensuring that we have a policy and procedure to help us deal effectively with any bullying that does arise
- developing and implementing an effective online safety policy and related procedures
- sharing information about child protection and safeguarding best practice with children, their families, staff and volunteers
- recruiting staff and volunteers safely, ensuring all necessary checks are made
- providing effective management for staff and volunteers through supervision, support, training and quality assurance measures
- implementing a code of conduct for staff and volunteers
- using our procedures to manage any allegations against staff and volunteers appropriately
- ensuring that we have effective complaints and whistleblowing measures in place
- ensuring that we provide a safe physical environment for our children, young people, staff and volunteers, by applying health and safety measures in accordance with the law and regulatory guidance
- recording and storing information professionally and securely

## **Related policies and procedures**

This policy statement should be read alongside the organisational policies and procedures outlined below, including:

- Procedures for responding to concerns about a child or young person's wellbeing
- Dealing with allegations of abuse against a child or young person
- Role of the designated safeguarding officer
- Managing allegations against staff and volunteers
- Code of conduct for adults
- Anti-bullying policy and procedures
- Online safety policy and procedures for responding to concerns about online abuse
- Photography and image sharing guidance
- Child protection records retention and storage policy

## KEY DEFINITIONS AND LEGAL CONCERNS

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### Legal background

The practices and procedures within this policy are based on the principles contained within UK legislation and Government Guidance and have been developed to complement Strategic Partnership Board policy and procedures.

They take into consideration:

- Human Rights Act of 1998
- Children Act 1989
- Sexual Offences Act of 2003
- Children Act 2004
- Serious Crime Act 2015
- Working Together to Safeguard Children 2018
- Keeping Children Safe in Education 2018
- Data Protection Act of 2018

### Definitions

- *Child* — In England, Northern Ireland and Wales a child is someone under the age of eighteen whether living with their families, in state care, or living independently (Working Together to Safeguard Children 2018).
- *Safeguarding and promoting the welfare of children* — Protecting children from maltreatment, preventing harm to children's health or development, ensuring children grow up with the provision of safe and effective care, and taking action to enable children to have the best outcomes.
- *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 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. They may be abused by an adult or adults or by another child or children.
- *Poor practice* — When an adult's or another young person's behaviour is inappropriate and may be causing distress to a child or young person, or any behaviour which contravenes the principles of this document. Where poor practice is serious or repeated this could also constitute abuse and should be reported immediately. Unacceptable examples include:
  - use of excessive, physical or humiliating punishments
  - failure to act when you witness possible abuse or bullying
  - spending excessive amounts of time alone with young people away from others
  - whilst not engaged in tutoring inviting or allowing a young people into your home where they will be alone with you
  - engaging in rough, physical or sexually provocative activity
  - allowing young people to use inappropriate language unchallenged
  - making sexually suggestive comments even in fun
  - reducing a person to tears as a form of control
  - allowing allegations made by a young person to go unchallenged, unrecorded or not acted upon
  - doing things of a personal nature for young people that they can do for themselves

- *Safeguarding concern* — Any situation when there is information that a child or an adult at risk has been harmed, or is at risk of being harmed, by their own or someone else's behaviour.
- *Safeguarding allegation* — If the information identifies the involvement of an employee or self-employed tutor of Cambridge Tutors this will be known as a 'safeguarding allegation'. This will apply where a person in connection with Cambridge tutors has:
  - behaved in a way that has harmed a child, may have harmed a child, or behaved in a way that might lead to a child being harmed
  - possibly committed or is planning to commit a criminal offence against a child or related to a child
  - behaved towards a child in a way that indicates they are, or would be, unsuitable to work with children

## CODE OF CONDUCT FOR ADULTS

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Cambridge Tutors must remain vigilant to keep those children who may be at risk of abuse safe from harm. They must recognize if a child is being harmed or is in danger of being harmed or neglected; respond in an appropriate way to what they observe or are told, report any concerns to the Designated Safeguarding Lead or Deputy, and record any incidents precisely and completely.

### **Purpose**

This behaviour code outlines the conduct Cambridge Tutors expects from all our staff and volunteers. This includes agency staff, interns, students on work placement and anyone who is undertaking specific duties for the organisation, whether paid or unpaid.

The behaviour code aims to help us protect children and young people from abuse and reduce the possibility of unfounded allegations being made. It has been informed by the views of children and young people.

### **The role of staff and volunteers**

When working with or for children and young people, you are acting in a position of trust. You are likely to be seen as a role model and must act appropriately.

### *Responsibility*

You are responsible for:

- prioritising the welfare of children and young people
- providing a safe environment for children and young people.
  - This includes ensuring equipment is used safely and for its intended purpose; and
  - having good awareness of issues to do with safeguarding and child protection and taking action when appropriate.
- following our principles, policies and procedures.
  - This includes policies and procedures for child protection/safeguarding, whistleblowing and online safety.
- staying within the law at all times
- modelling good behaviour for children and young people to follow
- challenging all unacceptable behaviour and reporting any breaches of the behaviour code to David Gibbon
- reporting all allegations/suspicions of abuse following our reporting procedures
  - This includes abusive behaviour being displayed by an adult or child and directed at anybody of any age.



## *Rights*

You should:

- treat children and young people fairly and without prejudice or discrimination
- understand that children and young people are individuals with individual needs
- respect differences in gender, sexual orientation, culture, race, ethnicity, disability and religious belief systems between yourself and others, and appreciate that all participants bring something valuable and different to the group/organisation
- challenge discrimination and prejudice
- encourage young people and adults to speak out about attitudes or behaviour that makes them uncomfortable

## *Relationships*

You should:

- promote relationships that are based on openness, honesty, trust and respect
- avoid favouritism
- be patient with others
- use special caution when you are discussing sensitive issues with children or young people
- ensure your contact with children and young people is appropriate and relevant to the work of the project you are involved in
- ensure that, whenever possible, there is more than one adult present during activities with children and young people
  - If this isn't possible, ensure that you are within sight or hearing of other adults.
  - If a child specifically asks for or needs some private time with you, ensure other staff or volunteers know where you and the child are.
- only provide personal care in an emergency and make sure there is more than one adult present if possible.
  - This is unless you are working under specific circumstances where it has been agreed that the provision of personal care is part of your role and you have been trained to do this safely.

## *Respect*

You should:

- listen to and respect children at all times
- value and take children's contributions seriously, actively involving them in planning activities wherever possible
- respect a young person's right to privacy as far as possible
  - In some cases, it may be necessary to break confidentiality in order to follow child protection procedures; if this is the case it is important to explain this to the child or young person at the earliest opportunity.

## *Unacceptable behaviour*

When working with children and young people, you must not:

- allow concerns or allegations to go unreported
- take unnecessary risks
- smoke, consume alcohol or use illegal substances
- develop inappropriate relationships with children and young people
- make inappropriate promises to children and young people
- engage in behaviour that is in any way abusive — *this includes having any form of sexual contact with a child or young person*
- let children and young people have your personal contact details (mobile number, email or address) or have contact with them via a personal social media account
- act in a way that can be perceived as threatening or intrusive
- patronise or belittle children and young people
- make sarcastic, insensitive, derogatory or sexually suggestive comments or gestures to or in front of children and young people

## **Upholding this code of behaviour**

You should always follow this code of behaviour and never rely on your reputation or that of our organisation to protect you.

If you have behaved inappropriately you will be subject to our disciplinary procedures. Depending on the seriousness of the situation, you may be asked to leave Cambridge Tutors. We may also make a referral to statutory agencies such as the police and/or the local authority child protection services.

If you become aware of any breaches of this code, you must report them to David Gibbon or Laura Nall. If necessary, you should follow the whistle-blowing procedure and child protection/safeguarding procedures.

# PROCEDURES FOR RESPONDING TO CONCERNS

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## Purpose

The aim of these procedures is to detail how Cambridge Tutors should respond if:

- they suspect that a child is suffering abuse
- a child makes a disclosure or reports that they, or someone else, has been abused
- the behaviour of an adult or child towards a child gives them cause for concern
- they identify a breach of the Safeguarding Code of Conduct
- to detail the action that will be taken by the Designated Safeguarding Lead (or Deputy) when a safeguarding concern is reported

These procedures apply to all employees, workers, volunteers and self-employed tutors of Cambridge Tutors.

*All employees, workers, volunteers and self-employed tutors of Cambridge Tutors must be sent a copy of this policy and signify they have received it and are conversant with the content. It is crucial the Designated Safeguarding Lead and the Deputy, promote this policy and ensure safeguarding is embedded into the culture of the company.*

## Actions

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

- making sure that Cambridge Tutors' employees are made aware of their safeguarding duty and their responsibility to report children who might be at risk
- responding immediately to any concerns that arise by putting in place an early help/intervention policy (giving support as soon as a problem emerges, at any stage in the child or young person's life)
- remaining aware of the different types of disclosure through which a child may reveal abuse (direct verbal statements, indirect ambiguous statements, behavioural signals that something is wrong, non-verbal communication such as writing letters or drawing)
- noticing signs of something wrong, and if so, asking the child if they are OK rather than waiting for them to disclose directly
- ensuring that if a child wishes to disclose information, they are reassured but made aware immediately that this may not be kept confidential if it is of a sensitive nature, but will be told to as few people as possible, and only those who need to know
- ensuring that our tutors know that it is not their responsibility to investigate the concern, merely to report it so that it can be dealt with appropriately
- telling the Cambridge Tutors safeguarding officer within 24 hours after the disclosure has been made, by putting the concern in writing on a Safeguarding concern form
- knowing that the company safeguarding officer will then decide how to proceed with the concern, whether keeping a record of the report and remaining vigilant in case of future

concerns, or calling the local authority safeguarding Designated Officer if necessary to ensure that the matter is investigated

- calling 999 if there are concerns about a child's immediate safety
- creating an environment where children and young people are comfortable about speaking out if anything is worrying them, and letting them know that they can talk to their tutor or Cambridge Tutors' safeguarding lead if they need help

## Identifying and acting upon concerns

### *Observation*

It is our duty to remain observant in order to protect children from harm and promote their welfare.

We should all be alert for the signs and indicators that children and young people who interact or engage with self-employed Cambridge Tutors (employed and self-employed) may be suffering abuse. We should remember that children may be abused by other children and young people as well as by adults.

Should a child disclose abuse to you:

- Stay calm.
- Listen carefully to what is said and try not to interrupt.
- Find an appropriate point early on to explain that it is likely that the information will need to be shared with others – do not promise to keep secrets.
- Allow them to continue at their own pace.
- Ask questions for clarification only and avoid asking questions that suggest an answer (leading questions).
- Reassure them that they are not to blame and have done the right thing in telling you. If the concern is serious explain that you will need to get support from other trained people to help keep the child safe. This must be shared even if the child doesn't want you to tell anyone else.
- Tell them what you will do next and with whom the information will be shared. If they are adamant that they do not wish the information to be shared, explain that you will have to tell the Designated Safeguarding Lead (or Deputy) and that it will be discussed further with them.
- Be aware of the possibility of forensic evidence if the disclosure relates to a recent incident of physical harm or injury and try to protect any supporting materials e.g. bedding or clothing.

### *Reporting*

- Following the disclosure, report to the Designated Safeguarding Lead (or Deputy) at the earliest opportunity.
- Where you are unable to contact Designated Safeguarding Lead, advice can be sought from statutory agencies or the NSPCC Helpline (0808 800 5000, [help@nspcc.org.uk](mailto:help@nspcc.org.uk)).
- All serious concerns must be referred to statutory agencies.
- Where the concern or allegation is about an employee or self-employed tutor, this just like all other concerns must be reported to the Designated Safeguarding Lead (DSL) or Deputy. The DSL if they consider the concern to be serious, for example potentially child abuse or a crime they must report the incident to the Local Authority Designated Officer or the Police.

- When a safeguarding concern or poor practice has been identified concerning a specific child (unless informing them will put the child at further risk) the parents/guardians/carers of that child should be notified. Where the DSL/Deputy has reported the incident to the statutory authority's advice should be sought from them regarding this duty before notifying the parents/guardians/carers.
- Remember it is not the responsibility of an employee or self-employed Cambridge Tutor or anyone assisting in their activities with children, to decide if child abuse is occurring, but it is their responsibility to act on any concerns by reporting them.
- Report concerns that you have to the Designated Safeguarding Lead (or Deputy). Any member of staff can contact the Designated Safeguarding Lead (or Deputy) for advice, support or guidance. This must be done immediately. If there is a suspicion of immediate danger to the child, contact 999.
- If a member of the public, parent/guardian, police or Local Authority Services reports a safeguarding concern to Cambridge Tutors then the matter must be referred to the Designated Safeguarding Lead (or in their absence or if the person subject to the report is the Designated Safeguarding Lead, the Deputy) for assessment no later than the next working day.
- If for any reason the Designated Safeguarding Officer Lead cannot be contacted, the following organisations can be contacted for advice:
  - Concern about a child — Contact the Local Authority Children Services: website [safeguardingpeterborough.org.uk/children-board/reporting-concerns/](https://safeguardingpeterborough.org.uk/children-board/reporting-concerns/), 0345 045 5203
  - Local Police — Call 101 for non-emergency referrals, 999 for emergency response.

### *Recording the incident*

It is important that you keep an accurate written record of any safeguarding concern that you have or that someone raises with you. Your written record must:

- be made as soon as possible after the event/concern is raised;
- contain the date, time, people present, anything said (verbatim if possible);
- detail the behaviour and demeanour of the person disclosing the safeguarding issue.
- detail any action you have taken (for example how you have reduced risk or whether you have referred the matter to the Designated Safeguarding Lead or Deputy);
- be a factual account of what has happened;
- be accurate and comprehensive
- do not record any opinion about what has happened. You are not there to judge or ascertain whether what you are being told is correct.

You should record your concern(s) on Cambridge Tutors Safeguarding Report Form. Once you have recorded your concerns you should sign and date the report or record the date and time the concern was recorded on the report.

All Safeguarding Reports must be emailed to the DSL, David Gibbon ([david@cambridgetutors.com](mailto:david@cambridgetutors.com)).

## ROLE OF THE DESIGNATED SAFEGUARDING LEAD

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### **Purpose**

The Designated Safeguarding Lead (DSL) or Deputy will manage the safeguarding process and respond to any safeguarding concern. Their role is not to investigate the concern reported or to make judgements about the individuals or allegations involved but to ensure that appropriate referrals are made to statutory agencies and effective internal action is taken to keep people safe.

### **Actions**

When a safeguarding concern has been reported the DSL or Deputy will:

- assess the information received
- identify any risks to individuals contained within the report
- decide if immediate action is needed to remove, reduce or control the risks identified
- take such action if it is required
- decide whether the information in the safeguarding concern constitutes a safeguarding allegation against a member of staff or person working on behalf of Cambridge Tutors
- decide whether a referral to the police and/or Local Authority Services is required
- decide what further action by Cambridge Tutors may be needed for the management of the investigation

Where it is decided that the information contained in the safeguarding concern constitutes a Safeguarding Allegation the DSL or Deputy will follow Cambridge Tutors procedure for the management of a safeguarding allegation (see *Procedures for responding to safeguarding concerns*).

When a safeguarding concern is raised the DSL or Deputy will determine what action is needed. The action taken may include monitoring the situation, a referral to children social care or the police or taking no action. Whatever decision is taken they will record this together with a rationale, even if no further action is to be taken. A decision to take no further action, monitor, or defer a decision is taken as seriously as a decision to make a referral.

Any referrals to statutory services must be made by the DSL or Deputy by the next working day, unless it is an emergency, or they consider it better for another person to make the referral and report back.

Any referrals to statutory services must be followed up in writing within 48 hours and feedback received/sought within 3 working days of having made the referral to check what action is being taken. It is the responsibility of the DSL to ensure this takes place and to ensure that comprehensive records are maintained.

### **Escalation policy**

If, after reporting on a concern, it is evident that the local authority or other agency has not taken appropriate next steps in relation to the safeguarding concern, then the DSL or Deputy will determine if the matter needs escalating. The Child Safeguarding Strategic Partnerships will have specific procedures to be followed in such instances where escalation is warranted. A record of any decisions and outcomes must be kept by the DSL or Deputy.

# ANTI-BULLYING POLICY AND PROCEDURES

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## Purpose

- To outline the policy in place regarding bullying and ensuring that the appropriate procedures are clear and known to our staff.
- Although we are primarily a tutoring company, and the courses we run are not long-term, we have included an anti-bullying policy in the case of incidents during a course which could distress a child and require further action.

## Definition

- Bullying is deliberately hurtful behaviour, usually repeated over a period of time, where it is difficult for the victims to defend themselves.
- It can cause considerable distress to children, to the extent that it affects their health and development and can be a source of significant harm, including self-harm and suicide.
- The four main types of bullying are:
  - physical abuse: hitting, kicking, stabbing and setting alight including for filming with mobile telephones and theft, commonly of mobile phones
  - verbal or mobile telephone / online (internet) message abuse (e.g. racist, sexist or homophobic name-calling or threats: this type of physical bullying may include sexual harassment
  - mobile telephone or online (internet) visual image abuse: these can include real or manipulated images
  - emotional abuse e.g. isolating an individual from the group or emotional blackmail
- Information and Communication Technology (ICT) based forms of child physical, sexual and emotional abuse can include bullying via mobile telephones or online (internet) with verbal and visual messages (NSPCC, 2017).
- Cambridge Tutors will under no circumstances tolerate bullying of children, and will take immediate action as outlined below.

## Actions

- Staff and tutors will set a good example for children, and ensure that it is made clear that bullying will not be tolerated at any time.
- If an incident of bullying is reported, the member of staff alerted will reassure and support the students involved, before making detailed notes of the incident, reporting it to the DSL, and, if deemed necessary, to other members of staff on the course or parents.
- If an incident of bullying is witnessed by an adult, that adult may need to take action to separate the children, and if necessary contact the parents of the child/ren to deal with the matter.
- If the incident is serious, Cambridge Tutors will consider banning the bully (or bullies) from future courses (once a full and fair investigation has taken place).

### Legal framework

This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect children in England. Summaries of the key legislation and guidance are available on:

- online abuse — [learning.nspcc.org.uk/child-abuse-and-neglect/online-abuse](https://learning.nspcc.org.uk/child-abuse-and-neglect/online-abuse)
- bullying — [learning.nspcc.org.uk/child-abuse-and-neglect/bullying](https://learning.nspcc.org.uk/child-abuse-and-neglect/bullying)
- child protection — [learning.nspcc.org.uk/child-protection-system](https://learning.nspcc.org.uk/child-protection-system)

### Policy statement

We believe that:

- children and young people should never experience abuse of any kind
- children should be able to use the internet for education and personal development, but safeguards need to be in place to ensure they are kept safe at all times

We recognise that:

- the online world provides everyone with many opportunities. However, it can also present risks and challenges
- we have a duty to ensure that all children, young people and adults involved in our organisation are protected from potential harm online
- we have a responsibility to help keep children and young people safe online, whether or not they are using Cambridge Tutors' network and devices
- all children, regardless of age, disability, gender reassignment, race, religion or belief, sex or sexual orientation, have the right to equal protection from all types of harm or abuse
- working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people's welfare and in helping young people to be responsible in their approach to online safety

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

- appointing an online safety coordinator
- providing clear and specific directions to staff and volunteers on how to behave online through our behaviour code for adults
- supporting and encouraging the young people using our service to use the internet, social media and mobile phones in a way that keeps them safe and shows respect for others
- supporting and encouraging parents and carers to do what they can to keep their children safe online
- developing clear and robust procedures to enable us to respond appropriately to any incidents of inappropriate online behaviour, whether by an adult or a child/young person



- reviewing and updating the security of our information systems regularly
- ensuring that usernames, logins, email accounts and passwords are used effectively
- ensuring personal information about the adults and children who are involved in our organisation is held securely and shared only as appropriate
- ensuring that images of children, young people and families are used only after their written permission has been obtained, and only for the purpose for which consent has been given
- providing supervision, support and training for staff and volunteers about online safety
- examining and risk assessing any social media platforms and new technologies before they are used within the organisation

If online abuse occurs, we will respond to it by:

- having clear and robust safeguarding procedures in place for responding to abuse (including online abuse)
- providing support and training for all staff and volunteers on dealing with all forms of abuse, including bullying/cyberbullying, emotional abuse, sexting, sexual abuse and sexual exploitation
- making sure our response takes the needs of the person experiencing abuse, any bystanders and our organisation as a whole into account
- reviewing the plan developed to address online abuse at regular intervals, in order to ensure that any problems have been resolved in the long term

# PHOTOGRAPHY AND IMAGE SHARING GUIDANCE

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## Legal framework

This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect children in England. Summaries of key legislation and guidance is available on:

- online abuse — [learning.nspcc.org.uk/child-abuse-and-neglect/online-abuse](https://learning.nspcc.org.uk/child-abuse-and-neglect/online-abuse)
- child protection — [learning.nspcc.org.uk/child-protection-system](https://learning.nspcc.org.uk/child-protection-system)

## Policy statement

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 and to take, share and use images of children safely

We recognise that:

- the welfare of the children and young people taking part in our activities is paramount
- children and their parents/carers have a right to decide whether their images are taken and how these may be used, regardless of age, disability, gender reassignment, race, religion or belief, sex or sexual orientation
- consent to take images of children is only meaningful when the children and their parents/carers understand the potential risks associated with the use and distribution of these images
- there are potential risks associated with sharing images of children online

More information about this is available from

[learning.nspcc.org.uk/researchresources/briefings/photography-sharing-images-guidance](https://learning.nspcc.org.uk/researchresources/briefings/photography-sharing-images-guidance)

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

- always asking for written consent from a child and their parents or carers before taking and using a child's image
- changing the names of children whose images are being used in our published material whenever possible (and only using first names if we do need to identify them)
- never publishing personal information about individual children
- making sure children, their parents and carers understand how images of children will be securely stored and for how long (including how we will control access to the images and their associated information)

- reducing the risk of images being copied and used inappropriately by:
  - only using images of children in appropriate clothing (including safety wear if necessary)
  - avoiding full face and body shots of children taking part in activities such as swimming where there may be a heightened risk of images being misused
- using images that positively reflect young people's involvement in the activity

We will also develop a procedure for reporting the abuse or misuse of images of children as part of our child protection procedures. We will ensure everyone involved in our organisation knows the procedures to follow to keep children safe.

## **Photography and/or filming for personal use**

When children themselves, parents/carers or spectators are taking photographs or filming at our events and the images are for personal use, we will publish guidance about image sharing in the event programmes and/or announce details of our photography policy before the start of the event. This includes:

- reminding parents/carers and children that they need to give consent for Cambridge Tutors to take and use images of children
- asking people to gain permission from children and their parents/carers before sharing photographs and videos that include them
- recommending that people check the privacy settings of their social media account to understand who else will be able to view any images they share
- reminding children, parents and carers who they can talk to if they have any concerns about images being shared

## **Photography and/or filming for Cambridge Tutors' use**

We recognise that our group leaders may use photography and filming as an aid in activities such as music or drama. However, children/young people and their parents/carers must be made aware that this is part of the programme and give written consent.

If we hire a photographer for one of our events, we will seek to keep children and young people safe by:

- providing the photographer with a clear brief about appropriate content and behaviour
- ensuring the photographer wears identification at all times
- informing children and parents/carers that a photographer will be at the event and ensuring they give written consent to images which feature their child being taken and shared
- not allowing the photographer to have unsupervised access to children
- not allowing the photographer to carry out sessions outside the event or at a child's home
- reporting concerns regarding inappropriate or intrusive photography following our child protection procedures

## **Photography and/or filming for wider use**

If people such as local journalists, professional photographers (not hired by Cambridge Tutors) or students wish to record one of our events and share the images professionally or in the wider world, they should seek permission in advance.

They should provide:

- the name and address of the person using the camera
- the names of children they wish to take images of (if possible)
- the reason for taking the images and/or what the images will be used for
- a signed declaration that the information provided is valid and that the images will only be used for the reasons given

Cambridge Tutors will verify these details and decide whether to grant permission for photographs/films to be taken. We will seek consent from the children who are the intended subjects of the images and their parents and inform the photographer of anyone who does not give consent.

At the event we will inform children, parents and carers that an external photographer is present and ensure they are easily identifiable, for example by using them with a coloured identification badge.

If Cambridge Tutors is concerned that someone unknown to us is using their sessions for photography or filming purposes, we will ask them to leave and (depending on the nature of the concerns) follow our child protection procedures.

## **Storing images**

We will store photographs and videos of children securely, in accordance with our safeguarding policy and data protection law.

We will keep hard copies of images in a locked drawer and electronic images in a protected folder with restricted access. Images will be stored for a period of 2 years.

We will never store images of children on unencrypted portable equipment such as laptops, memory sticks and mobile phones.

Cambridge Tutors does not permit staff and volunteers to using any personal equipment to take photos and recordings of children. Only cameras or devices belonging to Cambridge Tutors should be used.

## CHILD PROTECTION DATA MANAGEMENT

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Those with concerns should be proactive in sharing information as early as possible to help the Designated Safeguarding Lead (or the Deputy) and other professionals identify, assess and respond to risks or concerns about the safety and welfare of children.

Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety, of children, which must always be the paramount concern. The Data Protection Act (2018)<sup>1</sup> and/or the General Protection Regulations (2018) do not prevent you from sharing information in relation to safeguarding.

You should not assume that someone else will pass on information that you think may be critical to keeping a child safe.

Cambridge Tutors Staff or those acting on their behalf should aim to gain consent to share information but should be mindful of situations where to do so would place a child at increased risk of harm.

Information may be shared without consent if a practitioner has reason to believe that there is a good reason to do so and that the sharing of information will enhance the safeguarding of a child in a timely manner. When decisions are made to share or withhold information, practitioners should record who has been given the information and why.

The Designated Safeguarding Lead (or Deputy) and Company Director must always be contacted before the information is shared with an external organisation except in cases where there is a risk of immediate or serious harm and an emergency referral is necessary. The Designated Safeguarding Lead or Deputy will manage the process of sharing information with the police, local authority services and/or any third-party organisation.

Information should be kept confidential and should only be shared with Cambridge Tutors staff members and those working on their behalf who need to know the information. If there is any doubt about whether to share information or whom to share it with, the Designated Safeguarding Lead should be contacted for advice before disclosing any information:

Senior designated safeguarding lead:

- David Gibbon — [david@cambridgetutors.com](mailto:david@cambridgetutors.com), 01865 655660, 07715 990539

NSPCC

- NSPCC Helpline — [nspcc.org.uk](https://www.nspcc.org.uk), 0808 800 5000

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<sup>1</sup> The Data Protection Act 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information. This includes allowing practitioners to share information without consent, if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.

## SAFEGUARDING REPORT FORM

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You must report any safeguarding concern to the Designated Safeguarding Lead by telephone as soon as possible and certainly within 24 hours. Complete as much detail as possible. For advice completing this form please contact the DSL.

**Complete as much detail as possible. For advice completing this form please contact the DSL or Deputy. If a child or adult is at immediate risk of harm or needs medical attention contact the emergency services on 999.**

### Part 1. Details of the child/ren

Name(s): And/or:	
Age:	Date of Birth:
Religion:	Ethnicity:
Sex:	
Telephone:	Email:
Additional needs (e.g. disability, language is spoken, interpreter required)	
Home address of child/ren or adult at risk:	
Parent or Carer(s) name(s) and contact telephone number:	
Any other relevant information	

### Part 2. Where relevant details of Cambridge Tutors Employee or self-employed tutor about whom the allegation has been made, or concern has been raised about.

Name:	
Age and Date of Birth:	Role:
Home Address:	Contact Telephone and/or email:

### Part 3. Your details (the person making the report)

Name: Or:	Role:
Contact telephone and email:	
Date and Time you are making a report:	
Date and time you first received information or identified a concern:	

### Part 4. Safeguarding Report

Are you reporting your own concerns or responding to concerns raised by someone else?
If responding to concerns raised by someone else please provide their name, role and contact details (if known):
Please add any other relevant information known about the family/child/adult at risk circumstances: <u>Referral Background:</u> When was the referral made, by whom, in what form?  <u>Concern Raised/Allegation:</u> What is the allegation, or the nature of the concern raised? Include as much detail as possible.
Has the child or adult at risk given an account of what happened? (e.g. of any incident, injury, disclosure, behaviour) (give details):

Please provide details of the person alleged to have caused the incident/injury if known (e.g. names(s) /address/ incident address /relationship to child or adult at risk etc.):
Please provide details (name, role contact details if known) of any witnesses to the incident/concerns:

**Part 5. Actions taken**

State any risk of immediate danger:	
Identify any action taken already e.g. contact with police, manager, children's	Referred to: Police <input type="checkbox"/> Social Services <input type="checkbox"/>
or adult social care services etc.	Designated Safeguarding Lead <input type="checkbox"/> Deputy Designated Safeguarding Lead <input type="checkbox"/> Other <input type="checkbox"/>
Is the child/children/adult at risk or family/carer or accused person aware that a report has been made:	Child/ren or adult at risk <input type="checkbox"/> Family or carer <input type="checkbox"/> Accused person <input type="checkbox"/>
Any known previous history of concerns or abuse or allegations:	
Any further information or comments:	

**Thank you for your report.**

**Please email this form to [david@cambridgetutors.com](mailto:david@cambridgetutors.com).**

**If handwritten please hand to the Designated Safeguarding Lead, David Gibbon.**





## KEY CONTACTS

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### Cambridge Tutors Key Contact Details

Senior designated safeguarding lead:

- David Gibbon — [david@cambridgetutors.com](mailto:david@cambridgetutors.com), 01865 655660, 07715 990539

Deputy safeguarding lead:

- Laura Nall — [laura@cambridgetutors.com](mailto:laura@cambridgetutors.com), 07710 499718

Online safety co-ordinator, photography and images co-ordinator

- Joseph Bradley — [joe@cambridgetutors.com](mailto:joe@cambridgetutors.com), 07874 027668

Local Authority Safeguarding Contact

- Cambridgeshire and Peterborough — [safeguardingpeterborough.org.uk/children-board/reporting-concerns/](https://safeguardingpeterborough.org.uk/children-board/reporting-concerns/), 0345 045 5203

NSPCC

- NSPCC Helpline — [nspcc.org.uk](https://nspcc.org.uk), 0808 800 5000