

# Thought Leadership series

## Safeguarding Focus

January 2023

We are pleased to be sharing the second part of our three-part 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 part, you can see it here [Part 1: Putting safeguarding at the heart of your operating model.](#)

The second part deals with how to manage safeguarding risk. Over the next few weeks, we will share our final part in this series, part 3 which will look at raising the quality bar for safeguarding in our organisations and across the system.

### 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 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 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.

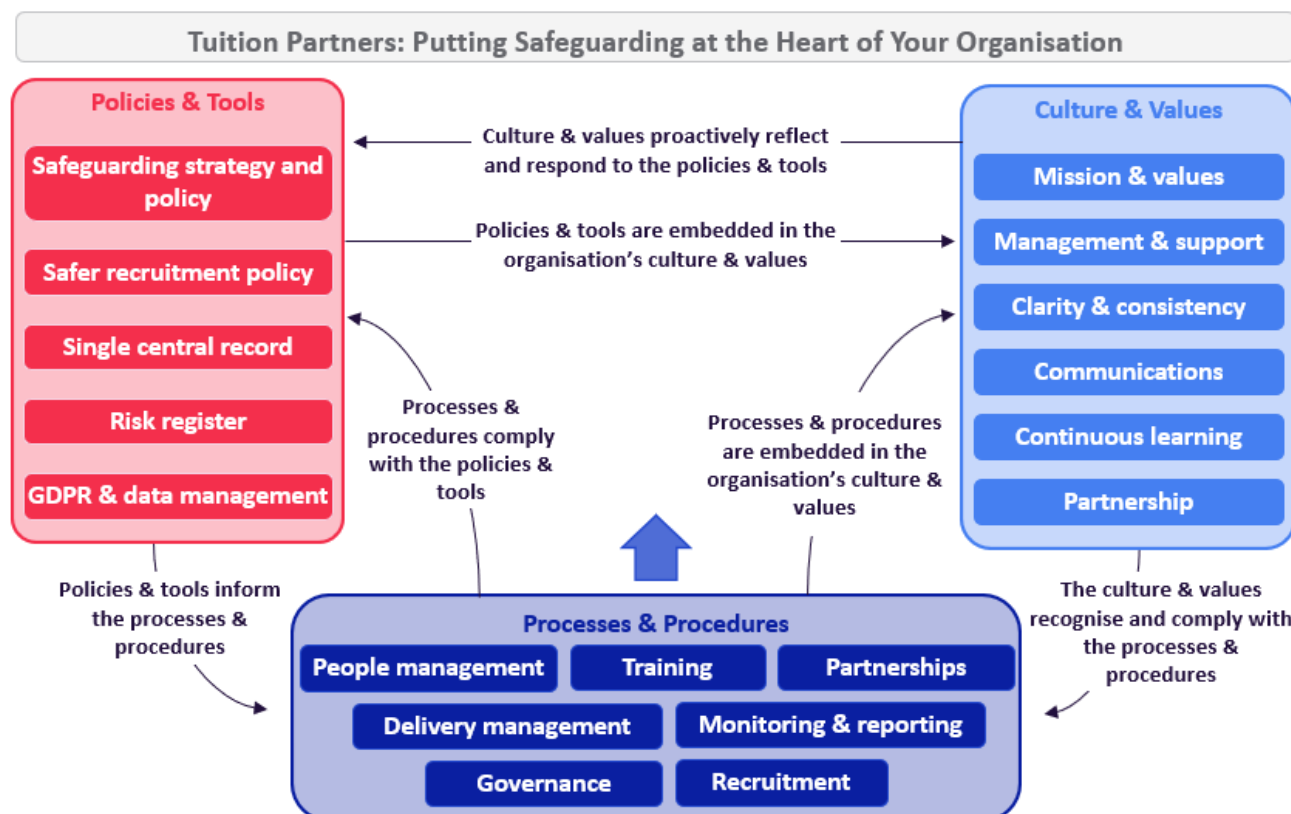


#### Part 3: Raising the Quality Bar for Safeguarding in our Organisations and Across the System

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

## Part 2: Managing Safeguarding Risk

This is part 2 of a three-part series focused on safeguarding. In part 1, we introduced a diagram for putting safeguarding at the heart of your operating model. The diagram below illustrates how Tuition Partners can put safeguarding at the heart of their organisation, and encompasses policies & tools, processes & procedures, and culture & values. We highlighted that these three broad categories, and all the components within them, need to operate in a connected and comprehensive way to keep children safe.




While having the right policies, tools, processes and procedures play a pivotal role in keeping children safe, it is important to recognise that no procedure or policy is fail-safe given the complex and multifaceted nature of disclosure and management of safeguarding concerns. The stakes are high if things go wrong; failure to effectively follow and implement safeguarding procedures is not only detrimental to a pupil's wellbeing and safety but could also severely undermine the reputation of the TP and the legacy of the National Tutoring Programme as a whole.

Effective safeguarding needs proactive risk management. In Part 2 of our safeguarding series, we are focusing on how effective, proactive risk management is an essential part of an organisation's approach to safeguarding.

## Establishing the risk management basics – the single central record

Effective risk management for safeguarding considers all three broad categories in a TP's operating model – policies & tools, processes & procedures, and culture & values – in anticipating and mitigating risk, and reducing the negative repercussions for the child, TP, and the whole sector. An important underpinning mechanism for **all** TPs is the single central record:


### Single Central Record



#### Tutor and Staff

TPs must confirm that all personnel, including tutors working on behalf of the organisation must:


- Have had their identity checked, in accordance with government guidelines;
- Hold a **valid DBS certificate** suitable for their position and level of contact with pupils, including a children's barred list check;
- Are **not** subject to a **teaching prohibition order** - hold valid professional qualifications, suitable to their role;
- Are **allowed to work** in the UK (if paid);
- Have **sufficient references** and provide **sufficient work history** to identify any gaps;
- Have **fitness** to work checks;
- Have any relevant **oversees checks**; and,
- Engage in the **DBS update service** (if applicable).



#### Training

TPs must confirm that all personnel, including tutors working on behalf of the organisation, must:

- Have read at least 'Part one' of the most recent [KCSIE](#) as well as the [Prevent Duty](#) and received training and guidance regarding these; and,
- Have received safeguarding and child protection training as part of their induction (including online safety), including annual refresher training (where applicable).



#### Data

TPs must confirm that:

- The data relating to safeguarding and safer recruitment is properly managed and securely stored (in accordance with GDPR regulations and guidelines); and,
- A single central record (SCR) is in place, kept up to date and that all staff as part of the Tuition Provider are deemed suitable to work with pupils.

*See Appendix 2 for more details on the single central record.*

Source: Adapted from the [QA Guidance Handbook](#) (p. 17-18).

## Practical tips for proactive risk management

Here are some practical tips for proactive rather than reactive risk management. It is important to note that these relate to various criteria in **Element 2: Safeguarding and Safer Recruitment** outlined in the [QA Guidance Handbook](#), [QA Framework](#), and [QA Framework Criteria](#).

- It is important to **proactively update policies**, not just when they expire. As previously mentioned, the KCSiE guidance has been recently updated. It is important to integrate anticipated changes into the organisation's strategic plan and ensure these changes are coherent and consistent with other key components (i.e., training is also updated). *See criterion 2.1 Policies and Procedures.*
- Safeguarding risk management must be embedded into **conversations at every level of the organisation**, e.g., risk management training, team meetings, operational reviews, senior leadership team meetings. *See criterion 2.2 Values, Culture, and Awareness.*
- TPs must take an **investigative approach to safer recruitment**. In November 2022, Tribal hosted The Safeguarding Alliance to deliver a webinar on [Safer Recruitment](#), which provided guidance and information on how to ensure safer recruitment practices. As mentioned in the webinar, safer

recruitment is not a tick box exercise, it is an ongoing journey where we need to be proactive. Appendix 3 includes a summary of a few key takeaways from the Webinar. *See criterion 2.3 Recruitment.*

- Regular reviews of the **risk register** (at appropriate levels of the organisation) help to ensure that it is up-to-date, and that risk is pre-emptively identified, mitigated, and resolved. Also, there should be a regular refresh of staff safeguarding checks throughout employment. *See criterion 2.5 Monitoring and Reporting.*
- **Monitoring and reporting** must be firmly embedded in operational processes at all appropriate levels; they must be routine and meaningful, and data must be reviewed to assess future risks and changes. *See criterion 2.5 Monitoring and Reporting.*
- TPs must provide **easily accessible and effective support to employees** so that they can ask questions and seek help on safeguarding issues. This includes having clear organisational structures and lines of accountability, including for escalating concerns. *See criterion 2.6 Training, Support, and Guidance.*
- It is important to establish a **strong relationship, and clear communication protocols, with schools** for reporting safeguarding concerns so that when a concern is flagged, TPs are already aware of the school's processes & procedures. Managing safeguarding across multiple organisations and individuals (i.e., schools, teachers, TPs, tutors, pupils, and at home) with multiple policies or approaches is very complex, so investing in this area ahead of time is particularly valuable. *See criterion 2.8 Partnership.*
- Another crucial factor is recognising the importance of **strong tutor-pupil relationships** which not only play an important role in academic outcomes but can also help children feel safe enough to disclose information to someone they trust.

## Conclusion

When it comes to mitigating risk in safeguarding, being proactive is key. This needs to run through everything we do – our policies & tools, processes & procedures, and culture & values. Simply being reactive can lead to gaps in compliance, leave children vulnerable, and expose our organisations, and the National Tutoring Programme, to reputational damage.

Being proactive in safeguarding, as well as mitigating risks in other areas, requires a culture of continuous learning. It is important we should strive to refine, improve, and increase our impact. Reflecting on existing processes to update and improve procedures is important in this journey of continuous learning. In our next article (Part 3), we will be looking at how organisations can improve beyond compliance and shift mindsets to be more agile in the continuously changing environment.

## 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.
- [The Prevent Duty: for Schools and Childcare Providers](#) – This document provides non-statutory advice on protecting children from the risk of radicalisation.
- [National Tutoring Programme Quality Assurance Framework](#) – This document from Tribal provides a framework which describes 4 levels of proficiency for each criterion, starting from not met and then moving through levels 1-3.
- [National Tutoring Programme Safer Recruitment Webinar](#) – This is a recording of the safer recruiting webinar hosted by Tribal in November 2022 and delivered by Emily Konstantas, founder and CEO of The Safeguarding Alliance.
- [Safer Recruitment Webinar slides](#) – These are the slides used by Emily in the above safer recruitment webinar.
- [Appendix 3 summarises a few key takeaways from the Safer Recruitment webinar.](#)

For additional safeguarding references, see Appendix 1.

## **Appendix 1: Links to useful documents**

### 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

[3<sup>rd</sup> of October 2022](#)

[31<sup>st</sup> of October 2022](#)

[14<sup>th</sup> of November 2022](#)

[28<sup>th</sup> 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 at 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 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.

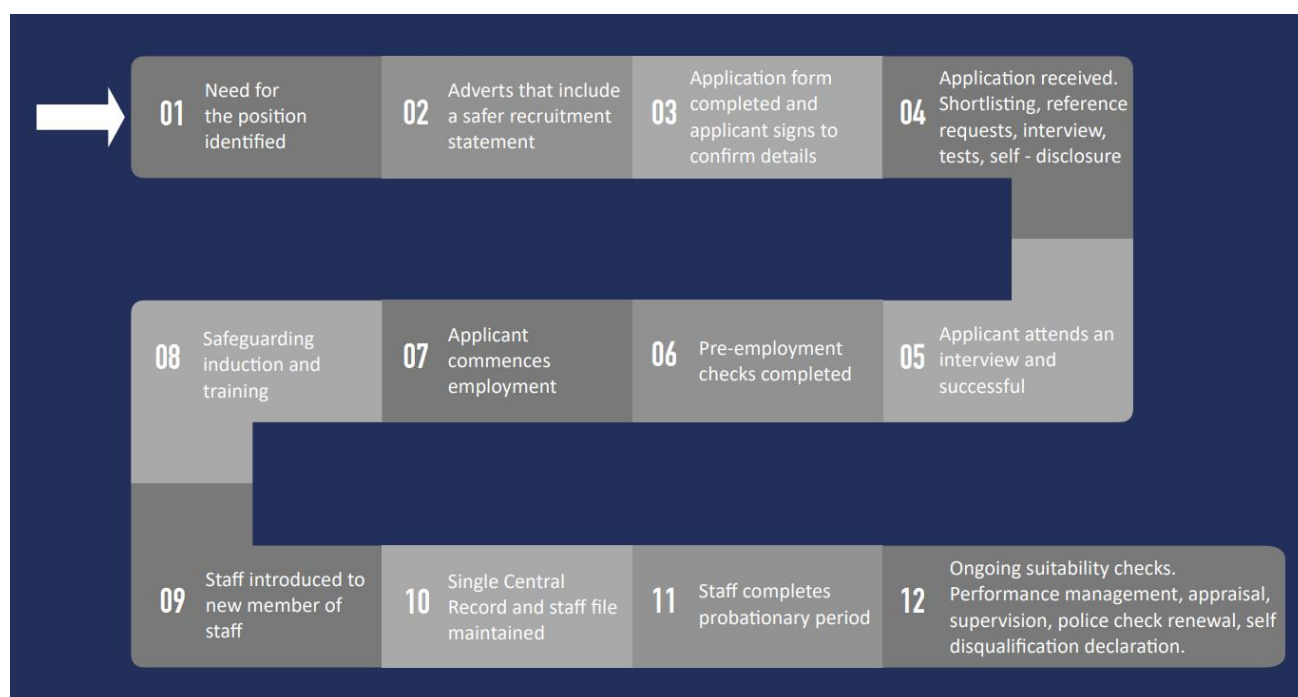
These are the [slides](#) from the previous Safer Recruitment webinar from The Safeguarding Alliance.



### 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 (protection 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.