



# Purple Ruler Safeguarding Policy 2024/2025

## 1. Document Version Control

Document Authors Name	Bella Ma Nabintu Kahamire
Approved By	Bella Ma

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## 2. Introduction

All facilitators, employees and senior management of Purple Ruler are committed to providing a safe learning environment for our learners and to promote the welfare and protection of children and young people.

All staff must read, understand and follow this policy.

We pledge to strictly follow the statutory guidance outlined in KCSIE 2024 to continuously monitor, review and improve on our policies and procedures to ensure we have the best practice in safeguarding.

 [Keeping\\_children\\_safe\\_in\\_education\\_2024.pdf](#)

### We aim to keep learners safe by:

- Appointing a Designated Safeguarding Lead.
- Adopting child protection and safeguarding best practices through policies, procedures and code of conduct for all staff members.
- Providing effective management for all staff members through supervision, support, training and quality assurance measures to ensure all staff members have the knowledge and understanding of safeguarding and to follow our policies, procedures and codes of conduct confidently and competently.
- Ensure our recruitment process meets all safer recruitment requirements and all members of staff have passed the necessary checks before appointment.
- Recording, storing and using information securely and professionally in accordance with data protection legislation and guidance.
- Making sure schools, learners and parents/guardians are aware of our safeguarding policies and protocols to share concerns and relevant information with agencies who need to know and involve the necessary stakeholders appropriately.
- To use our policies and procedures to manage any allegations against staff members appropriately.
- To use our policies and procedures to understand school's safeguarding protocols for online/remote learning in order to ensure safeguarding concerns are attended to, communicated and reported to the school efficiently, effectively and appropriately in accordance with the school's policies.
- To ensure we have effective complaints and whistleblowing measures in place.
- To ensure we update our policies and procedures annually in accordance with the most up to date statutory regulations.

- Building a safeguarding culture where staff, schools, learners and parents/guardians treat each other with respect, with the learner's best interest at heart, work together to ensure the learner's welfare and protection and are comfortable about sharing concerns.

## Roles and Responsibilities

### Designated Safeguarding Lead:

- The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online) safety - KCSIE 2024.
- To fully understand the laws and regulations surrounding safeguarding. To be up to date with all regulations.
- To ensure that Purple Ruler has robust safeguarding policies and procedures in place and that all personnel, from senior management level to teaching staff, implement safeguarding ethos and practices in their daily operations.
- To help management team devise safeguarding and safer recruitment risk register and management plans.
- To assist the HR department with building a strict safer recruit selection and vetting procedure for UK nationals as well as overseas applicants. DSL is responsible for ensuring the recruitment and onboarding of new facilitators strictly follow this process.
- To ensure records are kept in the Single Central Record (SCR).
- To ensure all staff engaging in regulated activities are fully compliant before deployment.
- To assist the training team with building a robust safeguarding training programme for new facilitators as well as a refresher course for existing facilitators.
- To be responsible for reviewing the safeguarding policies and procedures to ensure Purple Ruler is compliant and our practices are up to date with safeguarding and child protection guidelines.
- To inform schools of Purple Ruler's safeguarding policies and procedures, share SCR upon request, obtain DSL or named person from the school and instruct the facilitators for each school group with any specific safeguarding requirements the school might have.
- To assist the QA team in building a robust class and facilitator monitoring process, reporting process and methods to provide further support for facilitators.
- To ensure all facilitators know how to report a concern. To ensure safeguarding reports are passed onto the schools.
- To support schools, authorities and agencies with follow up action when a report of concern is submitted and acted upon.
- To take part in strategy discussions and inter-agency meetings.

- Co-ordinate actions in the company and liaise with schools, academies and agencies over suspected or actual cases of child abuse.
- Identify the signs and symptoms of suspected or actual abuse and when to make a referral.
- Ensure all staff understand the link between mental health concerns and safeguarding and that such concerns may be an indicator of abuse.
- Authorise and support referral processes to the relevant and appropriate authority.
- Support staff when direct referral procedures apply.
- Keep full and accurate records of concerns, reports and referrals made and ensure this documentation is stored securely to maintain confidentiality.
- To complete a DSL refresher course annually.

DSL	Bella Ma	<a href="mailto:bellama@purpleruler.com">bellama@purpleruler.com</a> 01227 913313
DDSL	Candice Steytler	<a href="mailto:candice.s@purpleruler.com">candice.s@purpleruler.com</a> 01227 913313
Managing Director	Daniel Demarmels	<a href="mailto:daniel.d@purpleruler.com">daniel.d@purpleruler.com</a> 01227 913314

In the event where the DSL is unavailable, please contact one of the following senior management staff listed above.

## All members of staff working at Purple Ruler:

- Have the responsibility to provide a safe learning environment for children;
- Should be prepared to identify children who may benefit from early help;
- Should know the systems within the organisation that supports safeguarding;
- Should be expected to support social workers and other agencies following any referral;
- Should receive appropriate safeguarding and children protection training at induction, receive updated information and continuous training regarding safeguarding policies and best practices.
- Should be aware of their local early help process;

- Should be aware of the process for making referrals to local authority children's social care and for statutory assessments that may follow a referral;
- Should be aware of indicators of abuse and neglect, understand that children can be at risk of harm inside and outside of their home, school/college and online.
- Should know what to do if a child tells them they are being abused, exploited, or neglected.
- Should know how to manage the requirement to maintain an appropriate level of confidentiality.
- Should never promise a child that they will not tell anyone about a report of any form of abuse, as this may ultimately not be in the best interests of the child.
- Should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe.
- Should be aware that children may 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.

## What is Safeguarding?

Safeguarding in the context of UK legislation, particularly the Children's Act 2004, the Education Act 2002, and the guidance "Working Together to Safeguard Children" (2023), encompasses a wide range of measures designed to protect children's welfare.

1. **Children's Act 2004:** This Act emphasises the importance of inter-agency cooperation. Its core aim is to improve child protection and welfare services, enabling organisations and agencies to work together to ensure the wellbeing of children and young people. It introduced the concept of "safeguarding" to include not only protection from harm and abuse but also broader aspects of welfare such as health and development.
2. **Education Act 2002:** Section 175 of this Act places a statutory duty on local education authorities, governing bodies, and proprietors of educational institutions to safeguard and promote the welfare of children. This means ensuring their safety and protection within the educational environment, including having policies and procedures in place to address bullying, physical and emotional abuse, neglect, and other harms.
3. **Working Together to Safeguard Children (2023):** This guidance outlines how individuals and agencies should work together to safeguard and promote the welfare of children. It defines safeguarding 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 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.
- Promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children.
- Taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.

Child protection is part of safeguarding and promoting the welfare of children and is defined for the purpose of this guidance as activity that is undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

In summary, safeguarding according to these pieces of legislation and guidance, is a multifaceted approach that goes beyond just protection from abuse or harm. It encompasses a broader responsibility of ensuring children's overall well-being, including their health, education, and emotional development, and requires collaboration between various agencies and organisations.

## A Child Centred Approach to Safeguarding

- This child centred approach is fundamental to safeguarding and promoting the welfare of every child. A child centred approach means **keeping the child in focus when making decisions about their lives and working in partnership with them and their families.**
- Purple Ruler follows the principles of the Children Acts 1989 and 2004 - that state that the welfare of children is paramount and that they are best looked after within their families, with their parents/guardians playing a full part in their lives, unless compulsory intervention in family life is necessary.
- Children may be vulnerable to neglect and abuse or exploitation from within their family and from individuals they come across in their day-to-day lives. These threats can take a variety of different forms, including: sexual, physical and emotional abuse; neglect; domestic abuse, including controlling or coercive behaviour; exploitation by criminal gangs and organised crime groups; trafficking; online abuse; sexual exploitation and the influences of extremism leading to radicalisation. Whatever the form of abuse or neglect, practitioners should put the needs of children first when determining what action to take.
- Children are clear about what they want from an effective safeguarding system. These asks from children should guide the behaviour of practitioners.

## **Children have said that they need**

- **vigilance:** to have adults notice when things are troubling them
- **understanding and action:** to understand what is happening; to be heard and understood; and to have that understanding acted upon
- **stability:** to be able to develop an ongoing stable relationship of trust with those helping them
- **respect:** to be treated with the expectation that they are competent rather than not
- **information and engagement:** to be informed about and involved in procedures, decisions, concerns and plans
- **explanation:** to be informed of the outcome of assessments and decisions and reasons when their views have not met with a positive response
- **support:** to be provided with support in their own right as well as a member of their family
- **advocacy:** to be provided with advocacy to assist them in putting forward their views
- **protection:** to be protected against all forms of abuse and discrimination and the right to special protection and help if a refugee.

- Anyone working with children should see and speak to the child: listen to what they say; take their views seriously; and work with them and their families collaboratively when deciding how to support their needs. Special provision should be put in place to support dialogue with children who have communication difficulties, unaccompanied children, refugees and those children who are victims of modern slavery and/or trafficking.

## **A Co-ordinated Approach – safeguarding is everyone’ s responsibility**

- Everyone who works with children has a responsibility to keep them safe. No single practitioner can have a full picture of a child’ s needs and circumstances and, if children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.
- In order for organisations, agencies and practitioners to collaborate effectively, it is vital that everyone working with children and families, including those who work with parents/carers, understands the role they should play and the role of other practitioners. They should be aware of, and comply with, the published arrangements set out by the local safeguarding partners.

# **Working together to improve school attendance**

**Statutory guidance for maintained  
schools, academies, independent  
schools and local authorities**

**Published: 29 February 2024**

**Applies from: 19 August 2024**



### 3. Child Protection Policies and Procedures

#### Forms of abuse

It is important to be aware that many forms of abuse can take place either online, in person, in school or outside of school. According to KCSIE 2024, the main forms of abuse are as follows and all staff members should be aware of the indicators of abuse, neglect and exploitation.

#### Abuse

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. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. 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.

#### Physical 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

Emotional abuse is 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**

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 - child on child abuse.

## **Neglect**

Neglect is 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.

## **Domestic Abuse**

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, wellbeing, development, and ability to learn.

## **Female Genital Mutilation (FGM)**

Whilst **all** staff should speak to the designated safeguarding lead (or a deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on facilitators. If a facilitator, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the facilitator must report this to the police.

Under section 5B(11) (a) of the Female Genital Mutilation Act 2003, “teacher” means, in relation to England, a person within section 141A(1) of the Education Act 2002 (persons employed or engaged to carry out teaching work at schools and other institutions in England).

## **Mental Health**

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Schools and colleges can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy, and speaking to the designated safeguarding lead or a deputy.

## **Serious violence**

All staff should 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 or college, 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.

Please refer to Annex B extract from KCSIE 2024 for more information and details regarding specific forms of abuse and safeguarding issues.



**HM Government**

# **What to do if you're worried a child is being abused**

**Advice for practitioners**

**March 2015**



What\_to\_do\_if\_you\_re\_worried\_a\_child\_is\_being\_abused.pdf

# Early Help

According to KCSIE 2024, any child may benefit from early help, but all staff members should pay particular attention to the potential need for early help for a child who:

- has special educational needs (whether or not they have a statutory Education, Health and Care plan);
- has a mental health need;
- is a young carer;
- is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from education, home or care;
- has experienced multiple suspensions;
- is at risk of being permanently excluded from schools, colleges and is in Alternative Provision or a Pupil Referral Unit;
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a parent or carer in custody, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing alcohol and other drugs themselves;
- is at risk of so-called ‘honour’ -based abuse such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child.

## Signs and Indicators

All staff should be aware of indicators of abuse, neglect or exploitation (see below), understanding that learners can be at risk of harm inside and outside of school, home and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff can identify cases of learners who may need help or protection.

All staff should be aware that abuse, neglect or exploitations 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. When identifying abuse, staff should be mindful of the need to



consider the context of the culture, law and guidance of the relevant jurisdiction of the learner. It is important to consider whether the learner, their family and their society view the behaviour as unacceptable, as this will be a determining factor in whether the learner views the behaviour as abusive.

Staff should report behaviour in line with expectations of behaviour in the UK, and in determining the next steps the cultural context of the learner or learners involved will always be taken into consideration. For situations outside the UK, we take expert advice to ascertain what is and is not acceptable in the specific country and will consider the potential impact of reporting any such concerns with regard to the learner and their family. It is the responsibility of all members of staff to report all worries or concerns over safeguarding and welfare. It is not their responsibility to investigate or decide whether a learner has been abused. Signs and indicators may be the the following forms:

- be reluctant to turn on their webcam;
- have visible bruises, bleeding, burns, fractures or other injuries;
- show signs of pain or discomfort;
- look unkempt and uncared for;
- have difficulty in making or sustaining friendships;
- appear fearful;
- be reckless regarding their own or other' s safety;
- self-harm;
- show signs of not wanting to be at home;
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn;
- challenge authority;
- become disinterested in their education or have significant declines in performance;
- be constantly tired or preoccupied;
- be involved in, or particularly knowledgeable about drugs or alcohol;
- display sexual knowledge or behaviour beyond that normally expected for their age; and/or
- displaying out of character traits.

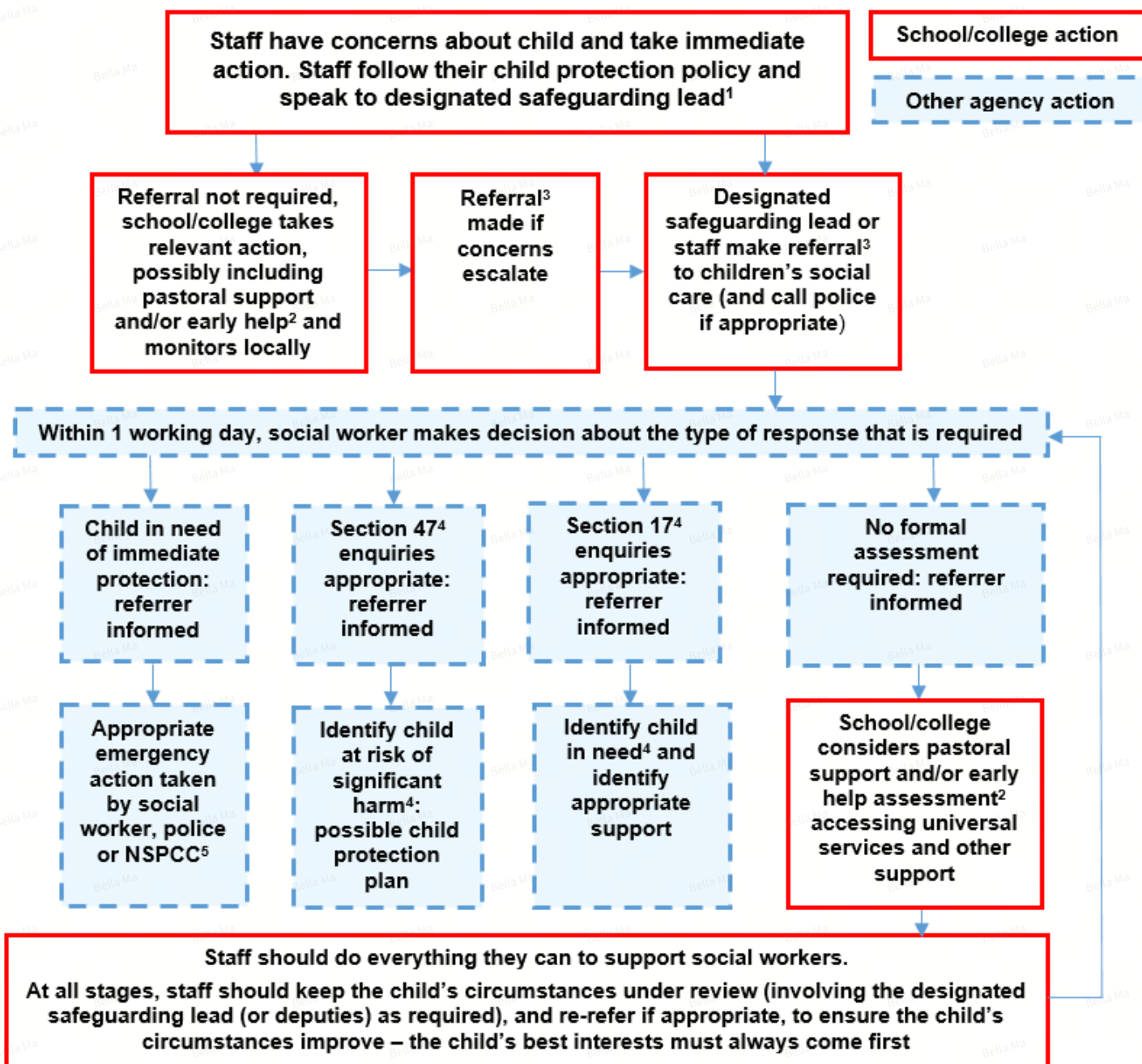
A member of staff may also see or hear something in the background of their online classes, which raises concern. Any concerns should be reported even if there is no conclusive evidence of abuse.

Here's an extract from "What to do if you' re worried a child is being abused (Advice for practitioners) - March 2015"

### **Some of the following signs might be indicators of abuse or neglect:**

- Children whose behaviour changes – they may become aggressive, challenging, disruptive, withdrawn or clingy, or they might have difficulty sleeping or start wetting the bed;
- Children with clothes which are ill-fitting and/or dirty;
- Children with consistently poor hygiene;
- Children who make strong efforts to avoid specific family members or friends, without an obvious reason;
- Children who don't want to change clothes in front of others or participate in physical activities;
- Children who are having problems at school, for example, a sudden lack of concentration and learning or they appear to be tired and hungry;
- Children who talk about being left home alone, with inappropriate carers or with strangers;
- Children who reach developmental milestones, such as learning to speak or walk, late, with no medical reason;
- Children who are regularly missing from school or education;
- Children who are reluctant to go home after school;
- Children with poor school attendance and punctuality, or who are consistently late being picked up;
- Parents who are dismissive and non-responsive to practitioners' concerns;
- Parents who collect their children from school when drunk, or under the influence of drugs;
- Children who drink alcohol regularly from an early age;
- Children who are concerned for younger siblings without explaining why;
- Children who talk about running away; and
- Children who shy away from being touched or flinch at sudden movements.

**Actions where there are concerns about a child**



If staff have any concerns about a child's welfare, they should act on them immediately based on the organisation's child protection policy and speak to the DSL.

In all cases related to child protection and safeguarding, all staff must treat all allegations seriously, in strict confidence and report efficiently to the Purple Ruler Designated Safeguarding Lead (DSL) or school group Designated Safeguarding Lead (DSL) or named person. Purple Ruler promotes a 'telling' culture - See it, Think it and Share it!

**The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.**

## Child Protection Procedures

# Preparations

## Working with Partnered Schools

Classes conducted for a school group usually take place within school hours, on school premises and facilitated by a member of staff at the school. For these groups of learners, the Designated Safeguarding Lead (DSL) will first attempt to obtain a copy of the school's safeguarding policies and procedures, and ensure that we have the Designated Safeguarding Lead (DSL) or named person contact details to report to.

Before a new school group begins with their first class with us, DSL will post a Safeguarding policies and reporting process notice in the facilitators communications group who are assigned to this school, this will include:

- A copy of the safeguarding policy and KCSIE Part 1 in case any facilitator needs to refresh their memories on safeguarding policies.
- A specific reminder of what to do when a learner discloses anything concerning. List the name and contact details of the DSL from the school or a named person that the facilitator should tell the learner to report to when they disclose this information.
- A specific reminder for facilitators to complete the safeguarding report form immediately if they see or hear anything that is concerning and for them to inform a member of the management team immediately after they have completed this form: [Safeguarding Report Form](#)
- A specific reminder that in case of any serious incident or immediate danger or harm, if facilitators are not able to get assistance from the teacher of the class at the school, they must call the school immediately. If the facilitator is not able to call the school directly, they must inform the DSL via Lark for them to make contact.

## Working with LA Referrals

- Learners who are referred by LA typically access their online classes from home rather than onsite of a school. We require that there's a parent or guardian at home with the learner during the hours of them accessing their online lessons. In cases where this isn't possible, the DSL will speak with the LA programme representative to work out an alternative safeguarding monitoring strategy for the learner. This may include, obtaining an emergency contact for the learner, obtaining their home address in case of emergencies etc.
- Learners who will be attending their online classes from foster home, children's homes, specialist residential units or secure children's homes. We would require for the learner to be supervised by a member of staff there when the learner is accessing their online classes. We may ask for a point of contact at these locations to reach out to in cases of need.



- The DSL will send the same reminders as above in the facilitator groups who will be teaching these learners.

## **Serious Incident or Immediate Danger and Harm:**

### **Definition:**

A serious incident that takes place during an online class for a school group, where:

- A learner is at risk of, being exposed to or having disclosed that they experienced significant harm;
- A crime has been committed.

### **Examples:**

- Where a learner is alleged to have seriously harmed themselves or another person.
- Serious concerns or signs that a learner is engaged in extremist behaviour, protracted bullying, sexual abuse or harassment.
- Death.

### **Procedure**

#### **Learners from a Partnered School:**

1. Person identifying the incident reports to school's DSL or named person if the concerned learner is at immediate risk of harm. Information can be found on the school group on Lark. Where this information isn't available, the person identifying the incident reports to the Purple Ruler Designated Safeguarding Lead (DSL). Designated Safeguarding Lead (DSL) will report the incident to school's named person.
2. If the identifying person is a facilitator, and the incident is taking place during a class. The facilitator must remain in the class, remain calm and collected, and try to keep the other learners calm and distant from the incident. The facilitator needs to contact a member of management in their group chat immediately for support.

#### **Learners from LA referral:**

1. Person identifying the incident should notify the DSL immediately via Lark call or messaging, whichever is faster. The DSL or another named person, depending on whether the DSL needs to monitor the situation, should call the emergency contact immediately. The Person who has identified the incident should try to maintain some form of communication with the learner, try to keep them calm.
2. If the DSL cannot get through to the emergency contact, they should try the next emergency contact or call the emergency services.
3. If the learner is located in a children's home or residential unit, the DSL will call the unit and inform an adult in the building.



4. After taking initial action, the incident must be reported to PR Designated Safeguarding Lead (DSL) if it has not been reported to them in the previous steps.
4. The DSL may make a referral to local authority children's social care and where appropriate, the police. The police can also make referrals directly to the local authority, <https://www.gov.uk/report-child-abuse-to-local-council>
5. Person identifying the incident must record the incident on the Safeguarding Form.
6. Designated Safeguarding Lead (DSL) will review the report, follow up with the school and support the school's actions that follow.
7. Record actions taken in the incident.
8. Designated Safeguarding Lead (DSL) carries out a risk assessment of procedures and actions taken for prevention and improvement in safeguarding policies and procedures.

## Safeguarding and Welfare Concerns:

In cases where the facilitator or any person who suspects that a learner may be at risk but have no 'real' evidence, where possible the person identified the risk should ask if the learner is okay and offer their support in any way. Then follow the procedure to share the incident.

1. Complete the [Safeguarding Report Form](#) immediately and inform a member of the management team, ideally the DSL, but facilitators are encouraged to report it to anyone whom they feel comfortable with. If the person whom they have reported to isn't the DSL, the member of staff must inform the DSL immediately.
2. The DSL will review and investigate the nature of the report within 24 hours of receiving it. This may include speaking with the facilitator and reviewing the lesson recording. Minor concerns that are deemed to be behavioural issue reports will be reported in accordance with the behaviour management policy. Otherwise, reports will be sent to the school's Designated Safeguarding Lead (DSL) or named person within 48 hours upon receiving the report.
3. Purpler Ruler shall only follow the policies and procedures and instructions of the school, and shall not carry out investigation independently.
4. All allegations or suspicions shall be referred to the school no matter the level of significance.

## Recording Concerns

All concerns and correspondence will be kept in a secure, confidential safeguarding case management system. The learner's circumstances will be kept under review and the school will

be made aware again if in the learner's best interest. All concerns, discussions and decisions made, and the reasons for those decisions, are recorded in writing. Records should include:

- The date and time of the incident;
- The date and time of the disclosure of the incident;
- The date and time the record is being made;
- The name, role, and contact details of the person the concern was originally reported to;
- The name, role and contact details of the person making the report (if this is not the same person as above);
- The name, age and other relevant information about the learner who is the subject of concern;
- The names of all parties involved in the incident including any witnesses;
- What was said and done and by whom;
- Follow up actions, and the time and date it was reported to the school.

Staff should be aware that notes of such reports could become part of an assessment by social care and/or a criminal investigation.

## Victim Disclosure

It takes courage for anyone to disclose that they are being or have been abused. It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward and that they will be supported and kept safe. Regardless if they are a member of staff or learner, when a victim discloses any risks to their safety or wellbeing, one should approach the conversation with the following considerations:

- allow them to speak freely and do not be afraid of pauses or silences;
- remain calm and avoid overreaction;
- offer reassurance and general words of comfort;
- not ask investigative questions, but rather prompt, if necessary, with open questions – where, when, what, tell, explain, describe etc. If appropriate, staff can ask learners if they have been harmed and what the nature of that harm was;
- recognise that trauma can impact memory and so learners may not be able to recall all details or timeline of abuse;
- explain at an appropriate time that, in order to help, the information must be passed on to relevant people in positions of responsibility;
- not reprimand the learner for failing to disclose earlier; and

- establish next steps - this conversation will be escalated to Designated Safeguarding Lead (DSL) and someone will be in contact with them with further support.

After a disclosure, seek support, if distressed, the person who has disclosed this information should never be given the impression that they are creating a problem by reporting abuse. Nor should they be made to feel ashamed for making a report. Abuse that occurs online or outside of education should not be downplayed and should be treated equally seriously.

## Collecting Evidence

If an incident takes place, the person identifying the risk or receiving disclosure, should ensure they capture and collect evidence.

- All classes are recorded automatically on The Lesson Space. However, one should record the time cap of when the incident occurred.
- Screenshots of contents in the chat box.

These files should be passed to Designated Safeguarding Lead (DSL) to incorporate into the report.

## 4. Prevent, Channel and Radicalisation

Please see our [Purple Ruler Prevent Duty Policy](#) for further details on our procedures.

**Extremism:** The Government defines extremism as “vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs.” This also includes calls for the death of members of the armed forces, whether in the UK or overseas.

**Radicalisation:** is the process of a person legitimising support for, or use of, terrorist violence.

**Terrorism:** is an action that endangers or causes serious violence to a person/people; causes serious property damage; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

We recognise our duty to help prevent young people from being drawn into extremist viewpoints and radicalisation. In the UK, Prevent Duty is the duty in the Counterterrorism and Security Act 2015 on specified authorities, including providers, to have due regard to the need to prevent people from being drawn into terrorism.

There is no single way of identifying an individual who is likely to be susceptible to radicalisation, but there are a number of early indicators of radicalisation or extremism, which may include:

- showing sympathy for extremist causes;
- glorifying violence, especially to other faiths or cultures;
- making remarks or comments about being at extremist events or rallies;
- evidence of possessing illegal or extremist literature;
- advocating messages from illegal organisations or other extremist groups;
- out of character changes in dress, behaviour and peer relationships;
- secretive behaviours including online searches or sharing extremist messages or social profiles;
- intolerance of difference, including faith, culture, gender, race or sexuality;
- artwork or writing that displays extremist themes;
- attempts to impose extremist views or practices on others;
- verbalising anti-Western or anti-British views; and
- advocating violence towards others.

The Channel procedures that we, at Purple Ruler, have adopted to ensure that we adhere to our duty under the Prevent Duty includes ensuring that all members of staff who have concerns about a learner make these concerns known to the Designated Safeguarding Lead (DSL) at the earliest opportunity. The Designated Safeguarding Lead (DSL) will then make a judgement as to the most appropriate course of action.

Non-emergency advice for staff is available via the DfE's helpline +44 (0)20 7340 7264 and by email at [counter-extremism@education.gsi.gov.uk](mailto:counter-extremism@education.gsi.gov.uk)

## 5. Child on Child Abuse

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk. Below are some safeguarding issues all staff should be aware of.

# What is bullying or child-on-child abuse?

## ! [Extract taken from "Preventing and Tackling Bullying - Advice for headteachers, staff and governing bodies" - July 2017]

Bullying is behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally. Bullying can take many forms (for instance, cyber-bullying via text messages, social media or gaming, which can include the use of images and video) and is often motivated by prejudice against particular groups, for example on grounds of race, religion, gender, sexual orientation, special educational needs or disabilities, or because a child is adopted, in care or has caring responsibilities. It might be motivated by actual differences between children, or perceived differences.

Stopping violence and ensuring immediate physical safety is obviously a school's first priority but emotional bullying can be more damaging than physical; facilitators and schools have to make their own judgements about each specific case.

Many experts say that bullying involves an imbalance of power between the perpetrator and the victim. This could involve perpetrators of bullying having control over the relationship which makes it difficult for those they bully to defend themselves. The imbalance of power can manifest itself in several ways, it may be physical, psychological (knowing what upsets someone), derive from an intellectual imbalance, or by having access to the support of a group, or the capacity to socially isolate. It can result in the intimidation of a person or persons through the threat of violence or by isolating them either physically or online.

Low-level disruption and the use of offensive language can in itself have a significant impact on its target. If left unchallenged or dismissed as banter or horseplay it can also lead to reluctance to report other behaviour. Early intervention can help to set clear expectations of the behaviour that is and isn't acceptable and help stop negative behaviours escalating. Since September 2014 a greater focus on how well school leaders tackle low-level disruption was included in Ofsted inspections.

## Cyber-bullying



The rapid development of, and widespread access to, technology has provided a new medium for ‘virtual’ bullying, which can occur in or outside school. Cyber-bullying is a different form of bullying and can happen at all times of the day, with a potentially bigger audience, and more accessories as people forward on content at a click.

The Education Act 2011 amended the power in the Education Act 1996 to provide that when an electronic device, such as a mobile phone, has been seized by a member of staff who has been formally authorised by the headteacher, that staff member can examine data or files, and delete these, where there is good reason to do so. This power applies to all schools and there is no need to have parental consent to search through a young person’s mobile phone.

## Identifying child-on-child abuse

This 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 (sometimes known as ‘teenage relationship abuse’ );
- 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). Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive - but children still need to know it is illegal - whilst non-consensual is illegal and abusive;
- 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; and
- 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).

## **Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)**

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

### **Child Criminal Exploitation (CCE)**

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pick-pocketing. They can also be forced or manipulated into committing vehicle crimes or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

### **Child Sexual Exploitation (CSE)**

CSE is a form of child sexual abuse. Sexual abuse 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 clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse, including via the internet.

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge for example through others sharing videos or images of them on social media.

CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited for example they believe they are in a genuine romantic relationship.



Department  
for Education

# Child sexual exploitation

**Definition and a guide for practitioners,  
local leaders and decision makers  
working to protect children from child  
sexual exploitation**

**February 2017**

## Behaviour Policies and Procedures

For more details, please see our [Purple Ruler Behaviour Policy 2024 - 2025](#)

### Promoting Positive Behaviour

1. All learners have the right to be treated with respect and dignity.
2. All learners have the right to learn in a safe and supportive environment.
3. Tutors should use positive reinforcement to encourage good behaviour and will only use sanctions as a last resort.
4. Purple Ruler will work with schools, parents and carers to support the development of good behaviour in learners.
5. Tutors should set clear expectations for behaviour in their classes.
6. Tutors should intervene early to prevent problems from escalating where possible.
7. Tutors should deal with unacceptable behaviour in a fair, sensitive, professional and consistent way.
8. Tutors must report any concerns about a child's safety or welfare to the appropriate person immediately.

### Procedure

At the time of creating this version of the policy, the organisation is only taking on group online classes when working with a school. We work closely with schools when dealing with behavioural or safeguarding issues. When any bullying behaviours are displayed during class, the online tutor will intervene in an attempt to stop the situation from developing further based on the principles and policies written above. The online tutor should also report this as a safeguarding concern. The DSL will report this back to the school in case it has already been recorded previously as a repeated behaviour.

When the company develops group classes outside of school partnerships, we will expand on our approach to how this will be dealt with independently and with parental support.

## 6. Remote learning safety

For further details, please see out [Purple Ruler Online Safety Policy](#)

If you work as an educator either online or face to face that's outside of Purple Ruler, we recommend you are well equipped with knowledge, understanding and procedures for safeguarding your independent learners. Here's a useful article by NSPCC Learning [Safeguarding and child protection for tutors | NSPCC Learning](#)

Purple Ruler provides online tuition to schools and individual learners who signs up for our services outside of their school environment. We strictly follow the safeguarding and child protection policies and procedures set out in this document in line with the necessary legislations and guidances. In addition to this, here are some additional considerations for our online practices.

### Learning Platforms

- The learning platforms we use to conduct our classes are specifically designed and set up for the purpose of online learning.
- Classes are automatically recorded for safeguarding purposes.
- Learners can only enter their online classrooms when the tutor admits them from the lobby.
- When tutors share their screen to share certain content for the lesson, they must ensure to turn off their notifications on the screen, and the content is suitable for the age group they are teaching. They must not share any other content on their screens that's not relevant to the class.

### Parental and Guardian Consent

- Parents or guardians must provide their consent for their child to participate in online learning. This is either collected via the school or independently by Purple Ruler depending on the nature of the programme.
- Parents or guardians will be provided with information on how the classes are conducted, what information we require regarding the learner, how this information is used and that the classes are recorded.



## Children's needs

- Although we encourage all learners to have their cameras and microphones on for better engagement with the lesson, however, we understand that some learners are shy and do not want to have these on in order to participate in the class.
- Tutors must not discriminate or punish the learner if they do not want to have their camera or microphone on.
- Learners are welcome to use the chat function to participate.
- Facilitators must have their camera and microphone on at all times in the presence of a learner to facilitate the class.

## Adult to child ratios

Our group ratios are kept at a maximum of 1 adult to 6 learners in a group.

## 7. SEND Learners

For more details, please see our [Purple Ruler SEND and Inclusivity Policy 2024-2025](#)

- We pay close attention to learners with SEND who are enrolled on our online programme. Facilitators are notified of any SEND learners in the group. Facilitators must be aware that learners with SEND face additional safeguarding challenges both online and offline.
- Facilitators must report any concerns urgently so that we can report this to the school at the first incidence to be dealt with.
- When selecting tutors to take on classes with SEND learners, the HR team must select facilitators who have SEND experience.

## 8. Mental Health

- Mental health problems can sometimes show up as challenging behaviour. Staff need to be able to identify the signs of mental health problems in children and young people to get the right support. Some examples of challenging behaviours that may be linked to mental health problems include:
  - Withdrawing from activities;
  - Changes in appetite or sleep patterns;

- Increased levels of anxiety or aggression;
  - Self-harm;
  - Mental health problems in children.
- 1 in 8 children will experience a mental health problem before age 18. The most common mental health problems in children include:
  - Anxiety
  - Depression
  - Attention deficit hyperactivity disorder (ADHD)
  - Eating disorders
  - Obsessive-compulsive disorder (OCD)
  - Risk and protective factors
- There are a number of factors that can increase the risk of a child developing a mental health problem. These include:
  - Family history of mental health problems;
  - Exposure to trauma or abuse;
  - Lack of social support;
  - Difficulties at school.
- There are also several factors that can protect children from developing mental health problems. These include:
  - A strong sense of self-esteem;
  - Good coping skills;
  - A supportive family and social network;
  - Access to good quality mental health care.
- Tutors must report their concerns via the safeguarding form when any signs of the above are identified in case the school already has similar concerns. The DSL will report this in accordance with procedures set in place for responding to a concern.

## 9. Response to children who are absent from classes on repeated occasions

For more details, please see our [Purple Ruler Learner Attendance and Registers Policy](#)

- Purple Ruler is responsible for reporting attendance to the school for safeguarding purposes. Attendance is recorded immediately after the class is completed. Schools can either log into their portal to see these reports immediately or they will be sent a weekly report at the beginning of each week for the previous week.
- The client care team will raise specific attendance reports of any learner who has missed 3 classes consecutively to the school.

## 10. Children who are lesbian, gay, bi, or trans (LGBT), or gender questioning

- Children who are lesbian, gay or bisexual can be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay or bisexual can be just as vulnerable as children who are.
- Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. At Purple Ruler, we want to assist the schools we work with by reducing the barriers to providing a safe space for children who are LGBT to speak out or share their concerns.
- Caution is necessary for children who are questioning their gender as there remain many unknowns about the impact of social transition and children may have wider vulnerabilities, including complex mental health and psychosocial needs, and in some cases additional diagnoses of autism spectrum disorder and/or attention deficit hyperactivity disorder.
- Purple Ruler will take a cautious approach and consider the broad range of the individual needs of children who are questioning their gender in partnership with the school, parents or guardians.
- Facilitators must remember to inform the child, where there is a safeguarding concern, that they will need to share this information.
- Facilitators must ensure the classes are inclusive to avoid any opportunities for bullying.



GOV.UK



<https://www.gov.uk/government/publications/relationships-education-rela...>

### Relationships and sex education (RSE) and health education

Statutory guidance on relationships education, relationships and sex education (RSE) and health education.

## 11. Safer Recruitment and Selection Policies and Procedures

For more details, please see our [📄 Purple Ruler Safer Recruitment and Selection Policy](#)

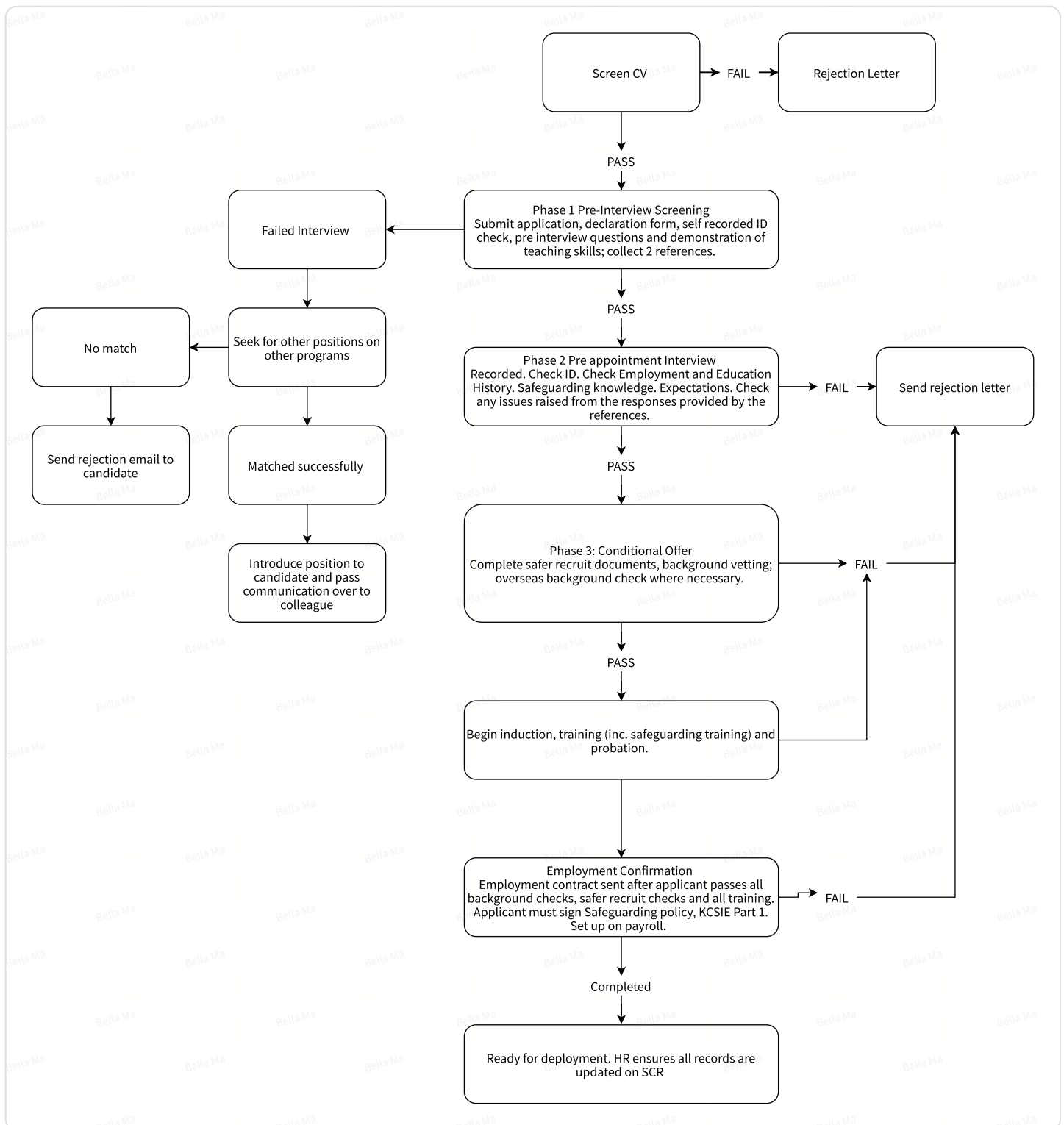
Purple Ruler maintains a high standard in recruitment. Facilitators are employed by the company. We have a rigorous recruitment and training process to ensure our tutors specialise in the subject they are teaching, satisfy safer recruitment regulations, adopt the Purple Ruler pedagogy and adhere to our safeguarding policies and procedures.

Beyond ensuring rigorous training for our facilitators, all staff at Purple Ruler undergo Safeguarding Training at induction.

Our Designated Safeguarding Lead as well as our Head of HR are on the interview panel and participates in the live interview phase for each applicant. The Head of HR is required to successfully complete the Safer Recruitment training. This training is renewed annually.

Applicants are required to go through the following application and training process.

## Selection Process Flowchart



## 12. Concerns or Allegations Relating to Staff that may meet the harm threshold

This part of the policy should be followed where it is alleged that anyone working for Purple Ruler who engages in regulated activities with children under the age of 18 has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;



- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

[KCSIE Para 355] more information and explanations are offered in

<https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs#relevant-conduct-in-relation-to-children> to assist with identifying harmful behaviour towards children.

Any of the above displayed outside of their working duties for Purple Ruler may indicate a member of staff's unsuitability to work with children.

When an allegation is made against a member of staff working for or on behalf of Purple Ruler or a concern expressed about their conduct relating to learners, set procedures must be followed. It is rare for a learner to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events can happen, and a learner may make an allegation against an innocent party because they are too afraid to name the real perpetrator.

## Duty of Care

We understand that it is a very difficult time for all those involved when an allegation is reported. Purple Ruler provides a duty of care in the following manner:

### **To Employees, we will:**

1. Manage and minimise stress caused by the allegation.
2. Inform the individual, guided by the LADO and police where necessary.
3. Advise contacting a trade union representative or colleague for support.
4. Appoint a named representative to provide updates.
5. Offer access to counseling or medical advice if needed.
6. Maintain confidentiality and avoid unwanted publicity regarding allegations against staff.

### **To schools, learners and parents/guardians, we will:**

1. Fully cooperate with the school's duty of care policies to inform parents or carers of the allegation.
2. Keep them informed about the cases' progress in relation to the child.

## Initial response to an allegation

1. When we have identified a child has been harmed, that there may be an immediate risk of harm to a child or if the situation is an emergency, we will contact Bristol LADO, children's social care and, as appropriate, the police immediately.

2. The DSL will be responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children's social care. The DSL will also inform the school immediately and assist the school with their procedures of responding to an allegation.
3. The case manager, **CEO - Daniel Demarmels**, will discuss with the LADO, the nature, content and context of the allegation and agree on a course of action.
  - a. Purple Ruler works with schools across the country. We will first consult with Bristol LADO as an immediate initial response to any emergencies.
    - Complete the [LADO referral form](#) **within one working day** of becoming aware of the allegation
    - **Local Authority Designated Officer (LADO)** – Tel: 0117 903 7795
    - **Email:** [LADO@bristol.gov.uk](mailto:LADO@bristol.gov.uk)
  - b. Where there's speculation that there may be an immediate risk of harm to a child, Purple Ruler will contact Bristol LADO, who is involved in the management and oversight of individual cases using the above means.
4. An evaluation of the allegation will begin on the day of when the allegation is received, no longer than the following business day.
5. If proven necessary, we will contact the National LADO network
  - **National LADO Network:** 0300 022 0070
  - **Childline:** 0800 1111
  - **NSPCC:** 0808 800 5000

## Reporting a concern relating to staff

- A member of staff who is concerned about the conduct of a colleague or management team towards a learner must remember that the welfare of the learner is paramount. No member of staff will suffer a detriment for raising a genuine concern.
- Allegations or concerns against members of staff, should be reported to the Designated Safeguarding Lead (DSL). An allegation or concern against the Designated Safeguarding Lead (DSL) should be reported directly to the CEO, or to other members of the management team who will then report it to the CEO. Staff may also report any allegations or concerns directly to the police if they believe direct reporting is necessary to secure action and they feel a crime has been committed. Staff may additionally use the NSPCC whistleblowing helpline number, 0800 028 0285, if they feel that staff conduct may not have passed the threshold for a criminal offence but raises concerns which are not being addressed within the internal reporting mechanisms. Allegations against a former member of staff no longer working for us should be referred to the police. Staff can also use the National LADO Network helpline.

- Reports can be made verbally but should be supported by a dated and timed note of what has been disclosed or noticed, said or done.
- Designated Safeguarding Lead (DSL) must log the incident, before the end of the day. It is vital that expressions of concern that do not necessarily amount to 'allegations' are reported, particularly if there are repeated reports of such concerns and/or questionable conduct.
- It may be that the concern expressed has been raised by another party. If there are repeated reports of such concerns and/or questionable conduct, a pattern of unacceptable behaviour may be identified.
- Calls and meetings will be recorded, however, this will be protected by our data protection policy. This will only be shared with the police or local authorities to help with their investigation.
- Where the case manager is concerned about the welfare of other children the member of staff in question comes into contact with, they should discuss these concerns with the DSL. A risk assessment of the situation should be conducted. The case manager and DSL may decide to make a referral to the National LADO Network.

## Reporting an incident relating to staff

- Staff, parents, and members of the Governing Body are reminded not to investigate the matter themselves, not to make assumptions or offer alternative explanations for behaviours, or to promise confidentiality to the alleged victim(s).
- The incident must be reported to the Designated Safeguarding Lead (DSL). In their absence, it must be reported to the other listed people at the top of this document.

## Evaluation Procedures

DSL and the CEO will evaluate and investigate the allegation and its severity. Additionally, gather as much information as possible to be passed on to the school and LADO where necessary. This may include:

1. Name of the person who has made the allegation.
2. The name of the person who is being accused.
3. The date and time of the alleged abuse.
4. A description of the alleged abuse.
5. If the abuse took place in an online class, we will provide the recording link of the class.
6. If the child in question is outside of the schools we work with, we will ask for other information related to the child, including their relationship to the adult who is being accused etc.

Depending on case by case situation, we may need to speak with the person who has made the allegation in detail. This conversation may be recorded.

## No Further Actions

Where the initial discussion leads to no further action, the case manager and the LADO will:

1. Record the decision and justification for it.
2. Agree on what information should be put in writing to the individual concerned and by whom.

## Further Enquiries

1. Based on the initial evaluation, the case manager and the LADO should determine the nature and complexity of the allegation. They should decide whether immediate police or local authority children's social care intervention is required.
2. The LADO and case manager should also determine how the investigation will be conducted. If it's straightforward, the investigation may be led by the senior management of the company. If it's complex, an independent investigator may be required.
3. The case manager should monitor the progress of the investigation to ensure a thorough and fair process. The LADO will only provide advice and guidance throughout the process.
  - a. The first review should take place no later than four weeks after the initial assessment.
  - b. Subsequent reviews should ideally be at fortnightly intervals (and no longer than monthly) if the investigation continues, with dates set at the review meeting.
4. Upon conclusion of the investigation, take appropriate action based on the findings.
  - a. Document all steps and decisions for record-keeping.
  - b. Continue to liaise with the LADO as needed for ongoing guidance.

## Suspension

1. Where allegations are made relating to a member of staff who is currently engaging in regulated activities, depending on the severity of the report, the DSL may decide to pause the member of staff's classes until the allegations are resolved.
2. In other cases, the DSL may decide to move the child to a different group, if this is in the best interest of the child or children concerned.

3. If the facilitator in question is working on multiple programmes at the same time, we will evaluate their conduct in other programmes and decide whether we will pause their service just on the programme that received the allegation report or on all.

## Responding to Low Level Concerns

A low-level concern is when behaviour is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, but when this behaviour does not meet the harm threshold set out above. Examples of such behaviour could include, but are not limited to:

- being overly friendly with learners;
- having favourites;
- engaging with a learner on a one-to-one basis without recording the meeting; and/or
- using inappropriate sexualised, intimidating or offensive language.

Sharing low level concerns is vital to create and embed a culture of openness, trust and transparency in which our values and expected behaviour, as set out in the staff code of conduct, are constantly lived, monitored and reinforced by all staff.

Sharing concerns includes self-referral, where, for example, a staff member may have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Where a low-level concern is raised, this will be dealt with promptly and appropriately and a record of the concern kept allowing any patterns of unacceptable behaviour to be identified. To address low level concerns, we will:

- ensure staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others;
- encourage staff to share any low-level safeguarding concerns;
- address unprofessional behaviour and support the individual to correct it at an early stage;
- provide a responsive, sensitive and proportionate handling of such concerns when they are raised; and
- monitor low-level concerns to help identify any weaknesses in the safeguarding system.

## Responding to crimes that reach the threshold

If an allegation meets the criteria listed above under the section 'Threshold for Concerns', it will be dealt with according to the statutory guidance set out in Keeping Children Safe in



Education (DfE, September 2023).

On receiving a reported concern or when the situation is identified as such in the evaluation process, the DSL will proceed as follows:

1. Produce a case report, taking detailed notes from the source, including the date and time of the incident.
2. Report to LADO (Local Authority Designated Officer) immediately whilst investigating the incident. Including watching the playback of the recorded lesson.
3. The DSL and CEO will liaise with the LADO to discuss the nature, content and context of the allegation and agree on a course of action. At this stage, we will consider the following:
  - a. What information needs to be shared;
  - b. Identify what other information might be needed;
  - c. Consider whether the alleged perpetrator should continue to work or if suspension is more appropriate;
  - d. Whether to inform the member of staff at this stage;
  - e. Whether to pause the member of staff's classes;
  - f. Discuss support strategies with the school on helping the learner;
  - g. Decide what action is needed and who needs to be involved and informed.
4. Proceed with the course of action confirmed with LADO and/or police.

The decisions about the course of action are taken on a case by case basis. The safety of any learner is of absolute essence, but also remember that the member of staff, against whom an allegation has been made, has the right to remain anonymous and to expect any allegations to be investigated as expeditiously as possible.

Any course of action is subject to a risk assessment. Decisions would also follow the guidance of the LADO and/or police. If the parties involved in these discussions consider it necessary, a Strategy Meeting is arranged, usually by Social Services, which will involve representatives from the LADO, the police and the provider (e.g., the Principal, DSL or Chair of Management Board, as appropriate). From the above discussions, there are three possible courses of action:

- It may be the subject of a police force and/or joint police and Social Services investigation and possible action through the courts; or
- It may be the subject of a disciplinary investigation; or
- The matter may be remitted to the provider to be dealt with.

The following definitions will be used when determining the outcome of allegation investigations:

**Substantiated:** there is sufficient evidence to prove the allegation.

**Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive.

**False:** there is sufficient evidence to disprove the allegation.

**Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation; the term, therefore, does not imply guilt or innocence.

**Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

If Social Services and the police decide to take no action, we will still need to consider what further investigation is necessary. If there is a case to answer, a disciplinary hearing will be called, which could lead to dismissal.

Where a criminal investigation has taken place and either (i) a trial has resulted, (ii) the investigation has been closed without charge or (iii) a decision has been taken not to prosecute a case after charge, the DSL will discuss with the LADO what, if any, further action is required as regards the member of staff concerned and the sharing of information obtained by the agencies involved in assisting any further action to be taken by us.

Where a disciplinary investigation is required, the investigation should be conducted in accordance with our disciplinary procedure.

## Action upon conclusion of a case

### Referral

We will refer to the DBS (following consultation with the LADO) any person who has been removed from working in regulated activity, and it believes the person may have harmed, attempted to harm, incited another to harm or put a learner at risk of harm or if there is reason to believe the person may have committed one of a number of offences listed under the Safeguarding Vulnerable Groups Act (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009. 'Removal from working' for these purposes will include dismissal, non-renewal of a fixed term contract, no longer using a supply facilitator engaged directly or supplied by an agency, terminating the placement of a trainee or volunteer, no longer using staff employed as a contractor and resignation or voluntary withdrawal from any of the above.

A referral will be made to the Teaching Regulation Agency (TRA) via the [GOV.UK](https://www.gov.uk) website where a facilitator has been dismissed (or might have been dismissed had he/she not resigned) and a prohibition order may be appropriate.

Substantiated safeguarding allegations that meet the harm threshold will be included in references, facts will be included in references not opinions.

## Returning to work

In cases where it is decided on the conclusion of the case that a person who has been suspended can return to work, we will consider how best to facilitate this. We appreciate that most people would benefit from some help and support when returning to work after a very stressful experience. Depending on the individual's circumstances, a phased return and/or the provision of a mentor to aid and support in the short term may be appropriate. We will also consider how the person's contact with the learners who made the allegation can best be managed if they are still attending the educational provision.

## False Allegations

If an allegation is determined to be false, unfounded, unsubstantiated or malicious, the DSL will work to support the school in its actions to help the learner. If an allegation is shown to have been deliberately invented or malicious, Purple Ruler will inform the main education provider who can consider whether any disciplinary action is appropriate against the learner who made it.

In these cases, it will not be included in employer references.

## Record Keeping

A central record of all allegations and concerns (and connected documents) against members of staff will be kept securely, separate from normal staff records, and with access limited to the DSL, as well as Human Resources representatives and officers who may be key workers for cases. The only exception to this requirement for permanent recording is where allegations have been found to be malicious. In such cases, all records will be removed from staff personnel files. The record of allegations may provide clarification in cases where a future DBS disclosure reveals information from the police about an allegation that did not result in a criminal conviction. It will also help to prevent unnecessary re-investigation if, as occasionally happens, an allegation re-surfaces after a period. The record will be retained at least until the member of staff involved has reached normal retirement age, or for a period of 10 years from the date of the allegation if that is longer. An allegation which was proven to be false, unsubstantiated or malicious will not be included in references for staff. Where there have been concerns about a member of staff and he or she leaves us to work elsewhere, the DSL will consider the question of passing the concerns to the new employer or authority. We will pass allegations or concerns affecting a learner on to his or her next provider, if applicable.

# 13. Data Protection, Filtering and Monitoring

## Data Protection, GDPR & Information sharing when there's a safeguarding concern:

We will strictly follow our data protection and GDPR policies as well as the policies set out in KCSIE 2024 when handling data for record keeping. However, GDPR laws should not prevent staff members from voicing or sharing concerns in order to protect the safety and wellbeing of children.

# The General Data Protection Regulation (GDPR) and Data Protection Act 2018

The General Data Protection Regulation (GDPR) and the Data Protection Act 2018 introduce new elements to the data protection regime, superseding the Data Protection Act 1998. Practitioners must have due regard to the relevant data protection principles which allow them to share personal information,

The GDPR and Data Protection Act 2018 place greater significance on organisations being transparent and accountable in relation to their use of data. All organisations handling personal data need to have comprehensive and proportionate arrangements for collecting, storing, and sharing information.

**The GDPR and Data Protection Act 2018 do not prevent, or limit, the sharing of information for the purposes of keeping children and young people safe.**

To effectively share information:

- all practitioners should be confident of the processing conditions, which allow them to store, and share, the information that they need to carry out their safeguarding role. Information which is relevant to safeguarding will often be data which is considered 'special category personal data' meaning it is sensitive and personal
- where practitioners need to share special category personal data, they should be aware that the Data Protection Act 2018 includes 'safeguarding of children and individuals at risk' as a condition that allows practitioners to share information **without consent**
- information **can be shared legally without consent**, if a practitioner is unable to, cannot be reasonably expected to gain consent from the individual, or if to gain consent could place a child at risk.
- relevant personal information can be shared lawfully if it is to keep a child or individual at risk safe from neglect or physical, emotional or mental harm, or if it is protecting their physical, mental, or emotional well-being.



# The seven golden rules to sharing information

1. Remember that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners, or your information governance lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.
5. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely (see principles).
7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.



HM Government

# Information sharing

## Advice for practitioners providing safeguarding services to children, young people, parents and carers

July 2018



Information\_sharing\_advice\_practitioners\_safeguarding\_services (1).pdf

### Filtering and Monitoring:

Learners who are taking part in Purple Ruler's learning support sessions will be accessing their online session via their school or personal devices. Purple Ruler will follow the school's Filtering

and Monitoring policies and procedures. At no point will learners be accessing the online environment from Purple Ruler's network or device.

During the whitelisting and stress test, we will also check with the school's IT coordinator what the school's filtering and monitoring policies and procedures are.

Purple Ruler tutors will ensure to share any learning materials via share screen, learning space whiteboard or selected links that have been tested and approved by the DPO. Tutors will ensure that there are no harmful or inappropriate materials or information when sharing their screen. Tutors will not ask learners to independently search for anything via the search engine.

<https://purpleruler.larksuite.com/minutes/obusnn83a8342y3m6a6talix>

## 14. Safeguarding policy Updates

1. The Designated Safeguarding Lead will conduct an evaluation of the effectiveness of the safeguarding policies annually and update the policy accordingly from the findings with improvements.
2. Before delivering services to a new LEA, the Designated Safeguarding Lead will undertake localised Safeguarding training (in this case, Bristol) and update all Safeguarding Policies accordingly.
3. The policy will also be updated annually following any updates made to the KCSIE guidances.
4. This will be sent out to all shareholders including management team, facilitators, partnered schools or parents where applicable after any updates.