

# FFT Safeguarding policy

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**FFT Designated Safeguarding Lead: Helen Robinson**  
**(Operations Director) (07715 033486)**

**FFT Deputy Designated Safeguarding Lead:** Victoria Siberry (HR Officer)

**FFT Deputy Designated Safeguarding Lead:** Robyn Shepherd (HR Officer)

**FFT Deputy Designated Safeguarding Lead:** Sarah Williams (Information Security Manager)

Email [safeguarding@fft.org.uk](mailto:safeguarding@fft.org.uk) to report a safeguarding concern or incident to the FFT Designated Safeguarding Lead

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## 1 Introduction and scope

FFT is committed to safeguarding and promoting the welfare of children and young people, and expects all staff working for FFT to share this commitment. We have a responsibility to promote the welfare of children and young people and to keep them safe.

Children and young people (hereafter referred to as 'children') for the purposes of this policy refer to individuals under the age of 18.

FFT's safeguarding policy applies to all employees at all levels of the business, as well as any contractors and agency workers.

The purpose of this policy is to protect children and anybody using or engaging with FFT's education services regardless of age, gender, religion or beliefs, ethnicity, disability, sexual orientation or socio-economic background from harm and to provide all employees and workers with information about the safeguarding policy adopted by FFT.

This is particularly important (and must be followed) for any FFT employees or workers who work with children, or any FFT employees or workers delivering education services to schools which involve FFT working directly with children.

This policy covers the arrangements for safeguarding during the recruitment and selection process and safeguarding issues that arise during employment in circumstances where children or those using FFT's education services are placed at risk, or where they could have been placed at risk, including disclosures made by a child.

This policy also sets out the reporting obligations for all employees and the procedure that should be followed to report abuse if this occurs to anyone using FFT's education services.

FFT will ensure that good governance and quality standards are maintained within the organisation and establish clear policies and procedures based on legislation and guidance. We will apply robust risk management processes for the identification of situations which may require the organisation to make professional judgements to protect students from harm.

Confidentiality is essential to the environment of trust with children who use our services but this will be balanced against the organisation's duty to protect children.

## 2 Legal Framework

This policy has been drawn up on the basis of legislation, guidance and best practice that seeks to protect children in England. FFT will specifically follow the procedures and guidance outlined within the key legislation including The Children Act 1989 & 2004 together with the statutory guidance [Working Together to Safeguard Children 2018](#) and Keeping Children Safe in Education 2023 [KCSIE](#)

The wider legislative framework includes:

- Human Rights Act 1998
- United Nations Convention on the Rights of the Child, 1991
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003
- Children Act 2004
- Safeguarding vulnerable Groups Act 2006
- The Forced Marriage (Civil Protection) Act 2007
- The Equality Act 2010

- Children and Families Act 2014
- Anti-Social Behaviour, Crime and Policing Act 2014
- Modern Slavery Act 2015
- Counter Terrorism and Security Act 2015
- Children and Social Work Act 2017
- Data Protection Act 2018
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021

### 3 Safeguarding

FFT recognises that all of our employees, contractors and agency workers have a part to play in safeguarding children. We aim to take an approach that considers at all times the best interests of the child. As stated within statutory guidance, (Working Together to Safeguard Children 2018 and Keeping Children Safe in Education 2023), safeguarding and promoting the welfare of children is defined as:

- protecting children from maltreatment;
- preventing 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; and
- taking action to enable all children to have the best outcomes.

### 4 Roles and Responsibilities

All adults working with or on behalf of children have a responsibility to protect them and to provide a safe environment in which they can learn and achieve their full potential. However, there are key people within FFT who have specific responsibilities under child protection procedures. The names of those in our organisation with these specific responsibilities (the designated safeguarding lead and deputy designated safeguarding lead) are shown on the cover sheet of this document.

#### **The Senior Management Team**

The senior management team ensures that the policies, procedures and training in our organisation are effective and comply with the law at all times. It ensures that all required policies relating to safeguarding are in place, that the safeguarding policy reflects statutory and local guidance and is reviewed at least annually.

The Managing Director (MD) is named on the front cover of this document. The MD takes leadership responsibility for safeguarding arrangements at FFT. The senior management team ensures there is a named designated safeguarding lead and at least one deputy safeguarding lead in place (also named on the front cover).

The senior management team ensures that FFT contributes to inter-agency working, in line with statutory and local guidance. It ensures that information is shared and stored appropriately and in accordance with statutory requirements.

The senior management team ensures that all staff members undergo safeguarding and child protection training at induction and that it is then regularly updated. All staff members receive regular

safeguarding and child protection updates, at least annually, to provide them with the relevant skills and knowledge to keep children safe.

The senior management team are responsible for ensuring that FFT follows recruitment procedures that help to deter, reject or identify people who might abuse children. It adheres to statutory responsibilities to check adults working with children and has recruitment and selection procedures in place (see FFT's 'Safer Recruitment' policy for further information).

### **The Designated Safeguarding Lead (and Deputy / Deputies)**

The designated safeguarding lead at FFT has ultimate lead responsibility for safeguarding and child protection. The named DSL and Deputy DSL(s) will be provided with the appropriate level of training to enable them to fulfil their responsibilities in supporting and guiding staff and tutors on safeguarding matters. The training should be updated every two years. They are responsible for responding to initial concerns or disclosures.

The Named Designated Safeguarding Lead and Deputy DSL(s) will:

- Provide ready and accessible support and guidance to all staff, tutors and directors on safeguarding matters
- Manage all safeguarding reports and act as liaison for statutory services during any criminal or safeguarding investigation
- Ensure that serious incidents relating to safeguarding are reported immediately and managed effectively
- Report allegations against directors, staff, or tutors to the relevant Local Authority and Disclosure and Barring Service as appropriate
- Ensure accurate records of all safeguarding concerns and the secure storage of all safeguarding records
- Provide a quality assurance and review function for all safeguarding concerns
- Work with all the above governance bodies to inform of serious or untoward safeguarding incidents as appropriate
- Ensure the adoption, implementation and auditing of all policies and strategies in relation to safeguarding
- Liaise with school Designated Safeguarding Leads on matters of safety and safeguarding, in particular online and digital safety involving FFT tutors, when deciding whether to make a referral to the relevant agencies. For clarity online safety includes understanding the school approach to filtering and monitoring as applicable.

They will ensure that everyone at FFT (including temporary staff, volunteers and contractors) is aware of these procedures and that they are followed at all times.

### **All FFT Tutors**

Every FFT Tutor has a responsibility to provide a safe learning environment in which children can learn. Any child may benefit from early help and all FFT tutors are aware of FFT's process, along with the school processes (relative to their tutoring placement) and their role in it. They are aware of signs of abuse and neglect so they are able to identify children who may be in need of help or protection.

All FFT Tutors are aware of and follow FFT processes. An FFT Tutor may be placed in one or more schools and is responsible for ensuring they are aware of school processes (as set out in the school child protection and safeguarding policy) and are aware of how to make a referral to Social Care if there is a need to do so. FFT Tutors must also ensure they are aware of the school approach to online safety and their responsibilities in relation to filtering and monitoring.

If an FFT Tutor has any concerns about a child's welfare, they must act on them immediately and speak with the designated safeguarding lead (or deputy) at the school where they are working. They should not assume that others have taken action.

#### **All FFT staff (not based in schools)**

Everyone at FFT has a responsibility to help provide a safe learning environment in which children can learn.

All non-school based FFT staff are aware of signs of abuse and neglect, and are aware of and follow processes as set out in the FFT Safeguarding policy.

If staff have any concerns about a child's welfare, they must act on them immediately and speak with the designated safeguarding lead (or deputy) – they should not assume that others have taken action.

## **5 Recruitment process**

FFT will strictly adhere to the recruitment, selection and vetting checks that must be made on all employees or workers who work with children. These requirements are incorporated into our recruitment procedures and are fully compliant with government guidelines as set out in the current government guidance, Keeping Children Safe in Education, Working Together to Safeguard Children and Disqualification under the Childcare Act. FFT will ensure that any partners or subcontractors who recruit workers on behalf of FFT who work with children, shall follow these recruitment, selection and vetting checks.

FFT and our partners will also adhere to the specific duties and responsibilities for an employer in relation to barred persons and the sharing of information about individuals to the relevant bodies (i.e., Local Authority Designated Officer (LADO), Disclosure & Barring Service (DBS) and the Teaching Regulation Agency (TRA)).

The following checks shall be completed prior to an employee or worker starting any work with children, and repeated during service:

- Face to face interview with the applicant (in exceptional cases where this is not possible, video calling software interviews will be conducted)
- Confirm the true identity of the applicant in line with current guidelines, this must include photographic ID/date of birth check/change of name check
- Confirm the applicants address with two independent documents
- Right to work in the UK
- Qualifications verified against the issuing relevant institution or governing body
- Confirm QTS (if applicable) and check for any active restrictions using Employer Access
- Prohibition and sanction checks on all staff
- Confirm that overseas trained teachers hold UK NARIC equivalent to a British Teaching Degree or PGCE
- Obtain an enhanced DBS certificate and/or verify a valid DBS certificate online using the Update Service and perform a status check on that document
- Carry out relevant checks for applicants who have lived/worked overseas including obtaining specific documentation i.e., Police Check/Letter of Good Conduct
- Give applicants the opportunity (both verbally and in writing) to declare any convictions, cautions or reprimands, warnings or bind-over's in line with current [DBS filtering rules](#) (introduced May 2013)

- Barred List check
- Medical fitness to work
- Received and verified at least two satisfactory references covering a minimum of the last two years
- Verified gaps in work history
- Disqualification check

Schools have a legal duty under ‘safeguarding children and safer recruitment in education’ to ensure that any staff they engage or who are working with children in school, including agency staff or staff working for FFT, have been properly vetted. All of FFT’s vetting checks are OFSTED compliant.

FFT and our recruitment partners achieve and maintain the highest standards in recruitment practice which are vital for safeguarding children and staff in schools. Our specialist recruitment partner for employees or workers working with children (Operam Education Group) has achieved REC Audited Education accreditation.

## 6 Existing employees

Existing FFT employees may be required to provide satisfactory disclosure checks (as outlined above) where their work becomes a regulated activity/work (i.e., working with children) or FFT requires them to start carrying out regulated activity/work. Existing employees will not be able to carry out any regulated activity/work until they have undertaken a satisfactory disclosure check.

If employees are unable to provide a satisfactory disclosure check, or refuse to undertake a disclosure check, the FFT will consider the options for redeployment into any available job roles that do not involve regulated activity/work.

If existing employees become added to the children and adults barred lists, FFT will consider the options for redeployment into any available job roles that do not involve regulated activity/work. All employees who are added to the barred lists are required to inform their line manager of their inclusion on the list at the earliest opportunity. A failure to do so may be deemed a disciplinary matter to be dealt with under the disciplinary procedure.

In both cases, if this is not possible, FFT may need to consider dismissal of the employee on the basis of the statutory ban imposed by the disclosure. FFT may be unable to continue to employ the employee in any capacity if the continued association with the employee cannot be maintained, causes reputational damage to the employer or other reasons that harm its position in the marketplace.

## 7 What is abuse?

Given the risk of abuse to children and those using FFT’s education services, all employees are required to be alert at all times to the possibility of abuse towards children or those using FFT’s education services. The definitions of abuse are found within ‘Keeping Children Safe in Education 2023’ The categories and four key types of abuse are stated as:

- Physical
- Emotional
- Sexual
- Neglect

The guidance Keeping Children Safe in Education 2023 states that “abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.”

Indicators of abuse and neglect are defined in Keeping Children Safe in Education 2023 as follows:

**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 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 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 (also known as child on child abuse) in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it, (for further information refer to paragraph 49, KCSIE)

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

All FFT employees or workers who work with children, or any FFT employees or workers delivering education services to schools which involve FFT working directly with children will be aware that abuse, neglect and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another, therefore employees should always be vigilant and always raise any concerns with the DSL in school and the DSL/DDSL at FFT.

All employees will have an awareness about specific forms of abuse and safeguarding issues that can put children at risk of harm ([KCSIE, Annex B](#)). Behaviours linked to issues such as drug taking and/or



alcohol misuse, deliberately missing education and [consensual and non-consensual sharing of nudes and semi-nude images and/or videos](#) can be signs that children are at risk. As per KCSIE other safeguarding issues that employees will be aware of include:

- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation (CCE)
- Children missing education
- Children being absent from education for prolonged periods and/or on repeat occasions
- Female Genital Mutilation (FGM)
- Forced Marriage
- Prevent
- Modern Slavery
- Domestic Abuse
- Homelessness
- Upskirting
- Mental Health
- Child on child Abuse
- Serious Violence

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their **mental health**, behaviour, and education. More information can be found in the [mental health and behaviour in schools guidance](#), colleges may also wish to follow this guidance as best practice. Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among children. See Rise Above for links to all materials and lesson plans.

All employees will be aware that children can abuse other children (often referred to as child on child **abuse**). And that it can happen both inside and outside of school or college and online. It is essential that all employees challenge inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Child on child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)

- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

All employees will be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

All employees will be aware of the range of risk factors which increase the likelihood of involvement in **serious violence**, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Further information is available in the following Home Office guidance documents [Preventing youth violence and gang involvement](#) and its [Criminal exploitation of children and vulnerable adults: county lines guidance](#)

All employees will be aware that children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. This can mean additional barriers may exist when recognising abuse and neglect in this group of children. These barriers can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration.
- These children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children.
- The potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Communication barriers and difficulties in managing or reporting these challenges.
- Cognitive understanding – being able to understand the difference between fact and fiction in online content and then repeating the content/behaviours or the consequences of doing so.

## 8 Dealing with a safeguarding concern or disclosure made by a child

Disclosure is the process by which a child starts to share their experiences of abuse with others. In the event of a member of staff having a potential safeguarding concern about a pupil, or a pupil makes a potential safeguarding disclosure to a member of staff, then that concern or disclosure must be passed on to the DSL immediately without delay. If a disclosure is made to an FFT agency worker who is working within a school then the school's DSL must also be contacted.

The following steps below will be taken if a child makes a disclosure of abuse or you have a concern about a child's safety or welfare:

### Recognise

- Listen carefully to what is being said, without displaying shock or disbelief.

- Accept what is said. The child making the disclosure may be known to you as someone who does not always tell the truth. However, do not let your past knowledge of this person allow you to pre-judge or invalidate their allegation.
- Do not attempt to investigate the allegation. Your duty will be to listen to what is being said and to pass that information on.

### Respond

- Acknowledge that it takes extraordinary courage for a child to go through the journey of disclosing abuse and therefore take reasonable steps to re-assure the child that they have been brave in informing you. For example, you could say: “You’re not to blame. This is not your fault”.
- Allow the young person to speak without interruption, encouraging them to tell you only what they feel comfortable telling you, and be accepting and be non-judgemental about what is said.
- Do not ask leading questions of any kind, questions must be open.
- Do not promise the child that you will not inform anyone else and you will keep this confidential. You have a duty to pass this information to the DSL for the protection of the child

### Report

If an FFT worker has any safeguarding concerns in regards to a child or suspects abuse, but it has not been disclosed by the child, FFT workers shall not discuss their suspicions with the child in question or conduct any form of investigative work.

The following steps will be followed in reporting a safeguarding concern:

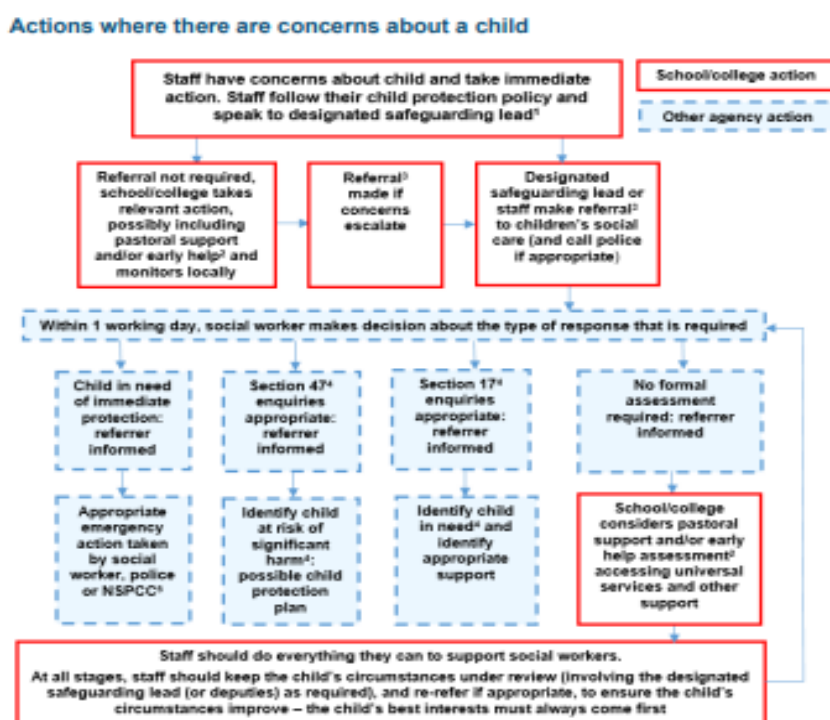
- Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children’s social care (and if appropriate the police) is made immediately, Fig. 1.
- As soon as possible report your concerns to the DSL/DDSL and email the report of a safeguarding concern form to [safeguarding@fft.org.uk](mailto:safeguarding@fft.org.uk)
- FFT agency workers who are working within a school will be advised of the school’s DSL and DDSL who should also be advised of your safeguarding concern.
- The school shall follow the school's procedure for contacting the relevant Children’s Social Care Team and/or local Police Child Protection Unit.
- FFT DSL will contact the relevant Children’s Social Care Team and/or local Police Child Protection Unit unless the concern pertains to a school with whom FFT are working then FFT will support the school with any action that the school deems appropriate and shall undertake reasonable endeavours to provide the school with any assistance or documents.
- A telephone referral to Children’s Social Care must be followed up in writing within 24 hours.
- Within one working day of a referral being made, a local authority social worker should acknowledge receipt to the referrer and make a decision about the next steps and the type of response that is required. This will include determining whether:
  - the child requires immediate protection and urgent action is required;
  - the child is in need, and should be assessed under section 17 of the Children Act 1989;
  - there is reasonable cause to suspect the child is suffering or likely to suffer
  - significant harm, and whether enquiries must be made and the child assessed under section 47 of the Children Act 1989;
  - any services are required by the child and family and what type of services;
  - further specialist assessments are required to help the local authority to decide what further action to take; and
  - to see the child as soon as possible if the decision is taken that the referral requires further assessment.
- FFT shall not, under any circumstances, undertake any independent investigation or questioning (as this may jeopardise any enquiry) unless or until FFT is given authorisation by the school or the Authorities. Following authorisation, FFT may independently follow up on the allegation.

- All allegations or suspicions shall be referred to the school no matter how insignificant they seem to be or when they occur. Any information about suspicious behaviour or circumstances will be passed to the local Police Child Protection Unit or the local Social Services within 24 hours or as soon as shall be reasonably practicable.

## Record

- Take notes as soon as it is practical to do so. Record the actual words spoken by the child – do not re-translate them into the way that adults speak or try to make sense of the structure of what was said
- Make a note of the pupil’s name, the time and date within your written record
- Update this information onto the official [FFT Safeguarding recording template](#)
- FFT shall retain a copy of all such notifications in accordance with GDPR guidelines.
- FFT will review all safeguarding records regularly as part of its ongoing monitoring to identify any patterns or trends which will shape and inform training, policy, procedures and practice.
- Report the facts as you know them/ or understand them, including the pupil’s name and the account given to you by the pupil using the words that they used as well as including any other information your feel is relevant.
- Complete the official [Logging concerns/information shared by others external to the school](#) (page 5 of the [FFT Safeguarding recording template](#))
- Provide this detailed information to the FFT Designated Safeguarding Lead as soon as you are able.
- FFT shall retain a copy of all such notifications in accordance with GDPR guidelines.

Figure 1. KCSIE, 2023, Actions where there are concerns about a child



## 9 Managing allegations against adults who work with children

### If you receive an allegation about an adult or FFT worker

FFT workers will:

- Immediately after receiving an allegation or disclosure, contact the FFT Designated Safeguarding Lead (or in the absence of the DSL the deputy should be contacted)
- Report the facts as you know them/ or understand them, including the names of relevant adults and/or children and the account given to you using the words that they used as well as including any other information your feel is relevant.
- Complete the official [FFT Safeguarding recording template](#)
- Provide this detailed information to the FFT Designated Safeguarding Lead as soon as you are able by emailing [safeguarding@fft.org.uk](mailto:safeguarding@fft.org.uk) or calling FFT on 01446 776 262 and requesting to speak with our DSL
- FFT shall retain a copy of all such notifications in accordance with GDPR guidelines.

## 10 Code of conduct

All FFT workers who come into contact with children through FFT’s work must comply with the Code of Conduct requirements here relating to child protection and safeguarding. FFT worker have a responsibility to safeguard pupils and also to protect themselves from allegations. FFT workers must:

- Be familiar with and act in accordance with the partner school’s policies and procedures regarding child protection and safeguarding
- Treat all children with respect
- Avoid being alone or unsighted with children at all times
- Be aware that any physical contact with pupils can be misinterpreted and be careful of the way language used can also be misinterpreted
- Never share personal contact details or communicate through social media or similar platforms;
- Be aware of the steps taken in the event of becoming aware of, suspecting or receiving allegations of abuse or disclosure (and who to contact as the designated safeguarding lead within the school)

## 11 Online and remote tutoring (National Tutoring Programme only)

The preferred delivery model for FFT’s tutoring programme is for the FFT Tutor (an employee or worker) to deliver in-person tutoring in the school with the pupils. In addition to the core in-person tutoring delivery model, there may be some circumstances where it is necessary or beneficial for the FFT Tutor to deliver online/remote tutoring, including:

Tutoring delivery model	FFT Tutor location	Pupil location
<b>In-person tutoring</b> <i>Preferred, core delivery model for FFT tutoring</i>	School	School
<b>Online tutoring: remote to school</b> <i>Preferred online tutoring delivery model</i>	FFT office or FFT Tutor working remotely at home	School
<b>Online tutoring: school to home</b> <i>Only to be used in limited circumstances</i>	School	Home

<b>Online tutoring: remote to home</b>  <i>Only to be used in limited circumstances</i>	FFT office or FFT Tutor working remotely at home	Home
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In addition to all of the safeguarding processes and requirements outlined in this policy, where any FFT employee or worker is engaged as an FFT Tutor delivering online or remote tutoring, the following additional safeguarding measures shall be implemented:

- All FFT Tutors shall receive additional safeguarding training in relation to online tutoring
- The school will consent before any online tutoring takes place with pupils based in the school, with clear tutoring expectations agreed in advance
- The school and parents will consent before any tutoring takes place with pupils based at home, with clear tutoring expectations agreed in advance
- The tutor and pupils will keep their video on for the duration of the online tutoring session
- If the pupil is based in school for online/remote tutoring, the FFT Tutor and school shall ensure that a school adult is present at all times in the same room and that the adult talks to the tutor at the start and end of each tutoring session
- If the pupil is based at home for online/remote tutoring, the FFT Tutor, school and parent shall ensure that an agreed adult is present at all times in the same room at home, and that the adult talks to the tutor at the start and end of each tutoring session
- The online tutoring sessions shall be recorded by FFT and stored for a period of 6 months by FFT, or longer if deemed necessary by FFT's Designated Safeguarding Lead
- The online/remote tutoring sessions shall only take place at the designated times agreed with schools, and also parents, if the tutoring is with pupils based at home
- FFT Tutors shall ensure that their location for online tutoring (at school, an FFT office or home-based working) is suitable and appropriate to maintain the privacy of any personal information and does not have inappropriate background content
- The FFT Tutor shall only share and use online the content and resources from the FFT Tutoring with the Lightning Squad platform for the tutoring, and not share or provide links to any other content or resources
- FFT reserve the right to independently monitor online tutoring sessions at any time, either live or afterwards, to monitor the effectiveness of our safeguarding processes
- The FFT Tutor shall only use an online conferencing platform, agreed in advance with FFT and the school, for online tutoring (for example Zoom, Teams, Google Hangout or Whereby)
- The school will agree with FFT the method and protocols for communicating and initiating the online tutoring session
- The FFT Tutor shall follow any additional requirements specified in the school's safeguarding policies in relation to online/remote teaching or tutoring

## 12 Maintaining records

FFT will ensure that all details associated with an allegation of abuse are recorded clearly and accurately. The records will be maintained securely in line with FFT's confidential record keeping procedure.

## 13 Disciplinary action

If the investigation reveals that abuse has happened, or is happening, FFT will set up a disciplinary hearing for the employee concerned. Abuse of children or young people or anyone using FFT's

education services is regarded by FFT as an act of gross misconduct and the allegation could result in summary dismissal, in line with the FFT disciplinary procedure.

Employees will have the chance to appeal any disciplinary action that is taken against them.

## 14 Duty of disclosure

FFT is legally required to send information to the Disclosure and Barring Service if a decision is taken to dismiss an employee or remove them from working in regulated activity/work.

FFT may also be required to inform the Disclosure and Barring Service if FFT suspends an employee, or an employee resigns in suspicious circumstances, as the referral duty criteria may already be met at that stage.

## 15 Additional support and guidance

Employees who wish for further information on safeguarding are encouraged to contact their line manager or FFT Safeguarding Lead (or Deputy). FFT will endeavour to provide up to date support and guidance to all staff when it comes to safeguarding and their duty to protect children or users of FFT's education services from harm.

The following documents should be used alongside this policy:

- [FFT Safer Recruitment](#)
- [FFT Safeguarding Recording Templates](#)
- [FFT Data Protection policy](#)
- [FFT Data handling policy](#)

## 16 Change History and Circulation

Version	Changed by	Date	Circulation	Comments
1.0	Paul Charman	16/09/2020	SMT, HR, NTP team	First version
1.1	Paul Charman	18/09/2020	SMT, HR, NTP team	Reviewed, approved and published
1.2	Helen Robinson	16/11/2020	SMT, HR, NTP team	Update in-line with feedback from EEF
1.3	Victoria Siberry	17/11/2020	SJH, HeIR & PC	Further updates in-line with feedback
1.4	Helen Robinson	20/11/2020	SJH, HeIR, PC & LJ	Updates to other documents and review following changes
2.0	Victoria Siberry	20/11/2020	SJH, HeIR, PC & LJ	Reviewed & published
2.1	Paul Charman	09/12/2020	SJH, HeIR, PC & LJ	New section on online/remote tutoring
2.2	The Athena Programme	10/09/2021	SJH, HeIR, PC, LJ, RS, SW	Reviewed & updated in line with new guidance
2.3	Helen Robinson	07/10/2021	SJH,VS, PC, LJ, RS, SW	Merged Safeguarding Roles and Responsibilities into policy from separate document

<b>Version</b>	<b>Changed by</b>	<b>Date</b>	<b>Circulation</b>	<b>Comments</b>
2.4	Helen Robinson	10/1/2022	Safeguarding team	Added DSL contact number
<b>3.0</b>	<b>Helen Robinson</b>	<b>08/03/2022</b>	<b>Safeguarding team, NTP team</b>	<b>Reviewed, approved &amp; Published</b>
<b>4.0</b>	<b>The Athena Programme</b>	<b>31/10/2022</b>		<b>Annual review and update New version</b>
4.1	The Athena Programme	26/01/2023	Safeguarding team	Amendment to replace references to peer on peer with child on child
4.2	Helen Robinson	23/10/2023	Safeguarding team	Updates to bring into line with KCSIE 2023
<b>5.0</b>	<b>Helen Robinson</b>	<b>26/10/2023</b>	<b>All staff</b>	<b>Reviewed, approved and published</b>
5.1	Helen Robinson	02/11/2023	All staff	Inclusion of section on SEND pupils
<b>6.0</b>	Helen Robinson	9/11/2023	All staff	Reviewed, approved and published