Thought Leadership series
Safeguarding Focus
January/February 2023

We are pleased to be sharing the third and final part of our thought leadership series on safeguarding. Each builds on the previous, to provide you with a thorough and insightful guide to what best practice looks like and how to implement it. They are designed to be practical with clear links and signposting, so you will have all the information you need at your fingertips to raise the quality bar in your organisation and best serve our schools and pupils.   If you missed the first two parts, you can see them here

Part 1: Putting safeguarding at the heart of your operating model.

Part 2: Managing safeguarding risk.

The third part deals with how to raise the quality bar in safeguarding, both within our organisation and across the sector as a whole.

Introduction

Safeguarding is fundamental for all organisations working with children, including all of us working to improve outcomes especially for disadvantaged pupils as part of the National Tutoring Programme. Effective safeguarding must therefore be a priority for all of us, requiring consistent and ongoing focus. The NTP's Quality Assurance (QA) Framework Criteria sets out key requirements for safeguarding and safer recruitment in **Element 2** and establishes the relevant criteria. Further guidance is provided in the QA Guidance Handbook. An effective TP should have a clear understanding of the required criteria and must be able to provide evidence of the outlined criteria embedded within the core of its organisation.

Our recent Quality Assurance Reviews focused on safeguarding and identified many areas of good practice, including a strong commitment by TPs to the highest standards of safeguarding. Through these reviews, we have also noted some common areas which could be strengthened. We are therefore embarking on a three-

Part 1: Putting Safeguarding at the Heart of Your Organisation

We discuss the safeguarding policies & tools, processes & procedures, and culture & values that need to be at the heart of your operating model.

Part 2: Managing Safeguarding Risk

We explore how TPs can proactively and effectively manage safeguarding risk.

Part 3: Raising the Quality Bar for Safeguarding in our Organisations and Across the System

We consider how TPs can build the quality of their safeguarding approach through a culture of continuous improvement.

part series on safeguarding which will be circulated via our newsletter in the coming weeks, which aims to help you strengthen safeguarding within your organisation:

Part 3: Raising the Quality Bar for Safeguarding in our Organisations and Across the Sector

This is the third in a three-part series focused on safeguarding. The first outlined a framework for putting safeguarding at the heart of a tuition partner's (TPs) operating model. The second focused on risk management, and how TPs can adopt a proactive approach. This final post in the series looks at raising the quality of TPs safeguarding approach, through building a culture of continuous improvement.

Building a culture of continuous improvement for safeguarding

Although continuous improvement needs to be embedded in policies and procedures, in this article we will look particularly at the role of culture & values in continuous improvement.
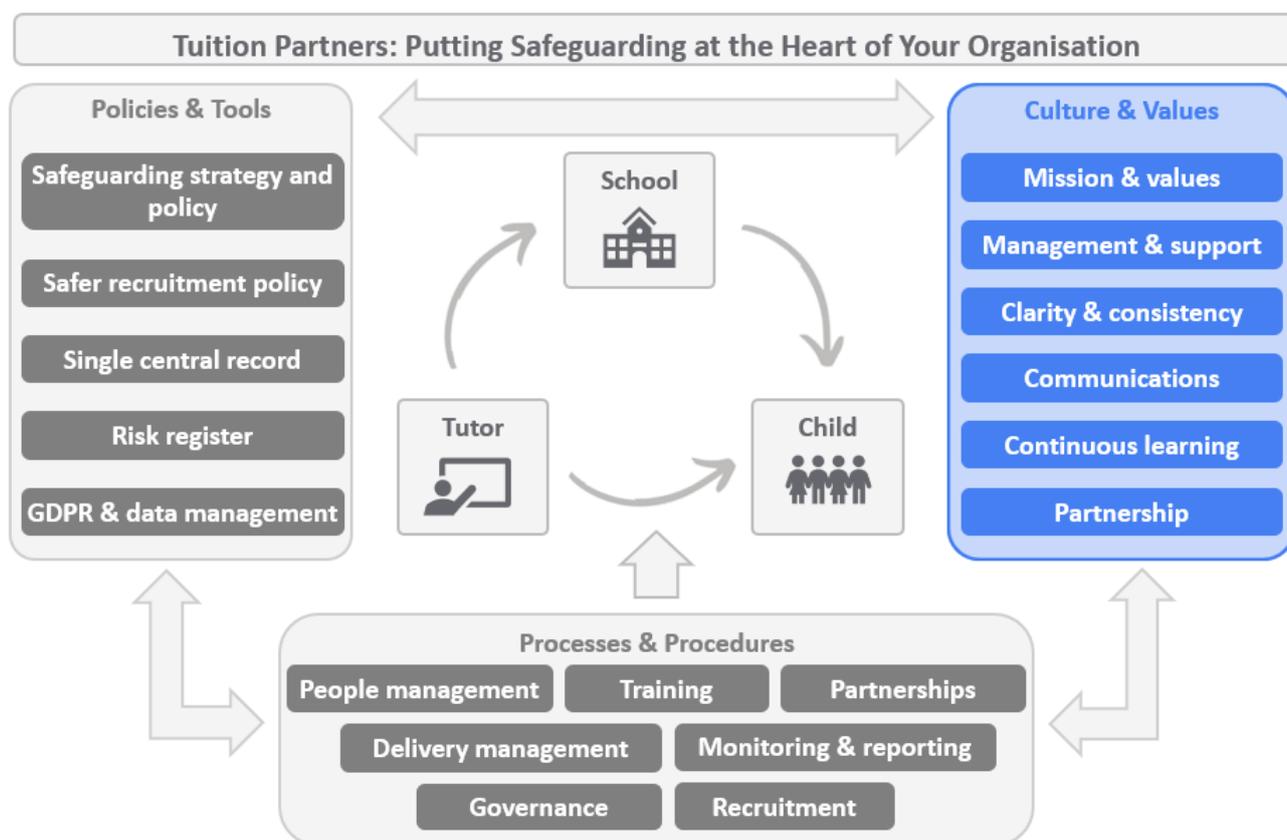
Policies and procedures have an important role to play in risk management, which was covered in the previous article. Culture & values, however, can be more challenging to define but often play a pivotal role in safeguarding. As outlined in Keeping Children Safe in Education (KCSiE), safeguarding is "**everyone's** responsibility". An organisation's culture & values can ensure that everyone recognises and accepts this responsibility. Culture & values are made up of various components. Outlined below is practical guidance for each of the components in the above diagram.

Mission & values – putting the child's learning, experience, and safety at the heart of an organisation's operating model requires a commitment from the top, ideally articulated in the mission and values of the organisation.

Management & support – staff need to be able to seek the guidance they need from skilled professionals around them. Effective safeguarding relies on a supportive and open senior management team that staff can go to with concerns and ideas for improvement.

Clarity & consistency – policies and processes should be consistent with each other and with relevant guidance. They should be clearly articulated, so that they can be easily adopted. They also need to be consistently adhered to.

Communications – this component is two-fold; firstly, TPs should ensure that all team members are knowledgeable on safeguarding and aware of their role's responsibilities. Staff must be aware of how to follow up on concerns, and when safeguarding policies change. Secondly, TPs should provide opportunities for staff to easily raise safeguarding concerns and issues; this could happen through regular training, dedicated channels, line management meetings, and other operational support mechanisms.

Continuous learning – a commitment to ongoing learning at the individual and organisational level could be brought to life through regular training (formal and informal), learning moments, and purposeful conversations. See below for more thoughts on the *learning organisation*.

Partnership – dialogue with schools to build trust, establish a common language, and to ask for feedback on a TP's safeguarding approach can be beneficial. TPs also need to be cognisant of the challenges that schools and teachers face. They must consider how to communicate with school staff in the most efficient and effective way possible, recognising that each school has its own safeguarding policies and procedures.

Further food for thought – 'the learning organisation'

David A. Garvin's [seminal 1993 paper](#) in Harvard Business Review identified five features of a learning organisation which remain relevant:

1. Systematic problem solving – using data rather than assumptions for decision-making. Organisations should follow a clear process to identify and ultimately solve problems (see diagram on the right). For organisations committed to continuous learning, this process is cyclical.

2. Experimentation – similar to systematic problem solving, experimentation is focused on opportunities and expanding horizons rather than addressing difficulties.

3. Learning from past experience – reviewing successes and failures, assessing them systematically, and sharing lessons openly and accessibly (where appropriate). In relation to safeguarding, learning from our own past experiences, as well as experiences of others or case studies, can be extremely effective. However, it is important that the pupils and adults involved in the situation remain anonymous.

4. Learning from others – both inside and outside the immediate environment or organisation, which means being receptive to criticism and consulting with customers (schools) and users (pupils) to create opportunities for receiving feedback and further improvement.

5. Transferring knowledge – knowledge needs to be spread quickly and efficiently through the organisation and potentially beyond. This could relate to safeguarding policy changes at a national or organisational level, or an organisation being restructured affecting safeguarding processes, and much more. It is integral that there is consistency and clarity in the messaging internally and externally (i.e., partner schools).

We have provided a few examples of how these five features may be relevant for safeguarding for a TP, however, TPs may want to reflect on how these features relate to their own unique organisations.
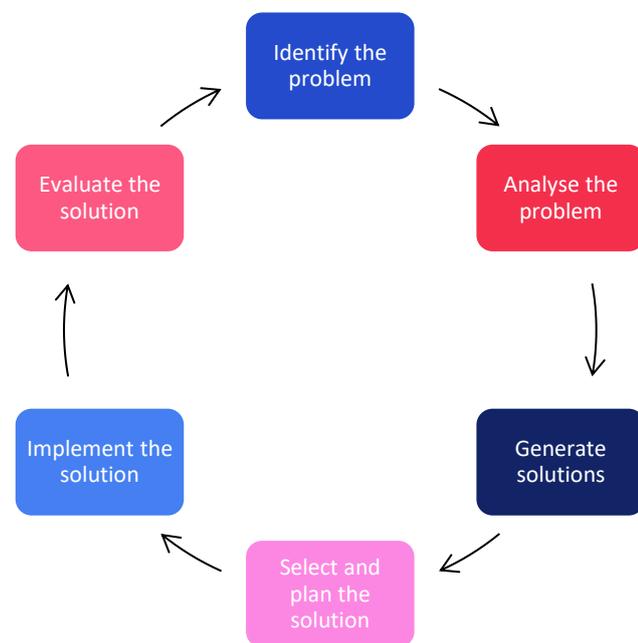
Conclusion

The National Tutoring Programme has the potential to positively impact the lives of thousands of disadvantaged children, both during and beyond the programme, if we can continue to build the case for tutoring. We all have a role in making tutoring the best it can be, and this requires a commitment to continuous learning and improvement, which encompasses all aspects of the quality framework, but with safeguarding at the heart.

References and Further Reading

- National Tutoring Programme Framework Criteria for Tuition Partners – This document from Tribal breaks down the three elements (Organisation, Safeguarding and Safer Recruitment, and Quality of Provision) into different criteria.
- National Tutoring Programme Quality Assurance Guidance Handbook – This document from Tribal provides the key information required for your organisation to meet the quality assurance requirements for the academic year 22-23.
- Keeping Children Safe in Education 2022 – This is statutory guidance from the Department of Education that all people working with children should be familiar with.
- David A. Garvin – Building a Learning Organization – This article by Garvin outlines how to build a learning organization.
- EEF – Effective Tutoring Toolkits for School Leaders – This resource provides guidance, based on case studies and research, on how to implement effective tutoring. While the document was developed with school leaders in mind, it also has valuable insights for TPs.

For additional safeguarding references, see Appendix 1.

Appendix 1: Links to useful documents

Newsletters from Tribal, possibly interweave content (e.g., video webinars on different safeguarding topics like recruitment) from them into blogs:

Tribal Key Documents

Framework Criteria for Tuition Partners

Framework Template for Tuition Partners

Quality Assurance Guidance Handbook

Key Government Policy Documents

National Tutoring Programme: Guidance for Schools, 2022-2023 (Safeguarding)

Keeping Children Safe in Education (2022)

The Prevent Duty: for Schools and Childcare Providers

Working Together to Safeguard Children (2018)

What to do if you are worried that a child is being abused (2015)

Tribal Newsletters

3rd of October 2022

31st of October 2022

14th of November 2022

28th of November 2022

Tribal Webinars

Introductory Webinars: Questions and Answers

Introductory Webinar (September 2022)

Safer Recruitment Webinar

Safeguarding Webinar

Tribal Safer Recruitment and Safeguarding Templates and Information

Safer Recruitment Excel Template

Template Letter of Assurance

Safer Recruitment PDF

Other Resources

EEF – Effective Tutoring Toolkits for School Leaders

NSPCC – Safeguarding and Child Protection

NSPCC - A Summary of Changes Introduced by Keeping Children Safe in Education 2022

Safeguarding Company - KCSIE 2022: Changes and updates to the guidance

High Speed Training Podcast – Updates for Keeping Children Safe in Education, 2022

Appendix 2: Deep dive on the single central record (SCR)

The single central record is a living document which is a key component of effective safeguarding and safer recruitment policy. The following information comes from the [Quality Assurance Guidance Handbook](#) and relates to multiple criteria and elements.

Tribal Record Keeping Requirements

People Management – *The organisation recruits and manages their workforce in line with the needs of the NTP. This standard criterion explicitly covers paid and unpaid employed staff, contractors and volunteers:*

- The TP has in place an up-to-date Single Central Record (SCR) of safer recruitment checks, which confirms that their tutors are suitable to work with pupils. (Criterion 1.3, p. 6)

Recruitment – *The organisation ensures that safer recruitment is central to their practice:*

- TPs must maintain a comprehensive single central record of all safer recruitment checks as specified, and provide this on request to Tribal and or the DfE.
- All staff paid or unpaid, supervised or unsupervised are to be subject to the pre-employment vetting checks set out in paragraph 232 of KCSIE 2022, including:
  - Verification of candidate's identity;
  - An enhanced UK DBS check including children's barred list information;
  - Verification of the candidate's mental and physical fitness to carry out their work responsibilities; and,
  - Verification of the person's right to work in the UK, including EU nationals.
- If the member of personnel has lived or worked outside the UK for any period of time, where available, they will be required to provide:
  - Criminal records check from that country (or countries);
  - A letter from the professional regulating authority of that country; and,
- - Their full employment history and reference checks. (Criterion 2.3, p. 14-15)

Monitoring and Reporting – *The organisation is robust about reviewing the risks and needs associated with safeguarding:*

- There are accurate and timely monitoring reports which reflect a proactive approach to monitoring and safeguarding the welfare of pupils, which are consistent with the school/colleges safeguarding and child protection policies and KCSIE. (Criterion 2.5, p. 15)

Compliance – *provision ensures that all Tuition Partners are compliant with the safeguarding regulations:*

- Data relating to safeguarding and safer recruitment checks are properly managed and stored, as appropriate.
- The data is readily available to the DfE and Tribal for quality assurance purposes, which may include regular audits, sampling, or any other applicable review of their safeguarding arrangements.
- Tuition Partners are able to provide a full list by way of a single central record of all active tutors working with them at any given time, including information set out in part 3 of KCSIE. (Criterion 2.9, p. 16)

Tribal Resources – Record Keeping, Safeguarding, and Safer Recruitment

In previous newsletters, Tribal has provided the following documents to support providers with their record-keeping:

This [template](#) is an example of what the Single Central Record looks like. It can be used to ensure that safer recruitment practices take place; it shows the kind of information that needs to be recorded for *all* personnel.

This [document](#) provides an email template which assures senior leadership teams in schools that the appropriate safeguarding checks have been completed on all relevant personnel. This document can also be used when completing safer recruitment checks using personnel from other agencies, for example conducting safer recruitment checks on supply teachers issued from agencies where the agency should have already completed relevant checks.

These are the [slides](#) from the previous Safer Recruitment webinar from The Safeguarding Alliance.

Appendix 3: Key takeaways from Tribal's Safer Recruitment Webinar

In November 2022, Tribal hosted a specialist webinar on Safer Recruitment (delivered by Emily Konstantas, founder and CEO of The Safeguarding Alliance). The recording of the webinar is available here to review. A few key takeaways from the session:

- Safer recruitment is not a tick box exercise, it's an ongoing, proactive journey (see diagram below from the Safer Recruitment webinar). It takes careful planning, clear organisational skills, confident communication and extreme due-diligence.
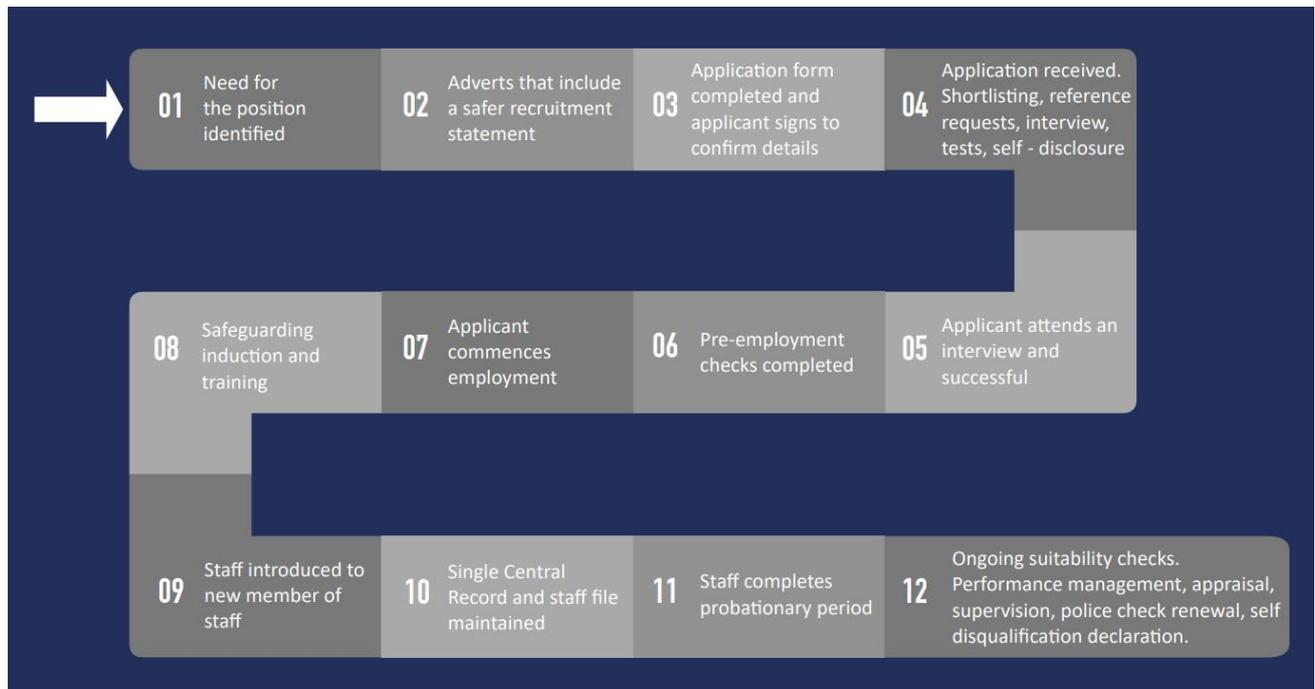
- Safeguarding is the biggest risk to any organisation from a reputational perspective and an organisational perspective. Ultimately your actions will be the difference between a child coming to harm or not so it's important to have a robust process.

- Your safer recruitment policy should be a living document and should not only be relevant to practice but also fit for purpose.

- You should maintain an updated single central record to showcase that you understand and adhere to your obligations around safer recruitment. This should be cross referenced with staff files to check for discrepancies too.

MANAGING ALLEGATIONS 7 KEY STEPS

1. Identify roles and responsibilities;

2. Operate a clear and precise allegations log;

3. Upholding confidentiality during the investigation;

4. Not allowing resignation and settlement agreements to prevent further actions being taken;

5. Reporting the allegations to the appropriate authorities;

6. Identifying lessons learned;

7. Managing media and post incident communications.

- It is important to have a managing allegations procedure in place and to reflect on any lessons learnt: what could we have done differently to mitigate this in the future, what could we have acted on quicker, what works, what didn't work, how to manage post-communication etc.

- You also have a duty to follow post-safer recruitment process for when individuals leave the organisation, for example
  1. Check and review social media and online accounts
  2. Conduct exit reviews and agreements [for employed staff]
  3. Ensure the name of the school is not being used (protect ourselves as an organisation)
  4. Return of property including intellectual property (logging tutors off the system)

- A safer recruitment policy (process of recruitment) is not the same as a safeguarding policy. Emily recommended that there should be two different policies as safer recruitment is too big to fit within the safeguarding policy itself.