



Therapeutic Learning Service

Safeguarding Policy, Procedure, and Guidance

Published August 2025

Reviewed by August 2026

UPDATES RELATING TO KCSIE 2025 ARE HIGHLIGHTED IN YELLOW

Contents

1. Contact Details	2
2. Kite Safeguarding Report Procedure	3
3. About Kite Therapeutic Learning Services	4
4. Child Protection, Adult Protection and Safeguarding Policy	4
5. Purpose of Policy and Procedures	7
6. Scope of Policy and Procedures	7
7. Legal Framework	8
8. Definitions	8
9. Key Points	10
10. The Role of the Designated Safeguarding Lead	10
11. Staff Responsibilities	12
12. Kite TLS Safeguarding – Providing a Safe Environment	12
13. Recognition and Protection of Vulnerable Groups	14
14. Safeguarding and Protection from Harm – Recognising Abuse	14
15. Safeguarding and Protection from Harm – Responding to Abuse	17
16. Safeguarding and Protection from Harm – Reporting and Recording	18
17. Contact with the Family	21
18. Child Protection Plans	21
19. Requests for Assistance from External Agencies	22
20. Managing Allegations of Abuse Against Staff	23
21. Data Protection, GDPR and Information Sharing	24
22. Staff Training	24
23. Policy Review Details	28
24. Appendix A – Further Information, Advice and Guidelines	29
25. Appendix B1 – Hampshire Safeguarding Concern Procedure Flow Chart	31
26. Appendix B2 – Surrey Safeguarding Concern Procedure Flow Chart	32
27. Appendix B3 – SCC Guidance on Safeguarding Concern for a Looked After Child (LAC), Arising during a 1-2-1 Session	33
28. Appendix C – Further Types of Abuse	35
29. Appendix D – Safeguarding Concern Report template + Body Map	38



Therapeutic Learning Service

1. Contact Details:

CONTACT DETAILS	Contact Name and Training Information	Contact Details
Kite Therapeutic Learning Services Operations Manager	Caroline Byrne-Fraser	caroline@kitetls.co.uk
Kite Therapeutic Learning Services Designated Safeguarding Lead (DSL)	Laura Kerbey DSL Training Completed: Success In Schools Advanced Safeguarding for DSL's Completed: 15.11.2024 Due for renewal: 14.11.2026	laura@kitetls.co.uk safeguarding@kitetls.co.uk
Kite Therapeutic Learning Services Deputy Designated Safeguarding Lead (DDSL) & Safer Recruitment Lead	Andrea Haybittle DSL Training Completed: Success In Schools Advanced Safeguarding for DSL's Completed: 14.11.2024 Due for renewal: 13.11.2026	andrea@kitetls.co.uk
Kite Therapeutic Learning Services Deputy Designated Safeguarding Lead (DDSL)	Caroline Byrne-Fraser DSL Training Completed: Success In Schools Advanced Safeguarding for DSL's Completed: 17.09.2025 Due for renewal: 16.09.2027	caroline@kitetls.co.uk
Kite Therapeutic Learning Services Directors	Laura Kerbey Andrea Haybittle	laura@kitetls.co.uk andrea@kitetls.co.uk



Therapeutic Learning Service

Kite TLS Safeguarding Team
safeguarding@kitetls.co.uk



Laura Kerbey
Kite TLS Director
Designated Safeguarding
Lead (DSL)
Email: laura@kitetls.co.uk



Andrea Haybittle
Kite TLS Director
Deputy Designated
Safeguarding Lead (DDSL)
& Safer Recruitment Lead
Email: andrea@kitetls.co.uk

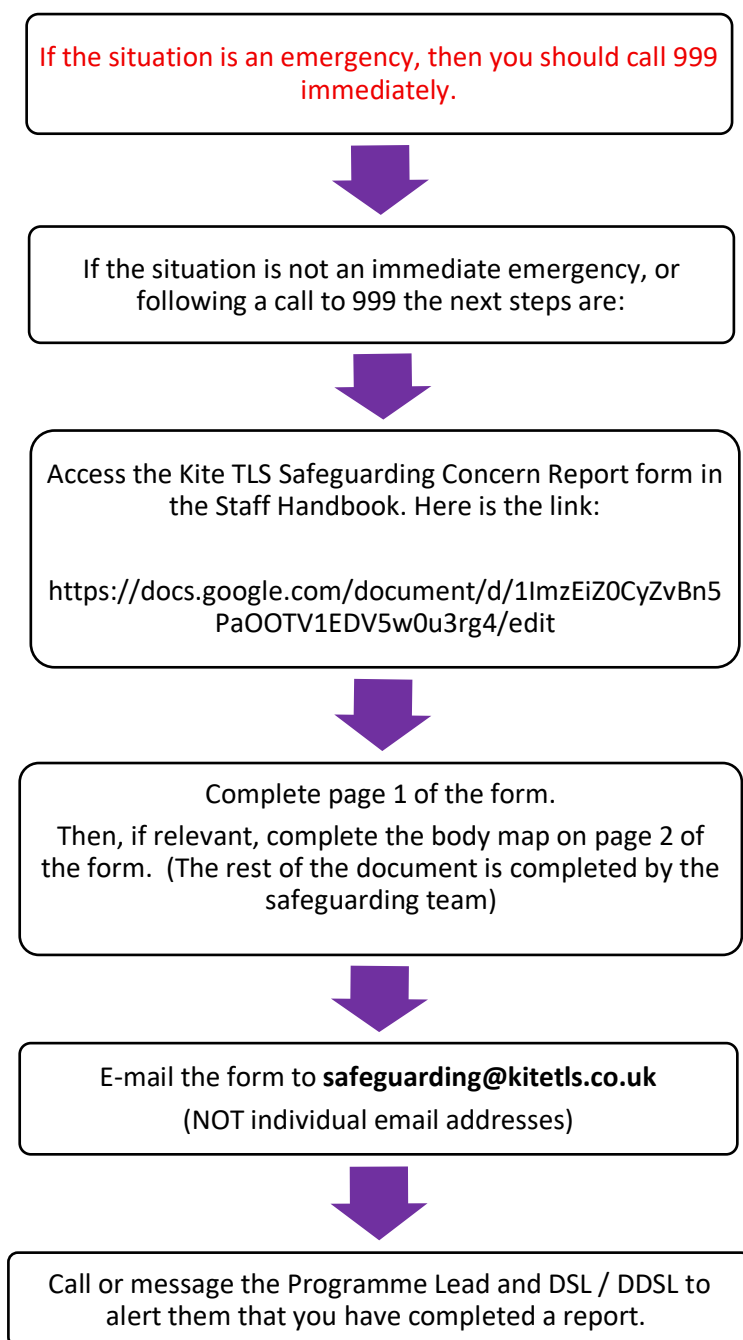


Caroline Byrne-Fraser
Kite TLS Operations
Manager
Deputy Designated
Safeguarding Lead (DDSL)
Email: caroline@kitetls.co.uk



Therapeutic Learning Service

2. Kite Safeguarding Report Procedure:





Therapeutic Learning Service

3. About Kite Therapeutic Learning Services

The KITE Therapeutic Learning Service (Kite TLS) is a specialist provision. It provides support to children, young people, adults at risk, families and professionals in a wide range of settings. Most predominantly it provides bespoke, holistic education provisions to meet the needs of individual students in the following Key Stages:

- Key Stages 1 & 2 (Infants and Primary)
- Key Stages 3 & 4 (Secondary)
- Key Stage 5 (Post-16)

The provision offers a range of national curriculum subjects and beyond; including personalised programmes for students who require a more tailored approach on a one-to-one basis.

KITE TLS is designed to provide kinaesthetic, integrated, therapeutic education.

KITE is committed to supporting young people with Special Educational Needs, in the following contexts or environments:

- EOTAS / EOTIS Packages
- Mainstream provisions (Primary/ Secondary/ Further Education)
- Specialist schools or provisions
- Home Education
- Students working from home whilst awaiting assessment of needs or a suitable placement

4. Child Protection, Adult Protection and Safeguarding Policy

KITE Therapeutic Learning Service is committed to providing outstanding educational opportunities for all of our pupils and students. The safety and welfare of our community is of the utmost importance.

All adults working within our provision must protect children and adults at risk from abuse and be aware that any individual may be abused or at risk of abuse.

For the purpose of our policies and procedures related to KITE TLS, the term 'staff' refers to any individual working for, or on behalf of, KITE TLS. This includes all associates and volunteers. Further to this, the term 'employer' refers to KITE TLS as an organisation.

This policy includes procedures for dealing with allegations of abuse against staff.

This policy includes procedures for the recruitment and selection of staff and volunteers.



Therapeutic Learning Service

The policy and procedures are reviewed at least annually to ensure that updates to relevant guidance and practice are reflected and embedded across KITE TLS provisions.

The notion and practice of safeguarding underpins all aspects of our practice as education providers.

Service	Contact Name/ Availability	Contact Details
Hampshire Local Authority Designated Officer (LADO)	Monday to Friday: 9am – 5pm	Tel: 01962 876364 Or complete the LADO service initial enquiry form: https://forms.office.com/Pages/ResponsePage.aspx?id=tdiBPwfuF0yGnB200QGnm3hCO_yf_9JNiASh9OheoihUQTJRFM0SE0zUFE2Q1BPT0Y1SE5TTDMwVy4u
Hampshire Safeguarding Children Partnership (SCP)	Report a concern - Hampshire SCP	Tel: 01329 225379
Surrey Children's Single Point of Access (C- SPA)	0300 470 9100 Monday to Friday: 9am – 5pm	For concerns for a child or young person: cspa@surreycc.gov.uk For concerns for an adult: ascmash@surreycc.gov.uk
Surrey Children's Single Point of Access (out of hours Emergency Duty Team) (EDT)	Monday to Friday: 5pm – 9am Weekends: 24 hours	Tel: 01483 517898 edt.ssd@surreycc.gov.uk Fax: 01483 517895 SMS number: 07800000388 (for deaf and hard of hearing callers online) To make a call via text direct, please dial 18001 01483 517898
Surrey Local Authority Designated Officer (LADO)	Monday to Friday: 9am – 5pm	0300 123 1650 LADO@surreycc.gov.uk



Therapeutic Learning Service

NSPCC Parent	Monday to Friday: 8am - 10pm Weekends: 9am – 6pm Online: 24 Hours a day, 365 days	0808 800 5000 help@nspcc.org.uk Online form available at https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/report/report-abuse-online/
NSPCC Whistleblowing		0800 028 0285 help@nspcc.org.uk

Safeguarding is everyone's responsibility. All adults working with (or on behalf of) Kite TLS pupils and students **must always follow all of our policies and procedures.**

This policy was last updated in July 2025 and will be due for review at the latest in August 2026.

This policy was updated by the Kite TLS Safeguarding Team.



Therapeutic Learning Service

5. Purpose of Policy and Procedure

The purpose of the policy is to assist Kite TLS in discharging its duties and commitments in respect of safeguarding students, staff and the wider community (including children, young people and adults at risk) in provision-led activities fully, effectively and in accordance with statutory guidance and legislation.

In order to fulfil these duties, Kite TLS will ensure:

- An approach to safeguarding aimed at reducing risk and promoting safety is embedded across the institution
- All staff are made aware of their roles and responsibilities in relation to safeguarding
- All policies, procedures, relevant legislation and guidance are available to staff at all times
- Robust procedures are in place for dealing with concerns, allegations or disclosures of abuse or vulnerability to radicalisation. These can be found within this document
- Training, advice and guidance is provided to all staff relating to safeguarding and protection from harm, including the recognition of abuse, neglect and vulnerability to radicalisation. Training will be provided annually to ensure staff remain up to date with relevant national legislation and guidance, institutional policies and procedures and also best practice
- Providing a working environment in which all individuals feel safe, secure, valued and respected so that they know how to, and feel confident to, approach adults to share worries or concerns, knowing that these will be taken seriously and responded to appropriately
- Kite TLS follows safer recruitment practices which includes ensuring that all staff and volunteers are subject to appropriate checks

6. Scope of Policy and Procedures

The scope of this policy refers to those aspects of safeguarding and protection from harm which are directly related to:

- The protection of children, young people and adults at risk from abuse. The terms child and young person are used extensively in this policy and are interchangeable. They refer to people under the age of 18.
- The protection from radicalisation and exploitation of all students
- The protection of adults at risk from abuse. The term “adults at risk” replaces the previous terminology used of “vulnerable adults”. Adults at risk are defined as people over the age of 18 “who may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation” (NHS England, 2019)



Therapeutic Learning Service

7. Legal Framework

The policy is reviewed regularly and takes into consideration statutory guidance and legislation relating to safeguarding and child protection, including:

- The Children Act 1989 / 2004 (with later amendments)
- Safeguarding Vulnerable Groups Act 2006
- The Sexual Offences Act 2003-2015
- Tackling Child sexual abuse strategy 2021
- Guidance for English Higher Education Institutions (HEIs) (DIUS, 2007)
- Protection of Freedoms Act 2012
- Children and Families Act 2014
- Care Act 2014
- Equality Act 2010
- Prevent Duty Guidance (HM Government - March 2015, updated April 2019)
- Working together to Safeguard Children (HM Government - December 2023)
- Keeping Children Safe in Education (Department of Education - September 2025)
- Keeping Children Safe in Education – During Community Activities, After- School Clubs and Tuition (Guidance for non-statutory guidance for providers running out-of-school settings (October 2020)
- Information Sharing: Advice for Practitioners (HM Government - July 2018)
- What to do if you are worried a child is being abused (HM Government - March 2015)
- Local Safeguarding Children Partners and Child Protection Procedures
- SCIE guidance for safeguarding adults at risks
- Serious Crime Act 2015
- Review-of-sexual-abuse-in-schools-and-colleges/review-of-sexual-abuse-in-schools-and-colleges OFSTED 2021

8. Definitions

KITE TLS recognises and adheres to the statutory legislation and guidance surrounding safeguarding and child protection.

It adheres to the definition of safeguarding given in Keeping Children Safe in Education (September 2025), along with the duty to both children and adults at risk.

“Keeping Children Safe in Education (September 2025) states that:

“Safeguarding and promoting the welfare of children is everyone’s responsibility. ‘Children’ includes everyone under the age of 18. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child centred. This means that they should consider, at all times, what is in the best interests of the child”.



Therapeutic Learning Service

Child Protection refers to the specific actions that are taken to protect a child or children who are suffering from, or who are likely to suffer from, abuse.

In the KCSIE 2025 Document, Safeguarding and promoting the welfare of children is defined as:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, whether that is within or outside the home, including online
- Preventing the impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

As defined in the Children Act (2004), a child is anyone who is yet to reach their 18th birthday.

Child protection relates to any child (under 18) who has suffered from, or may be at risk of physical injury, neglect, emotional abuse or sexual abuse.

Adults at risk from abuse. The term "adults at risk" replaces the previous terminology used of "vulnerable adults". Adults at risk are defined as people over the age of 18 "who may be in need of community care services by reason of mental or other disability, age or

illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation" (NHS England, 2019).

KITE TLS recognises the importance of contextual safeguarding in working to ensure the safety and wellbeing of children, young people and adults at risk. We are committed to understanding the extra-familial risks that may impact upon our students' safety and where necessary will work in partnership with our safeguarding partners to ensure that such factors are considered when action is taken to safeguard a child, young person or adult at risk. Extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.'



Therapeutic Learning Service

9. Key Points

All staff working on behalf of, or representing, KITE TLS must be clear about their own roles and that of others when providing a caring and safe environment for children, young people and adults at risk.

Staff must know how to recognise, respond to and report concerns and ensure that the safety and wellbeing of the individual is paramount.

KITE TLS has appointed a Designated Safeguarding Lead (DSL) and 2 Deputy Designated Safeguarding Leads (DDSLs) which constitutes KITE TLS's "Safeguarding Team". Documented within this policy are relevant contact details relating to safeguarding at KITE TLS and Surrey Local Authority. It is important to note that KITE TLS also work with individuals from other local authorities, outside of Surrey. Where a concern arises for an individual or their family contact must be made with the appropriate local authority.

The Designated Safeguarding Lead has overall responsibility for safeguarding and child protection at KITE TLS (details of roles and responsibilities are below).

Though some of the duties inherent to this role can and will be delegated to the deputy DSL, in order that work or required actions are taken quickly and efficiently, **the ultimate responsibility for safeguarding and the protection of children, young people or adults at risk remains with the Designated Safeguarding Lead.** In the absence of the DSL, the deputy will undertake DSL duties.

10. The Role of the Designated Safeguarding Lead

The Designated Safeguarding Lead (DSL) within KITE TLS with responsibility for safeguarding and child/adult protection is Laura Kerbey (Kite TLS Director).

The Deputy Designated Safeguarding Leads are:

- Caroline Byrne-Fraser
- Andrea Haybittle

The role of the Designated Safeguarding Lead is to:

- Review and update the policy and any related policies/ procedures at least annually, or as required by updates to legislation and national guidance
- Oversee the development and implementation of robust safeguarding procedures, ensuring that these are readily available to staff and that staff and stakeholders are familiar with them
- Ensure that they are aware of the current legislation relating to safeguarding and child protection
- Maintain a clear and concise training record, ensuring that all relevant training is completed and up to date



Therapeutic Learning Service

- Ensure that all staff and stakeholders are aware of this policy and related documentation
Provide or arrange appropriate safeguarding training for staff, ensuring that they have a clear understanding of their roles and responsibilities relating to this area and are confident that they know how to recognise, report and refer potential concerns as necessary
- Support staff involved in reporting incidents of concern
- Be responsible for coordinating action within the provision on safeguarding issues, including the proactive identification and management of early intervention and support
- Liaise with staff on a 'need to know' basis so that students' rights to confidentiality are maintained, ensuring that they are promoting educational outcomes by sharing information about safeguarding and child protection issues with relevant staff and services
- Represent the provision at child protection meetings and be a member of 'core groups' as required.
- Call for multi-agency Best Interest/ Professionals meetings as appropriate
- Liaise with external agencies such as the Local Authority, Social Services (child and adult), Police, Local Authority Designated Officers, Clinical Commissioning Groups and other agencies on individual cases of suspected or identified abuse (Surrey referrals of concern should be made through the Children's/ Adult's Single Point of Access)
- Act as the contact person within the provision for external agencies (this may be delegated to other members of the Safeguarding Team with the approval and supervision of the Designated Safeguarding Lead)
- Refer cases to the Channel programme as required, for children, young people or adults at risk who have been identified as being vulnerable to radicalisation, extremism or terrorism
- Support staff who make referrals to the Channel programme
- Be aware of students who have additional support needs or students who have allocated support from external agencies such as a social worker
- Supervise the practice of the Safeguarding Team, ensuring that they have accessed appropriate and relevant training that it is in date
- Work collaboratively and efficiently with external agencies
- Keep clear, concise and accurate records relating to child protection and safeguarding concerns, including copies of any referrals and interventions from external agencies

Members of the KITE TLS Safeguarding Team have, and will continue to undertake, relevant training pertaining to the role.

The Designated Safeguarding Lead and Deputy Designated Safeguarding Leads are required to complete Level 3 and training which is updated every 2 years. This is in addition to regular updates and training that support them to fulfil their roles and responsibilities.



Therapeutic Learning Service

11. Staff Responsibilities

All staff are responsible for:

- Providing a working environment in which all individuals feel safe, secure, valued and respected so that they know how to, and feel confident to, approach adults to share worries or concerns, knowing that these will be taken seriously and responded to appropriately
- Ensure that they have read and understood all relevant policies and procedures relating to safeguarding and protection from abuse
- Maintain an attitude of 'it could happen here' in order to remain vigilant to the possibility of abuse
- The fact that an incident has occurred should be reported immediately to the Designated Safeguarding Lead. The relevant Programme Lead should also be notified that an incident has occurred.
- Then report all concerns, without judgement about their significance and immediately without unnecessary delay, to the Designated Safeguarding Lead by completing the safeguarding concern report (appendix in this document) and forward this to the safeguarding@kitetls.co.uk dedicated email address.
- Establish and maintain professional working relationships with students and families at all times. No attempt should be made to build or encourage any friendship with students or their families outside of contracted roles and responsibilities. This includes telephone and personal contact and contact via social media. Please note that communication via social media must only be through KITE TLS approved accounts.
- Ensure that they are familiar with, and adhere, to all policies and procedures in place at KITE TLS.
- Adhere to information sharing and guidance, ensuring that personal information relating to safeguarding is only shared on a 'need to know basis'
- Ensure that they access all required training and complete this within agreed timescales – including training relating to safeguarding, child protection and the Prevent Duty.
- To ensure that they have visible and on their person, during all scheduled appointments or sessions, their KITE TLS ID badge.

12. Kite TLS Safeguarding – Providing a Safe Environment

Kite TLS works to safeguard children, young people, adults at risk and staff by:

- Ensuring the provision is designed to acknowledge the potential vulnerability of all of its students to be abused, particularly the additional vulnerability of students with special educational needs and disabilities (SEND).
- Ensuring that the provision is built on a foundation of supporting and equipping students with the relevant knowledge and skills to develop their independence skills, keep themselves safe and know how to ask help.



Therapeutic Learning Service

- Children at Kite TLS are taught about how they can keep themselves and others safe, including online. To be effective, we present this information in an age-appropriate, learner-led way. We are sensitive to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities.
- Supporting students to be confident and have positive self-image and self-esteem, both through the delivery of educational lessons and the development of a culture that meets their emotional, social and mental health needs.
- Ensuring that staff are provided with the necessary training and skills to undertake their roles and responsibilities. This includes regular training and support relating to the different forms that abuse can take, including (but not limited to):

Physical Abuse	Radicalisation
Sexual Abuse	Discriminatory Abuse
Emotional Abuse	Bullying (including cyber bullying)
Neglect	Criminal Exploitation
Child on Child Abuse	Gangs and Youth Violence
Child Sexual Exploitation	Female Genital Mutilation
Financial Abuse	Fabricated or Induced Illness
Institutional Abuse	Forced Marriage
Trafficking	Faith Abuse
Grooming	Historical (or non-recent) Abuse
Online Abuse	Slavery
Domestic Abuse	Mental Health

- Ensuring that staff understand, through regular training and updates, the need to be alert to mental health as a possible safeguarding concern. Mental health difficulties can, in some cases, be an indicator that an individual is suffering, or is at risk from abuse. It may also highlight individual's needs that are not being met. It is important to note that staff are not expected to be trained to diagnose mental health difficulties or conditions, however they are best placed to notice behaviours that may be of concern and report them using the safeguarding or protection from harm procedure.
- Operating effective and proactive policies and procedures across all levels of the provision. This includes clear procedures for responding to and reporting allegations, concerns or disclosures relating to abuse. This also includes operating and safer recruitment processes which are in accordance with Keeping Children Safe in Education (September 2024) and Keeping Children Safe in Education 2023 Supplementary Guidance.
- Listening and responding to students by acknowledging and valuing all forms of communication, including verbal, non-verbal, assistive and augmentative communication, and behaviour.



Therapeutic Learning Service

- Ensuring that perceived boundaries of education and learning are challenged to support individuals to reach their potential. This includes providing learning experiences based on Spiritual, Moral, Social and Cultural (SMSC) values to foster environments based on mutual respect, tolerance, understanding and equality for all.
- Operating a comprehensive range of general and personalised individual student risk assessments, to ensure students are safe whilst accessing provisions or undertaking related activities. These are updated and reviewed regularly, in line with new safeguarding-related information. These are also readily available to staff who require them.
- Providing clear guidance surrounding the provision of in person and remote learning, in order to ensure that students who are unable to access education are supported appropriately and safeguarded.
- Ensuring that all staff are provided with Kite TLS ID badges.

13. Recognition and Protection of Vulnerable Groups

Kite TLS recognises that there are some individuals who are more susceptible and vulnerable to abuse.

We specifically acknowledge that many individuals who access the provision are diagnosed with special educational needs or disabilities and therefore may be especially vulnerable to abuse.

Kite TLS ensures that all staff are provided with comprehensive training that gives them the tools, understanding and ability to recognise, respond to and report concerns at the earliest possible opportunities.

We recognise that having an allocated social worker is an individuation of heightened risk for a child, young person or adults at risk. This may consequently mean that they are more vulnerable to further harm, as well as facing additional educational barriers to attendance, learning and engagement. It may also mean that they are more vulnerable to experiencing difficulties with mental health and wellbeing.

Kite TLS has also appointed a Designated Person (DP) for Children Looked After. The named DP for Children Looked after is Laura Kerbey.

The Designated Person for Looked After Children works in collaboration with the Virtual School representatives, Local Authority and any other nominated professionals engaged with the child, young person or adult at risk. They also have responsibility for tracking and monitoring the attainment and progress of Children Looked After (CLA) and Children Previously Looked After (CPLA). This is to ensure that the provision effectively promotes the educational attainment, achievement and welfare of these specific groups and that where required, additional support and interventions are implemented to ensure that they fulfil their potential.



Therapeutic Learning Service

14. Safeguarding and Protection from Harm – Recognising Abuse

Abuse is a form of maltreatment of a child, young person or adult at risk. Somebody may abuse or neglect a child, young person or adult at risk by inflicting harm or by an act of omission by failing to act to prevent harm.

Abuse can happen at any time and in any setting. Staff should maintain an “it could happen here” attitude and be professional and vigilant surrounding the possible signs and indicators of abuse.

Child abuse can and does happen to children from any background, ethnicity or faith, however there are some individuals whose personal circumstances make them more vulnerable to abuse.

Below are some definitions of abuse:

Physical abuse:

A form of abuse which 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:

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child’s emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate. It may feature 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 from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

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 or not 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. They may also include 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



Therapeutic Learning Service

grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

Neglect:

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, for example, 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); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

The definitions provided above have been directly quoted from the Department of Education, statutory guidance from schools and colleges "Keeping Children Safe in Education (September 2023)"

Common Signs of Abuse:

Some common signs that there may be something concerning happening in an individual's life include:

- Any unexplained changes in behaviour or personality
- Becoming withdrawn
- Seeming anxious
- Becoming uncharacteristically aggressive
- Lacks social skills and has few friends
- 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
- Self-harm
- Substance misuse
- Isolating themselves from others
- Changes to physical appearance
- Bruising or injuries
- Unexplained injuries or injuries that appear to have a pattern

These signs do not necessarily mean that a child is being abused. It is important to understand that there may be other things happening in their life that may be affecting their behaviour; however, staff should always raise concerns relating to any of the above with their Designated Safeguarding Lead.



Therapeutic Learning Service

Concerns may also arise from the behaviour of adults who you know have children in their care, which makes you concerned for the child/children's safety and wellbeing.

It is important to recognise the multitude of abusive situations that overlap within these definitions and that those who are or have been abused, will likely have experienced a number of types of abuse through varied methods.

We know and recognise that individuals who have experienced or are experiencing abuse, can suffer from serious and potentially devastating long lasting effects that can continue into adulthood. Kite TLS is committed to doing everything possible to ensure

that children, young people and adults at risk are protected from abuse and that necessary protective and proactive action is taken to achieve this.

15. Safeguarding and Protection From Harm – Responding to Abuse

Staff are aware that students may experience significant barriers to disclosing abuse. For example, they may:

- Feel that they will not be taken seriously
- Feel too embarrassed to talk to an adult about a private or personal problems
- Worry about confidentiality and who will find out if they tell someone
- Lack trust in the people around them (including parents) and in the services provided to help them – some children who have negative interactions can be reluctant to engage in support.
- Fear the consequences of asking for help – they may have been told that something bad will happen to them if they speak out
- Worry they will be causing trouble and making the situation worse
- Find formal procedures overwhelming and distressing
- Worry that they are upsetting someone – this is particularly relevant for individuals who are being abused by family members

Kite TLS strives to provide environments that individuals feel safe, valued and secure in. We want all children, young people and adults at risk to feel nurtured and cared for and consequently to be able to put their trust and confidence in us. We want them to feel sure that they can approach staff with any worries or concerns they may have and know that they will be listened to, taken seriously and responded to appropriately. All staff must therefore know what to do if someone chooses to talk to them about any matter; but particularly in relation to safeguarding concerns.

Staff may become aware of abuse, or concerned that a child, young person or adult at risk may be at risk of abuse, through a variety of ways, including:



Therapeutic Learning Service

- Disclosures from a child, young person or adult at risk
- Disclosures from parents, family or legal guardians
- Disclosures from other professionals
- Disclosure from another person (friend/ neighbour/ taxi driver/ babysitter etc)
- Discovery of physical evidence of harm – such as bruises or marks on an individual's body. Particular attention should be paid to injuries that occur to both sides of the body, soft tissue or appear to have regular patterns. Any untreated injuries and also injuries that have been delayed in presentation should also raise concerns and be reported without delay. Any bruising found on a non-mobile baby, child, young person or adult at risk should be recorded as a safeguarding concern IMMEDIATELY and in ALL cases. Further to this, if there is any evidence to suggest that an individual has been subject to, or is at risk from, Female Genital Mutilation this must be IMMEDIATELY reported in ALL cases
- Unexplained changes in behaviour or personality
- Evidence of disturbance or explicit detail in drawing, writing or play (this is more prominent in younger children where they display age-inappropriate behaviours)
- Evidence of neglect – uncleanliness, poor personal hygiene, failure to thrive or apparent exposure to unnecessary risks

When listening to a disclosure of abuse, staff must:

- Listen without judgement or interruption
- Remain calm and use positive body language to show that you are actively listening
- Avoid asking leading questions. Any questions that you do use, should be open and should be used for clarification purposes only
- Wait to seek help until after the disclosure has been made. If you stop a disclosure before the individual has finished and is ready, you may miss out on vital information, and they may not want to discuss it at a later time
- Respect the individual's right to privacy but do not promise confidentiality
- Reassure the person making the disclosure that they have done the right thing in sharing the information and that it is not their fault.
- Explain to the individual that in order to keep them safe from harm, the information has to be shared and must be passed on to someone who can help them (Kite TLS Designated Safeguarding Lead)
- Report what has been disclosed to the Designated Safeguarding Lead (or deputies) as soon as possible
- Record in writing, as soon as practicable (but within 24 hours) what was said, using the individual's words where possible
- Staff should share any concerns they have about a child with the Designated Safeguarding Lead. However, it should be remembered 'that sometimes children will not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful...This should not prevent staff from having a professional curiosity and [speak] to the DSL'.



Therapeutic Learning Service

- Remember that if there is an immediate risk of significant harm to an individual, contact emergency services immediately and without delay. Report your actions to the Designated Safeguarding Lead immediately following this to access support

Remember your role is to record and report concerns to the Designated Safeguarding Lead or Safeguarding Team. **IT IS NOT TO INVESTIGATE CONCERNS.**

16. Safeguarding and protection From Harm – Reporting and Recording Concerns

Concerns about abuse can arise through a variety of ways and in a range of different settings.

Whenever a member of Kite TLS has concerns surrounding abuse, they must report this concern to the Designated Safeguarding Lead, or in their absence, a member of the Safeguarding Team, as soon as possible.

A confidential written report on the incident should be completed as soon as possible. This report must be made available as soon as possible to the Designated Safeguarding Lead.

The person who observed the incident must make an accurate written report detailing their concerns on the Safeguarding Concern Report Template. This must be submitted to the Designated Safeguarding Lead who will make any necessary additional reports regarding actions taken and decisions made relating to the concern.

The Designated Safeguarding Lead will be responsible for ensuring that KITE TLS Directors are informed of all allegations or suspicions of abuse.

KITE TLS has a responsibility to share allegations, concerns or disclosures of abuse with relevant external agencies in the best interests of the child. The Designated Safeguarding Lead and Safeguarding Team will consult as to whether, following an investigation into the concern, it is appropriate to refer the concern to the local Safeguarding Board. This would allow them to consider what, if any, further action should be taken. All decisions relating to safeguarding concerns and referrals will be documented, regardless of their outcome, in the student's Safeguarding File.

In Surrey, all referrals are made through the Multi Agency Safeguarding Hub (MASH). If the student resides in another borough the referral should be made to that borough.

Social Services must be contacted about any allegations or suspicions of abuse. This will usually be done by the Designated Safeguarding Lead or Deputy Designated Safeguarding Leads in the absence of the DSL. When contacting Social Services (or any other relevant external agencies, such as the police) the details of this communication and contact will be recorded.



Therapeutic Learning Service

Following any necessary referrals to external agencies for support, KITE TLS will stay closely involved and check with the appropriate authorities that action is being appropriately taken to support the individual.

All records relating to student safeguarding or welfare concerns will be retained in the student's individual Safeguarding File. This file will be held separately to the student's main file. Safeguarding files will be stored in secure fashion and are only accessible to the Designated Safeguarding Team. They will clearly be marked as "confidential".

Relevant staff will be made aware when a student is subject to support from Social Services. This is to ensure that staff can effectively support the student and be vigilant surrounding any emerging concerns.

Records relating to the student's welfare will remain on the student's file as long as the individual continues to be supported by Kite TLS as a provision.

When a student ceases being supported by Kite TLS, other providers will be advised in writing that the organisation's records contain information about child protection/safeguarding concerns, even where these may no longer be current.

Files will be transferred to the new placement or provision in line with GDPR and Data Protection rules and regulations.

Immediate or Urgent Response to Safeguarding Concerns:

Kite associates are not trained for situations which require physical intervention. However, in the event of a situation arising that was unforeseen, reasonable force can be used to prevent children and young people from hurting themselves or others, from damaging property, or from causing disorder, in line with Government guidelines. The decision on whether or not to physically intervene is down to the professional judgement of the associate concerned and should always depend on the individual circumstances. If such an unforeseen event occurs, Kite TLS associates, at the earliest safe opportunity should call 999 immediately to explain the situation.

Following this sort of serious incident, the safeguarding reporting procedure must be followed, and a review and update of the child or young person's risk assessment must be completed to establish whether Kite TLS is able to continue to meet the child or young person's needs.

Prevent Duty:

Kite TLS also recognises and adheres fully to the Prevent Duty (Sep 2023 - last updated Jan 2024). This places a duty on educational provisions to have due regard to the need to prevent individuals from being drawn in terrorism.



Therapeutic Learning Service

Radicalisation (the act or process of making a person more radical or favouring of extreme or fundamental changes in political, economic or social conditions, institutions or habits of the mind) and extremism (the holding of extreme political or religious views) are increasingly recognised as serious threats to the safety and wellbeing of children, young people, adults at risk and families.

Kite TLS are aware that children and young people with SEND may be more vulnerable to extremism and radicalisation. To that end, we are committed to safeguarding students from radicalism and extremism.

Safeguards in place include:

- All staff have an understanding of their roles and responsibilities in regard to the Prevent Duty and Channel process
- All staff are aware of what radicalisation is and why we need to be vigilant in organisation
- All staff know how to identify any possible concerns e.g. changes in students' behaviour which could indicate a need for help or protection; and how to report any concerns to the DSL so that further safeguarding action (including a Prevent referral) can be taken if necessary
- All students, parents/carers and families know that Kite TLS has policies in place to keep students safe from harm and that these policies, procedures and systems are regularly reviewed to ensure they are appropriate and effective
- KITE TLS ensures that its provision actively promotes the understanding of British values including democracy and the rule of law, as well as supporting our
- students to develop good self-esteem and positive relationships with peers and other members of their communities

Where a criminal offence is suspected:

Wherever a criminal offence is alleged or is suspected to have taken place, Kite TLS has a responsibility to share this information and report it to the police, social care and Local Authority Designated Officer (where it pertains to a member of staff).

17. Contact with the Family:

Kite TLS prides itself on the relationships it develops with parents, carers and families when working with their children, young people or adults at risk. However, it is important to understand then, when managing potential concerns relating to abuse, that Kite TLS has a statutory responsibility to ensure that all actions taken are in the best interests of the child.

Following concerns being raised, contact or communication with the family of the student should be discussed with the Designated Safeguarding Lead.



Therapeutic Learning Service

Communication and or consent will be sought from families, in all instances where it is deemed appropriate and safe to do so, in advance of a referral being made. The exception to this is incidents of concern where there is a suspicion that in doing so, it may increase the risk to the individual. Where there is a concern that this is the case, a referral will be made by the Designated Safeguarding Lead and advice will be sought from appropriate services regarding whether it is appropriate to share concerns.

In cases where a minor physical injury causes concern, it may be appropriate to discuss this with the parent or carer. If the explanations suggest a non-accidental cause for the injury, failure to protect the individual from known risks, or it appears inconsistent with the injury sustained, the concern will be forwarded immediately to the appropriate Social Services.

In cases where there are suspicions of sexual abuse the Designated Safeguarding Lead will always seek immediate advice and support from Social Services before discussing the matter with the family.

18. Child Protection Plans

Kite TLS will be informed by the relevant Social Services department where a student is subject to a Child Protection Plan. The name of the identified social worker will be clearly indicated on the student's record. Other relevant documentation will be stored on the individual's Safeguarding File.

Kite TLS is committed to working collaboratively with external agencies and will participate fully in the work of the core group, to assist with the objectives of the Child Protection Plan.

When a student is on a Child Protection Plan Kite TLS will report all absences, behaviour changes or other concerns without delay to the allocated Social Worker.

As with all student's safeguarding files, where a student leaves Kite TLS provision all safeguarding information will be transferred to the new placement.

19. Requests for Assistance from External Agencies

Kite TLS has a duty to assist Social Services or the Police when they are making enquiries about the welfare of individuals.

Requests for information must be provided in writing, addressed to the Designated Safeguarding Lead.

Information must not be provided unless authorised by the Designated Safeguarding Lead. If a staff member receives a request for information, they must forward it immediately, without delay, to the Designated Safeguarding Lead for the request to be confirmed and actioned.



Therapeutic Learning Service

Requests for attendance to meetings surrounding individual students received by staff (for example Child Protection conferences or reviews) should be redirected to the Designated Safeguarding Lead. The DSL will arrange preparation of a report, where appropriate, in consultation with relevant staff. The Designated Safeguarding Lead, or a member of the Safeguarding Team, will attend the meeting.

Requested reports should contain information relating to the student. Below is an example of the information that should be included within a report:

- Student Name
- Student Date of Birth
- Date of Admission
- Observations of – Academic Progress/ Attendance/ Behaviour/ Relationships with peers and adults/ Areas of strength/ Identified protective factors/ Family dynamics/ Consider contextual safeguarding/ Current targets or Goals

Reports should be objective, and should clearly distinguish between facts, observations, allegations and opinions.

It is important to note that these reports (and any other reports or records relating to safeguarding and child protection) will be shared amongst relevant professionals and could be used in legal proceedings as evidence.

20. Online Safety

It is essential that children are safeguarded from potentially harmful and inappropriate online material. An effective whole school and college approach to online safety empowers a school or college to protect and educate pupils, students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

content: being exposed to illegal, inappropriate, or harmful content, for example:

pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.

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 non-consensual 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 you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).



Therapeutic Learning Service

21. Managing Allegations of Abuse Against Staff

Kite TLS Directors or the Designated Safeguarding Lead should inform the accused person about the allegation as soon as possible. However, this must first have been authorised by the Local Authority Designated Officer.

The subject of the allegations (whether suspended or not) shall be:

- Advised to contact their trade union or professional association to seek legal advice and support
- Treated fairly and honestly
- Supported to understand the concerns expressed, processes involved and possible outcomes
- Be kept informed of the progress of the investigation and case
- Be clearly informed of the outcome of any investigation and the implications for disciplinary or related processes
- Be provided with support as appropriate

Suspension

Consideration must be given as to whether it is necessary to remove the subject of the allegations from contact with students pending investigation and procedures arising from the allegation.

Suspension should not be automatic. It should be considered if any of the following applies:

- There is a cause to suspect a student is at risk of significant harm
- The allegation warrants investigation by the police or another external agency
- The allegation is so serious that there may be grounds for dismissal

The decision that suspension is necessary should be made in consultation with the Local Authority Designated Officer. It will take into account the safety of the individuals involved and the impact of any enquiry.

Written confirmation of suspension will be provided. The letter should be dispatched within 24 hours detailing the reasons for suspension. The individual should be informed who their named contact is within the organisation who can provide support during this time.

Further Action

Kite TLS can only undertake an investigation into allegations of abuse against staff in situations where the Local Authority Designated Officer has considered the case and indicated that it is appropriate to do an internal investigation.



Therapeutic Learning Service

Where internal investigations are directed by the Local Authority Designated Officer it is necessary for all actions to be documented in full. Once the investigation has been concluded and an outcome has been reached, a summary report must be provided to the Local Authority Designated Officer. Copies of these reports should also be held on the staff member's personnel file.

Kite TLS will abide by the legal duty outlines in Keeping Children Safe in Education (September 2024) and KSCIE 2023 Supplementary Guidance to refer to the DBS anyone who has harmed, or poses a risk of harm, to children or adults at risk where:

- The harm test is satisfied in respect of that individual (this will be decided by the Local Authority Designated Officer)
- The individual has received a caution or conviction for the relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence; and
- The individual has been removed from working (paid or unpaid) in regulated activity or would have had they not left

22. Data Protection, GDPR and Information Sharing

Kite TLS follows all guidance and legislation relating to Data Protection, GDPR and Information Sharing.

Information regarding students including their personal details, circumstances and academic progress will be processed securely and in compliance with GDPR regulations.

Where possible and appropriate, individuals will be asked to give their explicit consent to process their sensitive or personal data relating to safeguarding. However, it is important to note that where there are concerns relating to the safety and wellbeing of an individual, consent is not necessarily required and will not prevent actions that are required to be taken to minimise suspected risk of harm.

Kite TLS will process and share sensitive and/or personal data without consent where it is necessary for the purpose of:

- Protecting an individual from neglect or physical, mental or emotional harm; or
- Protecting the physical, mental or emotional wellbeing of an individual

23. Staff Training

All staff must read and sign the latest version of the Department of Education's statutory guidance 'Keeping Children Safe in Education' (KCSIE - September 2025, Part One).



Therapeutic Learning Service

All staff are provided with appropriate safeguarding and child protection training at induction and annually thereafter. This will include online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring. They must also access and engage in training provided, relating to the Prevent Duty and Channel. Additional training is provided where required or where information, best practice, guidance or legislation pertaining to these topics is updated. All staff receive safeguarding and child protection (including online safety) updates, (for example, via email and e-bulletins, and inset training), as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively.

All staff must ensure that they are aware of the latest updates and additions to the KCSIE 2025 Document and attend training in relation to the updates which include:

Clarification around the roles and responsibilities of education staff in relation to filtering and monitoring. This is in relation to ensuring that harmful or inappropriate content is blocked from laptops and that staff are vigilant in regards to access to their own laptops when working with KITE clients.

Clarification that being absent, as well as missing from education can be a warning sign of a range of safeguarding concerns, including sexual abuse, sexual exploitation or child criminal exploitation.

Additional information on pre-recruitment checks for shortlisted candidates.

Information on responding to allegations related to organisations or individuals using school premises.

Upon induction (or upon the review of an essential policy or procedure) staff are required to read all safeguarding related policies and procedures and to sign and date a central record confirming that they have read these and understand their roles and responsibilities.

In addition to the training provided, staff are able to seek ongoing support, advice and guidance from the Designated Safeguarding Lead or Safeguarding Team regarding safeguarding and child protection.

19 September 2023 – Updates to KCSIE 2023:

- No external visitors should be observing sessions unless they have identified themselves and signed in
- The guidance reminds organisations that in June 2022, the Sexual Offences Act 2003, was changed to include a broader range of roles in the 'position of trust' offence. In addition to teachers, these rules now prevent adults from engaging in sexual activity with a person who is 16 or 17 years old who they are coaching, teaching, training, supervising or instructing in a sport or religion.



Therapeutic Learning Service

Updates to KCSIE 2024:

The following link will provide information about the main changes in the KCSIE document relevant from September 2024 and must be read and understood by all Kite TLS associates:

[Keeping Children Safe in Education 2024: Main changes and what next \(brownejacobson.com\)](https://www.brownejacobson.com/keeping-children-safe-in-education-2024-main-changes-and-what-next)

The changes to KCSIE 2024 are:

“Areas of minimal change.

It’s good to know about the parts that have had no changes at all, or no substantive changes. Part three (safer recruitment) and Part four (allegations and low-level concerns) fall into this category, with no changes made to either part.

We can add part five too, which only has one tweak to paragraph 497 (Early help) to reflect the wording used in the updated Working Together guidance.

“The main changes:

So that just leaves us with parts one and two, which do have a few changes and a few more tweaks. These are the three main changes:

1. Children who are lesbian gay, bisexual, or gender questioning – an expected update following publication of the Cass review report. The changes are in paragraphs 205 – 209. The main substance of those new paragraphs is recommending that schools exercise caution because of the many unknowns about the impact of social transitioning, and so schools can consider the broad range of needs that child may have. This should be done in partnership with parents “other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child”.

Do note that these amendments remain under review pending the outcome of the gender questions children guidance consultation.

2. Abuse and neglect – not so much a major change, but one that can trip you up when it comes to amending policies and ensuring staff are using the right terminology: the 2024 guidance renames this section as ‘Abuse, neglect and exploitation’ and uses that language throughout the guidance (see paragraphs 19, 66 and 202, and Annex A). In terms of impact, it’s not a major change, but getting the risk of missing it and getting it wrong in policy and training makes it worth a formal mention here.

3. Alternative provision – a new paragraph (171) has been added to make clear that where a school places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupil’s needs. We knew that already, but the inclusion in the guidance shows the importance of this point.



Therapeutic Learning Service

Before we look at what you need to do now, let's cover off the minor changes to KCSIE 2024.

Data Protection – a small addition (paragraph 93) that simply directs you to the DfE Data Protection guidance for schools for more information in data protection compliance.

Domestic abuse – an important addition to paragraph 24 to reflect that seeing, hearing and experiencing the effects of domestic abuse can impact on children.

Early help – an additional bullet point has been added to paragraph 18 to include children who have experienced multiple suspensions or are at risk of being permanently excluded.

Absence from education – a change in terminology from “deliberately missing education” to “unexplainable and/or persistent absences from education”.

Children and the court system – links to two age-appropriate guides have been added to Annex B to help explain the court process to children in those age brackets.

Preventing radicalisation – a change in terminology in Annex B from “radicalisation into terrorism” to “extremist ideology and radicalisation”, and inclusion of the new definition of radicalisation from the 2023 guidance.

DSL holding and sharing information – an addition in Annex C is that designated safeguarding leads (DSLs) should note discussions and decisions made, including the rationale for those decisions, to include instances when referrals were not made.

Updates to KCSIE 2025:

These include:

- The DfE's Working together to improve school attendance is now statutory guidance
- Changes to the list of content risks under online safety, adding in disinformation, misinformation and conspiracy theories
- More information on the DfE guidance on generative artificial intelligence (AI)
- Additional information on, and clarity around, alternative provision guidance
- Clarity on Virtual School Heads and their non-statutory responsibilities around children in kinship care.

The following links will provide information about the main changes in the KCSIE document relevant from September 2025 and must be read and understood by all Kite TLS associates:

[Keeping children safe in education \(KCSIE\) 2025: summary of changes | NSPCC Learning](#)

<https://www.safeguardingschools.co.uk/dfeai>



Therapeutic Learning Service

<https://www.iwf.org.uk/resources/ai-generated-child-sexual-abuse-material-professionals-resource/>

Safer Recruitment of Staff

- Kite TLS recruitment is always conducted in accordance with Safer Recruitment procedures. Kite TLS follows all safer recruitment guidance with regards to the recruitment, selection and appointment of all staff and volunteers.
- All applicants are required to complete a full and comprehensive application form using the format provided. CV's and covering letters will not be accepted.
- Every interview panel has at least one member who is Safer Recruitment trained.
- References may be taken up on shortlisted applicants prior to interview. Please note that no questions will be asked about health or medical fitness prior to any offer of employment being made.
- All offers of engagement will be subject to the receipt of a minimum of two references, covering a period of at least 3 years, which are considered satisfactory by Kite TLS. One of the references must be from the candidate's current or most recent employer.
- All referees will be asked whether they believe the applicant is suitable for the job for which they have applied and whether they have any reason to believe that the applicant is unsuitable to work with children.
- References will only be accepted if completed using the correct template provided by Kite TLS.
- Kite TLS will only accept references obtained directly by the referee. ID verification may be sought during this process.
- Kite TLS will ensure that all individuals hold appropriate enhanced DBS certificates and that these are renewed as necessary.
- Where an individual does not hold a valid DBS certificate, Kite TLS will support them to apply for one.
- All candidates will be asked on the application form and at interview, if there are any relevant details or information pertaining to their social media activities and web presence that they wish to disclose. They will be informed that Kite will run necessary social media checks.
- Individuals will not be able to start work for Kite TLS until all satisfactory background checks have been completed. In exceptional circumstances, it may be possible that whilst background checks and relevant paperwork is being completed that individuals may begin to operate under a Risk Assessment that is signed off by Kite TLS and Parents/ Carers in the short term.
- It is a condition of employment that staff provide Kite TLS with the original disclosure certification as soon as practical after the certificate is received so that confirmation of appropriate background checks can be done. Offers of engagement will remain conditional until this has been completed.
- Where applicants are asked to provide further overseas information this will include, where available, a criminal record check from the relevant jurisdiction(s) or a certificate of good conduct (as appropriate) and / or references from any employment held. Reference will be made to the Home Office Guidance on



Therapeutic Learning Service

criminal records checks for overseas applicants. It is recognised that such checks can take time and in exceptional circumstances and, depending on how long the applicant has worked or lived outside the UK, a risk assessment may be undertaken. However, for those entering the country after a significant period of employment in another country, work can only commence once sufficient overseas information has been received and only if Kite TLS has considered that information and confirmed that the applicant is suitable to commence work with the organisation

- Kite TLS will check whether staff who carry out “teaching work” as defined in Keeping Children Safe in Education (September 2025) are prohibited from doing so. Kite TLS uses the Teaching Regulation Agency (TRA) system to check whether successful applicants are the subject of a prohibition, or interim prohibition order issued by a professional conduct panel on behalf of the TRA.
- Kite TLS is legally required to undertake the above pre-employment checks. Therefore, if an applicant is successful in their application, the organisation will retain on their personnel file any relevant information provided as part of the application process. This will include copies of documents used to verify identity and right to work in the UK. This documentation will be retained by Kite TLS for the duration of the successful applicant’s employment with the organisation. If the application is unsuccessful, all documentation relating to the DBS application will be destroyed immediately in accordance with GDPR regulations.
- Kite TLS maintains a Single Central Record in compliance with Keeping Children Safe in Education (September 2025).

Regarding advertising from the KCSIE doc 2025, Kite TLS should think about / include the following information when defining the role (through the job or role description and person specification):

- The skills, abilities, experience, attitude, and behaviours required for the post, and the safeguarding requirements, i.e. to what extent will the role involve contact with

children and will they be engaging in regulated activity relevant to children. The advert should include:

- The school or college’s commitment to safeguarding and promoting the welfare of children and make clear that safeguarding checks will be undertaken
- The safeguarding responsibilities of the post as per the job description and personal specification, and
- Whether the post is exempt from the Rehabilitation of Offenders Act (ROA) 1974. The amendments to the ROA 1974 (Exceptions Order 1975, (amended 2013 and 2020)) provide that when applying for certain jobs and activities, certain spent convictions and cautions are ‘protected’, so they do not need to be disclosed to employers, and if they are disclosed, employers cannot take them into account. The MOJ’s guidance on the [Rehabilitation of Offenders Act 1974 and the Exceptions Order 1975](#), provides information about which convictions must be declared during job applications and related exceptions and further information about filtering offences can be found in the [DBS filtering guide](#).



Therapeutic Learning Service

24. Policy Review Details

Reviewed and approved by:

Name	Date	Role	Signature
Laura Kerbey	19.01.2026	Designated Safeguarding Lead and KITE TLS Director	
Andrea Haybittle	19.01.2026	Designated Safeguarding Lead and KITE TLS Director	

Reviewed and Updated:

2 December 2022
24 July 2023
14 October 2023
29 February 2024
4 July 2024
2 August 2024
29 July 2025
19 January 2026

Next Review Date: August 2026

25. Appendix A: Further Information, Advice and Guidance

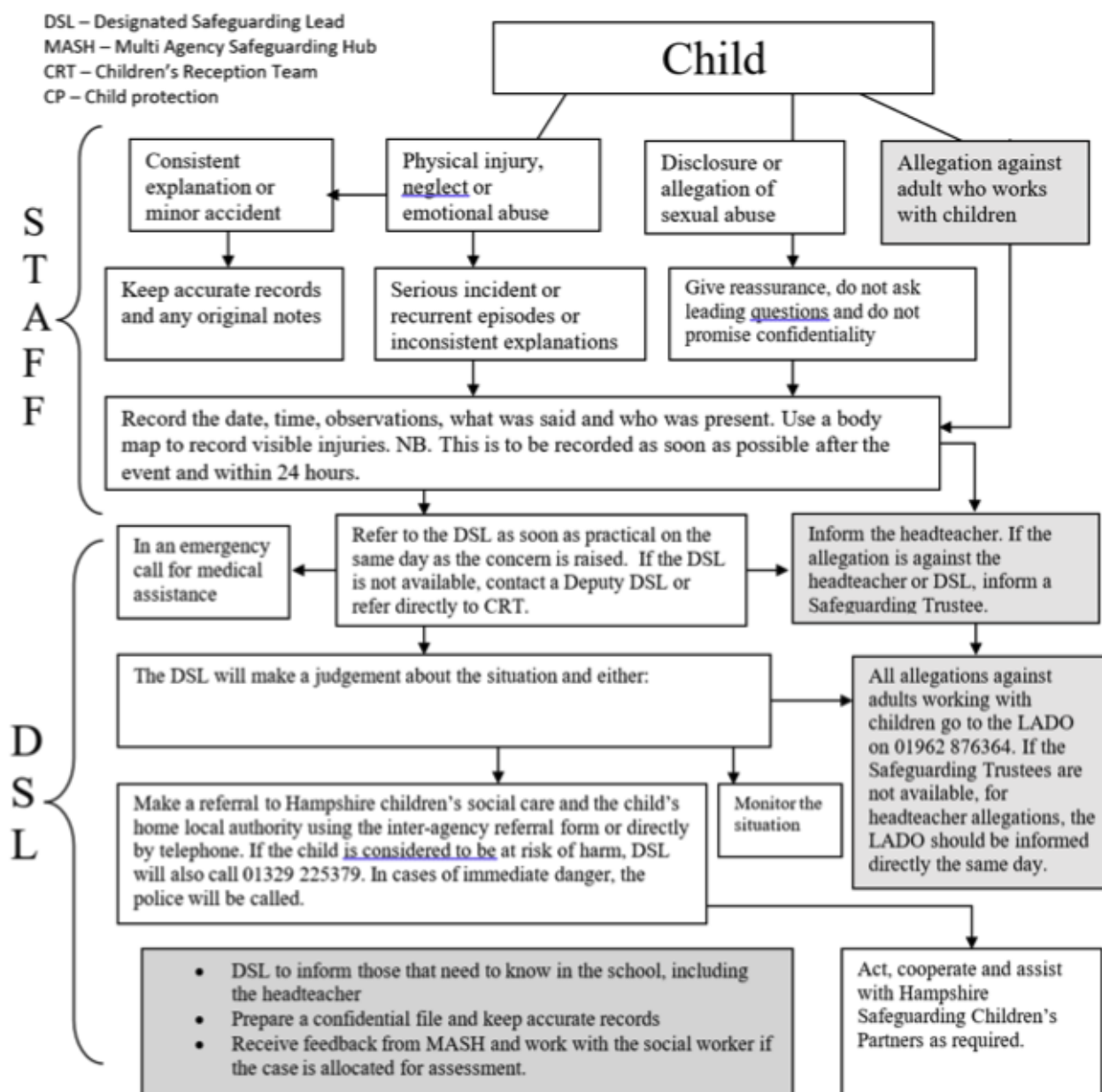
- Keeping Children Safe In Education (DfE, September 2025)
[Keeping children safe in education 2025](#)
- Keeping Children Safe in Education Part 1 (DfE September 2025)
[Keeping children safe in education 2025: part one information for all school and college staff](#)
- Keeping children safe in education (KCSIE) 2025: summary of changes
[Keeping children safe in education \(KCSIE\) 2025: summary of changes | NSPCC Learning](#)
- The Prevent duty: an introduction for those with safeguarding responsibilities (DfE 7 September 2023)
[The Prevent duty: an introduction for those with safeguarding responsibilities - GOV.UK](#)



Therapeutic Learning Service

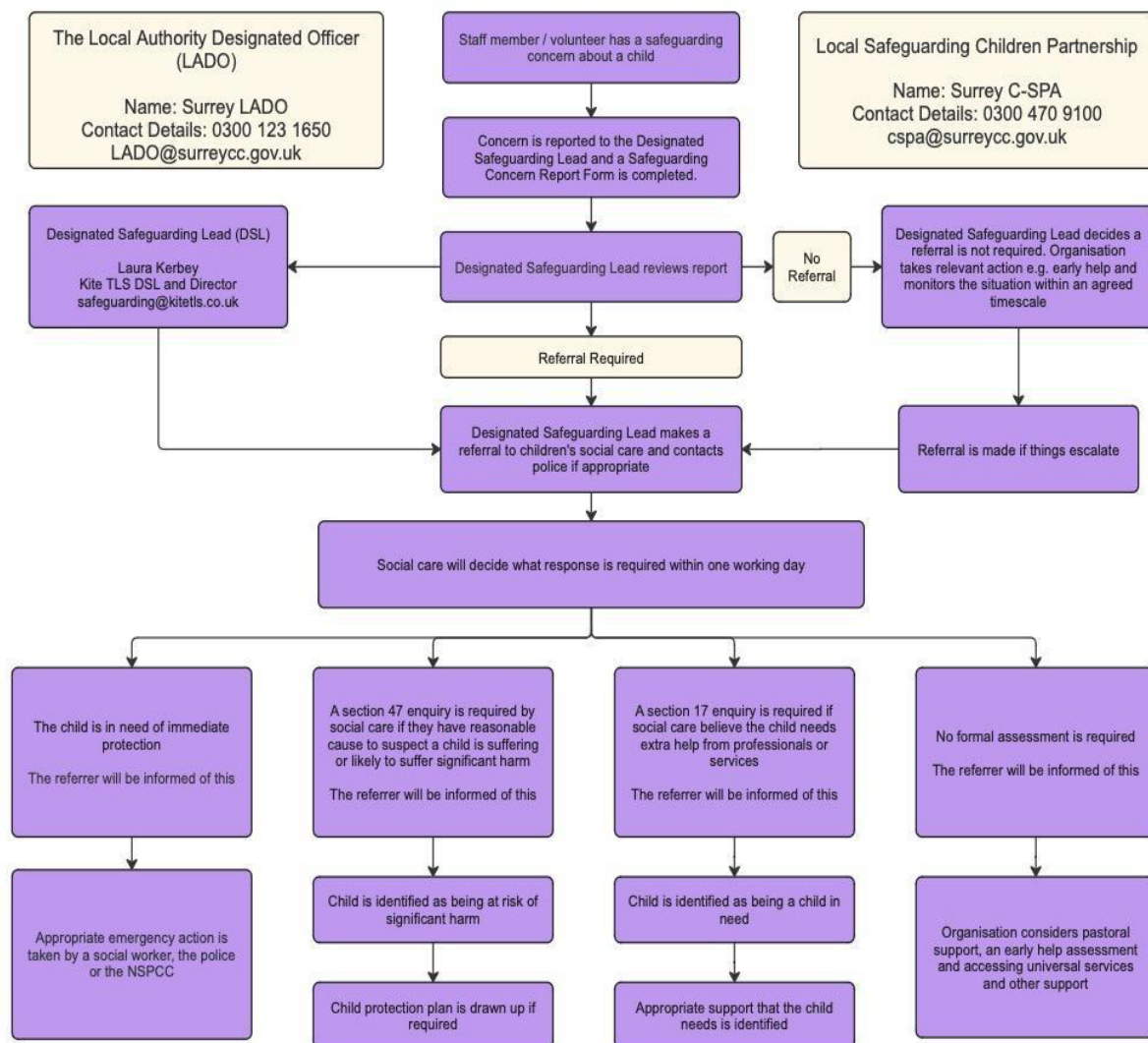
- Lessons for Prevent (July 2025)
[Lessons for Prevent 13 July.pdf](#)
- Working together to safeguard children (DfE December 2023)
[Working together to safeguard children 2023 - statutory guidance.pdf \(publishing.service.gov.uk\)](#)
- What to do if you're worried a child is being abused (DfE March 2015)
[What to do if you're worried a child is being abused.pdf \(publishing.service.gov.uk\)](#)
- Child sexual exploitation: definition and guide for practitioners (DfE February 2017)
[CSE Guidance Core Document 13.02.2017.pdf \(publishing.service.gov.uk\)](#)
- Criminal exploitation of children and vulnerable adults: county lines (Home Office, Oct 2023)
[Criminal exploitation of children and vulnerable adults: county lines \(accessible version\) - GOV.UK](#)
- Multi Agency Statutory Guidance on Female Genital Mutilation (HM Government 2020)
[6.7166 HO FBIS BN O Leaflet A4 FINAL 080321 WEB.pdf \(publishing.service.gov.uk\)](#)
- After-school clubs, community activities, and tuition Safeguarding guidance for providers (September 2023)
[After-school clubs community activities and tuition safeguarding guidance for providers.pdf](#)
- Information Sharing (May 2024) – Advice for practitioners providing safeguarding services to children, young people, parents and carers (May 2024)
[Info sharing advice content May 2024.pdf \(publishing.service.gov.uk\)](#)
- Keeping children safe in Education (KCSIE 2024): The main changes and what to do next
[Keeping Children Safe in Education 2024: Main changes and what next \(brownejacobson.com\)](#)

26. Appendix B1: Hampshire Safeguarding Concern Procedure Flowchart for Child Protection



* In the cases of known FGM, the member of staff who was made aware will also make contact with the police.

27. Appendix B2 – Surrey Safeguarding Concern Procedure Flow Chart



All concerns and correspondence will be kept in a secure, confidential file. The child's circumstances will be kept under review at all stages and a referral will be made again if it is appropriate for improving the child's circumstances. The child's best interests must always come first.

If the concern is about a staff member / volunteer in your organisation, the DSL should refer this to the LADO who will determine the best route of action to be taken.

If your concern would involve a Prevent / Channel referral, contact:
Laura Kerbey
Kite TLS DSL and Director
safeguarding@kitetls.co.uk

If you have a concern that a girl has undergone, or is about to undergo FGM, contact:
Laura Kerbey
Kite TLS DSL and Director
safeguarding@kitetls.co.uk



Therapeutic Learning Service

28. Appendix B3 - SCC Guidance on Safeguarding Concern for a Looked After Child (LAC), Arising during a 1-2-1 Session

Please see below the SCC guidance to follow when tutoring a LAC, and information on what you need to do should you need to raise a safeguarding concern. Please pay attention to the information you should have with you, prior to tutoring a LAC. If you have any questions regarding the following, please contact your DSL or DDSLs.

1. If you think that a child is in immediate danger you should call 999.
2. Contact the **Children's Single Point of Access (C-SPA)** between 9am to 5pm on Monday to Friday Phone: 0300 470 9100
Email: cspa@surreycc.gov.uk
Please see [Report a concern about a child or young person - Surrey County Council \(surreycc.gov.uk\)](https://www.surreycc.gov.uk/childrens-services/childrens-single-point-of-access) for further details.
3. Out of hours please contact the Emergency Duty Team (EDT) on - 01483 517898.
4. Please ensure that at the start of your tutoring sessions with a looked after child, that you have contact details for the child's social worker and team manager, and the social worker duty inbox address.
5. Where a looked after child shares something which gives you a cause for concern about their safety or welfare during your 121 tutoring session please ALSO (in addition to 2 or 3 above) contact the child's social worker as soon as possible and share your concerns directly with them. Please request a 'read receipt' and ask that they confirm with you the action that has been taken.
6. If you receive an 'out of office' reply from the SW or there is any problem with the contact email, please contact the team manager, or duty social worker inbox and request a 'read receipt' and ask that they confirm with you the action that has been taken.
7. Please notify the Virtual School inbox virtual.school@surreycc.gov.uk of all safeguarding incidents so that we can log them and check that they have been actioned. Our DSL is Anwen Foy Virtual School Head.
8. For general information and contacts - reporting a concern about a child or young person and Surrey's processes, procedures and contacts, please visit the Surrey Education Safeguarding Partnership pages [Children and Young People - Surrey Safeguarding Children Partnership \(surreyscp.org.uk\)](https://www.surreyscp.org.uk)
9. Please ensure your organisation fully meets the requirements of DFE guidance around tutoring [After-school clubs, community activities, and tuition - safeguarding guidance for providers \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/674442/after-school-clubs-community-activities-and-tuition-safeguarding-guidance-for-providers.pdf)

Allegations Made Against a Tutor

If there is an allegation against a member of staff or volunteer, the DSL should contact their local authority designated officer. Your local authority's designated officer coordinates all allegations and concerns made against a person who works with children. They will advise you on what action you



Therapeutic Learning Service

should take and if you need to refer the allegation to children's social care. The DSL should also inform the police if a crime may have been committed.

https://assets.publishing.service.gov.uk/media/6509558022a783000d43e81f/After-school_clubs_community_activities_and_tuition_safeguarding_guidance_for_providers.pdf



Therapeutic Learning Service

29. Appendix C: Further Types of Abuse

Child protection concerns are rarely standalone events that can be covered by one category or definition. In most cases, multiple issues will overlap with one another. For example, a child that is being sexually exploited will experience not only sexual abuse but also physical and emotional abuse.

Below are some further types of abuse and specific safeguarding issues.

Child Exploitation (CE)

Refers to a child or young person being used for someone else's gain. Child exploitation is a form of abuse which can involve sexual, abusive or manipulative behaviour. It normally occurs because of an 'imbalance of power', such as age, physical strength, gender, cognitive ability or access to resources such as food, clothes and a place to stay. There is no single offence of child exploitation, but perpetrators face being investigated for more than one offence, including rape, trafficking, organised gang activity, sexual assault or inciting a child into sexual activity. Child exploitation occurs online and offline, by a group or individual and affects both males and females.

Child Sexual Exploitation (CSE)

Child sexual exploitation is the illegal activity by people who have power over children and young people and use it to sexually abuse them. This can include seemingly consensual relationships or sexual activity in exchange for attention, a place to stay, gifts, money, cigarettes or illegal substances. It can also include serious organised crime.

Child Criminal Exploitation (CCE)

Describes all crime in which an individual is coerced to commit an offence for the benefit of an individual or group who holds more power than they do. Coercion through power can take many forms. The term county lines refers to where children are groomed and coerced into trafficking drugs and money by criminal gangs from major cities who network around the country. County lines is a form of criminal exploitation.

Extremism/Radicalisation

Refers to the process by which a person comes to support forms of extremism and terrorism. Radicalisation can happen in many different ways and settings. Many factors can contribute to a child or young person's vulnerability, including their background, family, friends or online contacts. An extremist or terrorist group may also appear to provide an answer to a child's unmet needs. Staff have a responsibility to report any concerns regarding radicalisation and extremism of children and young people to the Designated Safeguarding Lead.



Therapeutic Learning Service

Child Trafficking and Modern-day Slavery

Children can be trafficked into, within and out of the UK. Children are trafficked for many reasons including: sexual exploitation, domestic servitude, labour, benefit fraud, theft, working in cannabis farms and work in the sex industry.

Fabricated or Induced Illness

Fabricated or induced illness (FI, also known as Munchausen's syndrome by proxy) This is a rare form of child abuse. It occurs when a parent or carer exaggerates or deliberately causes symptoms of illness in a child. According to the NHS, fabricated or induced illness can involve children of all ages, but the most severe cases are usually associated with children under five years.

Breast Ironing / Flattening

This is the practice where a pubescent girl's breasts are ironed, massaged and flattened in order to delay the development of the breasts. The process normally starts at the first sign of puberty and can go on for many years. Breast ironing is a form of physical abuse.

Peer-On-Peer / Child-on-Child Abuse

This can be physical, sexual, emotional and financial abuse. It can also be coercive control exercised between children and young people within their relationships.

Sexual violence and sexual harassment can occur between two children of any sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Sexual violence and Harassment

This can occur face-to-face, online, physically or verbally. It should not be seen as 'banter', 'part of growing up' or 'just having a laugh'.

'Upskirting' is a form of sexual harassment. It normally involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks. 'Upskirting' often occurs in a crowded, public place, making it hard for the victim to know that a photograph is being taken. 'Upskirting' is a criminal offence.

Female Genital Mutilation (FGM)

Involves procedures that include the partial or total removal of the external female genital organs for cultural or other non-therapeutic reasons. It is also known as "female circumcision" or cutting.

FGM has been illegal in the United Kingdom since 1985. The law was strengthened in the 2003 female genital mutilation act to prevent girls travelling from the UK to undergo FGM abroad.



Therapeutic Learning Service

The mandatory reporting duty for FGM requires regulated health and social care professionals and teachers in England and Wales to report known cases of FGM in

under 18-year-olds to the police. This responsibility cannot be transferred. While mandatory reporting is limited to specified professionals, if you suspect that a girl under the age of 18 has had FGM carried out on her or you observe physical signs which appear to show FGM has been carried out, then you should report this to your Designated Safeguarding Lead and involve children's social care as appropriate.



Therapeutic Learning Service

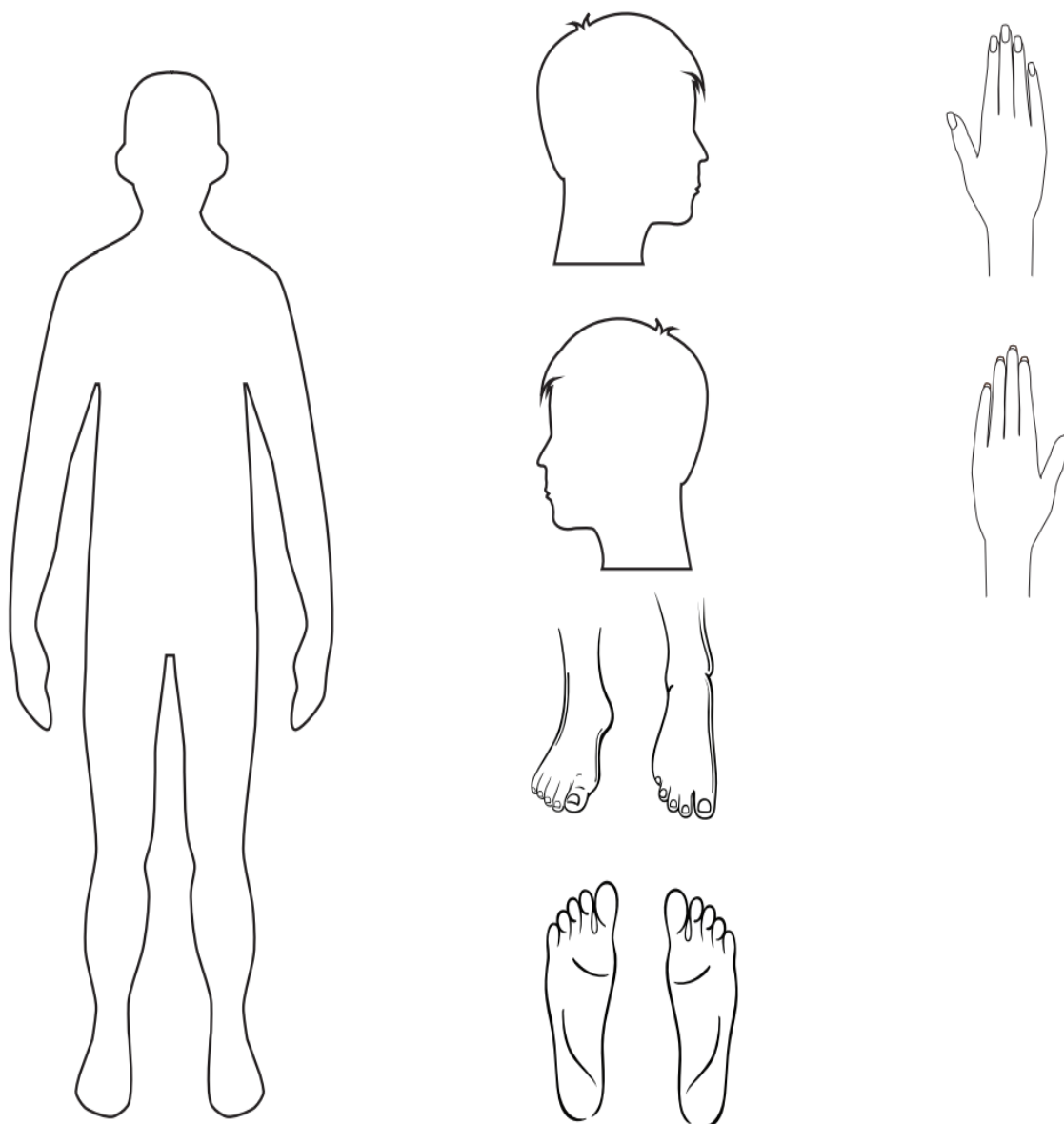
30. Appendix D – Safeguarding Concern Report

Date of report:	<i>Date report has been written and submitted by the member of staff to the Designated Safeguarding Lead</i>
Date of incident:	<i>This is the date that the concern was raised or observed</i>
Location of incident:	<i>Location when the concern was raised or observed</i>

Name of referrer:		Role of referrer:	
Young Person's name, age and DOB:			
Details of Concern:	• <i>Include as much detail as possible regarding your concerns</i> • <i>use body map if appropriate</i> • <i>use initials for other children / young people involved, unless there is a specific need to name them in full</i> • <i>where possible use the exact words spoken by the individual</i> • <i>additional notes, if taken, may be attached to this form</i>		
Main Outcome:	<i>The Student:</i> <i>The Parent / Tutor / LSA:</i>		
Details of what led to a resolution:	<i>The Student:</i> <i>The Parent / Tutor / LSA:</i>		
Staff action moving forward:			
Reported to:		Role of person reported to:	Designated Safeguarding Lead
Signed:			



Therapeutic Learning Service





Therapeutic Learning Service

Designated Safeguarding Lead Section	
Date and time report received by Designated Safeguarding Lead	Name: Date Received:
Is this child known to Social Services?	Yes / No Allocated workers contact details:
Action taken by Designated Safeguarding Lead	All actions taken
Has this concern been discussed with parents?	Yes / NO Comments/ reasons: <i>Include copies of correspondence such as emails or letters within the Student Safeguarding File.</i>
Did the concern meet threshold for a referral?	YES / NO Reason: Date: Time:



Therapeutic Learning Service

	Referred to: Contact details: <i>Ensure that a copy of the referral is included within the Student Safeguarding File</i>
How will this concern be monitored?	<i>Include information on how and by who? Is there a date for review?</i>
Feedback to the member of staff who raised the concern	
Was this concern and the actions taken reviewed by the Safeguarding Team?	Date: Time: Staff: Comments:
Any other notes	
Signed and dated by Designated Safeguarding Lead	Name: Date: Role: