



Safeguarding policy

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Section 1: Introduction

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Key resources:

Keeping Children Safe in Education: <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

Child Protection guidance: <http://www.nspcc.org.uk/preventing-abuse/child-protection-system/england/>

Prevent Duty guidance: <https://www.gov.uk/government/publications/prevent-duty-guidance>

1.1 Introduction:

Tiro is committed to the safeguarding and well-being of all of our learners, staff and customers; we fully recognise our responsibilities for protecting vulnerable groups. Our policy applies to all staff, learners, contractors, visitors and anyone working on behalf of or in conjunction with Tiro Training Ltd. It is the policy of Tiro to promote the safety, health and well-being of all children, young people and adults at risk that the organisation works with – both directly and indirectly. We respect, value and listen to everyone as an individual.

1.1.1 Tiro commits to do this through:

- Training
- Staff meetings and peer coaching
- Recruitment
- Reporting
- Reviewing
- Engaging
- Investigation

1.1.2 At Tiro we believe in:

- Working to ensure children, young people and adults at risk are safeguarded from abuse of any kind. We strive to support the welfare of everyone around us and work with each other to promote safe practices to help our learners, staff, and other stakeholders keep themselves safe and exercise due care for those around them.

1.1.3 Tiro will achieve this by:

- Raising awareness of safeguarding throughout the organisation and ensuring that staff are equipped with the appropriate skills and knowledge to support children, young people and adults at risk effectively and help to keep them safe.
- Raising awareness of safeguarding to all of our learners and ensuring that the learners who are most vulnerable are equipped with the skills and knowledge needed to keep them safe.
- Implementing procedures for identifying and reporting disclosures, incidents, or concerns.
- Establishing safe environments in which at-risk groups can learn and develop.
- We recognise that because of the day-to-day contact with learners their welfare is paramount in all the work we do and in all the decisions we take. Everyone, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation have an equal right to protection from all types of harm or abuse, and our staff are well placed to observe the outward signs of abuse.

1.1.4 Staff at Tiro will therefore:

- Establish and maintain an environment where learners feel secure, are encouraged to talk and are listened to.
- Include opportunities within our ongoing assessment and review process for learners to develop the skills they need to recognise and stay safe from any safeguarding issues.

1.1.5 Tiro recognises and adheres to the statutory requirements within the following important and relevant pieces of safeguarding legislation:

- Keeping Children Safe in Education (2023)
- Working Together to Safeguard Children (2018)
- Counter-Terrorism and Security Act (2015)
- “Duty of Care” as defined in the Children Act (1989)
- Education Act (2002, 2011)
- Children’s Act (1989, 2004)
- Safeguarding Children and Safer Recruitment in Education (2007)
- Safeguarding Vulnerable Groups Act SVGA (2006 amended 2012)
- Protection of Freedoms Act (2012)
- Disclosure and Barring Service Code of Practice (2012)
- Sexual Offences Act (2003)
- Every Child Matters (2003)
- Equality Act (2010)
- Female Genital Mutilation Act (2003)
- Apprenticeships, Skills, Children and Learning Act (2009)
- Children and Families Act (2014)

1.1.6 We adhere to good practice with guidance outlined by the NSPCC.

1.1.7 To support our commitment to the safeguarding and well-being of all of our learners and with regard to the above legislation we will:

- Ensure that we have a Designated Safeguarding Lead, appointed by the Board of Governors, who has received appropriate training and support for this role.
- Ensure we have a Local Authority Designated link person – identified above.

1.1.8 Ensure that all staff through induction and training are aware and understand their responsibilities in relation to Safeguarding and in being alert to the signs and indicators of any form of abuse and for referring any concerns directly to the Designated Person for safeguarding.

1.1.9 All staff are to be inducted and trained on Tiro Safeguarding policy and procedures. This induction training will be revisited and reviewed every year.

1.1.10 Tiro will:

- Ensure that effective Safeguarding procedures are developed, implemented and monitored to ensure their effectiveness. These procedures are based on the 5Rs approach of Recognise, Respond, Record, Report, Refer.
- Ensure the Safeguarding Policy and Procedures are in place and kept up to date.
- Ensure Safeguarding details are easily accessible to learners, employers and staff.
- Ensure that we develop effective links with relevant external agencies, local safeguarding boards and co-operate with any requirements with any safeguarding referral matters.
- Ensure that we keep written records of safeguarding concerns, even when there is no need to refer the matter to the relevant agencies.
- Ensure all records are stored securely and in accordance with GDPR.

1.1.11 Tiro Training Ltd recognises its responsibility with regard to the safeguarding of young and vulnerable learners from any form of abuse and from inappropriate and inadequate care and is committed to responding in all cases where there is concern. Due to the nature of our work Tiro Training Ltd may be in the frontline of work with some children, young learners, and at-risk adults. This may mean that we are the first to know that a child, young person, or adult is at risk of or being abused or that we are concerned about a person's well-being. Everyone has an equal responsibility to ensure that the individual needs and welfare of the person are put first and to safeguard any person with whom we may come into contact.

1.1.12 We will ensure that our Safeguarding Policy and Procedures are reviewed at least annually to ensure that they are still relevant and effective.

Section 2: Governance

Tiro's Board of Governors have overall responsibility for Safeguarding the welfare of Tiro's learners.

2.1 Tiro's Board of Governors will:

2.1.1 Take strategic leadership responsibility for Tiro's safeguarding arrangements and ensure that Tiro complies with their legal duties under legislation.

2.1.2 Ensure that Tiro's Safeguarding Policy and Procedures are reviewed at least annually to ensure that they are effective.

2.1.3 Approve the appointment of Tiro's Designated Safeguarding Lead/s, who take lead responsibility for safeguarding and child protection (including online safety).

2.1.4 Take action to satisfy themselves that Safeguarding incidents are handled effectively and with the best interests of the child, young person, or vulnerable adult at heart.

2.1.5 Ensure all Board members have received adequate Safeguarding training and read Part 1 of Keeping Children Safe in Education (as a minimum requirement).

2.2 Tiro's Board of Governors has:

2.2.1 Delegated the day-to-day responsibilities of Safeguarding learners to the Executive Committee. They are required to provide an update to the Board on Safeguarding cases on a quarterly basis.

2.2.2 Appointed a Board Member as a Designated Safeguarding Lead (DSL) who is responsible for ensuring Tiro's Safeguarding policies, procedures and training are effective and comply with the law at all times.

2.2 Tiro's Executive Committee will:

2.2.1 Lead Tiro's day-to-day Safeguarding responsibilities, including response to Safeguarding cases, monitoring of trends, and effective and timely reporting of Safeguarding matters to the Board.

2.2.3 Ensure that all staff have received adequate safeguarding training, appropriate to their role, including reading part 1 of Keeping Children Safe in Education (as a minimum requirement).

2.2.4 Update Tiro's Safeguarding policies, processes, and training in line with the latest statutory guidance, for approval by the Board.

Section 3: Safeguarding overview

3.1 What is Safeguarding?

Safeguarding is a proactive process of protecting and ensuring the safety and well-being of young and at-risk learners. Safeguarding may involve instances in which a young or at-risk learner is suffering or likely to suffer from harm. Safeguarding involves adopting safer recruitment practices to assist in identifying persons who are unsuitable to work with young or vulnerable learners.

3.2 What are the benefits of effective Safeguarding?

3.2.1 Benefits of safeguarding:

- When learners feel safe and secure, they can concentrate on learning.
- Learners that are safe from abuse and/or neglect are empowered to develop in a healthy way.
- Learners that are made aware of forms of abuse/neglect may be empowered to keep themselves and others safe from abuse and/or neglect.
- Learners can rely on those people in positions of trust.
- Staff are protected from malicious and misplaced allegations.
- Staff are clear about individual responsibilities, roles, and boundaries.
- Learners are appropriately protected, and all issues are dealt with effectively.
- Clear 'whistleblowing' procedures are in place to raise concerns and report on any wrongdoing perpetrated by an employee at Tiro.

3.2.2 Definition and types of Safeguarding Concerns

This section closely reflects the most recent guidance, at the time of writing, outlined in Keeping Children Safe in Education (2023) (KCSIE, 2023).

Abuse is defined as a type of mistreatment towards a child, encompassing both direct harm inflicted or neglectful actions that fail to prevent harm. It extends beyond physical harm to include emotional or psychological distress resulting from witnessing mistreatment. This is especially pertinent in cases of domestic abuse, where children are significantly affected. Abuse can occur within families, institutions, or communities, perpetrated by individuals known to the child or, less commonly, by strangers. It can manifest solely online or involve technology to facilitate offline abuse. Perpetrators may be adults, other children, or a combination thereof.

Abuse and neglect are multifaceted phenomena. Tiro recognises that cases should be dealt with individually and often do not fit neatly into the definitions below and that cases can often feature multiple different forms of neglect/abuse. KCSIE (2023) identifies and defines 4 primary forms of abuse/neglect (pp. 10-11):

- Physical abuse.
- Emotional abuse.
- Sexual abuse.
- Neglect

3.2.2.1 Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness.

3.2.2.2 Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a person such as to cause severe and persistent adverse effects on their development. It may involve conveying to the person that they are worthless or unloved, inadequate, or valued only in so far as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed in them.

These may include interactions that are beyond the person's developmental capacity, as well as overprotection and limitation of exploration and learning, or preventing them participating in normal social interactions. It may involve serious bullying causing the person frequently to feel frightened or in danger, or the exploitation or corruption of persons. Some level of emotional abuse is involved in all types of maltreatment of a person, though it may occur alone. This also includes include E-safety.

3.2.2.3 Sexual Abuse

Sexual abuse involves forcing or enticing a person to take part in sexual activities, including prostitution, whether or not the person is aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. They may include non-contact activities, such as involving them in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging sexually inappropriate behaviour.

3.2.2.4 Neglect

Neglect involves the persistent failure to meet a person's basic or physical and/or psychological needs, likely to result in the serious impairment of the person's health and development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food and clothing, shelter including exclusion from home or abandonment, failing to protect a person from physical harm or danger, failure to ensure adequate supervision including the use of inadequate caretakers, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsive to, a person's basic emotional needs.

Additional safeguarding concerns and unsafe activities which we recognise, and which have become more prevalent in recent times are:

- Bullying and Harassment
- Sexting
- Discriminatory Abuse
- Financial Abuse
- Grooming
- Domestic Violence Alcohol and Drugs
- Online abuse
- Crime
- Cyber-bullying

3.2.2.5 Extremism and Radicalisation

3.2.5.1 Extremism is 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. Calls for the death of British armed forces are also included.

3.2.5.2 Radicalisation is the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

3.2.5.3 Terrorism is an action that endangers or causes serious violence damage or disruption and is intended to influence the Government or to intimidate the public and is made with the intention of advancing a political, religious, or ideological cause.

3.2.5.4 Vulnerability describes factors and characteristics associated with being susceptible to radicalisation.

3.2.6 Signs and Indicators of Possible Abuse

When considering whether there is enough information and evidence to suggest a young or at-risk learner has been abused, there are a number of possible indicators. However, there may also be a perfectly reasonable explanation, so it is important to remain vigilant but not be overzealous nor jump to conclusions. There may also be no signs or indicators of abuse, however this does not necessarily mean that a report of abuse is false.

3.2.6.1 Signs Suggesting Physical Abuse

Signs suggesting Physical Abuse may include but are not limited to:

- Any injuries not consistent with the explanation given for them.
- Injuries that have occurred on parts of the body which are unusual and not indicative of a fall or because of playing a contact / rough sport etc.
- Injuries that have not received medical attention.
- Neglect – under nourishment, failure to grow, constant hunger, stealing or gorging food, untreated illnesses, unkempt appearance, dirty clothes etc.
- Changes in routine.

3.2.6.2 Signs Suggesting Sexual Abuse

Signs suggesting Sexual Abuse may include but are not limited to:

- Any sexual allegation made by an individual.
- Individuals with an excessive preoccupation with sexual matters and detailed knowledge of adult sexual behaviour.
- Sexual activity through words, play or drawing.
- Individuals who are sexually provocative or seductive.
- Severe sleeping disorders.
- Eating disorders.

3.2.6.3 Signs Suggesting Emotional Abuse

Signs suggesting Emotional Abuse may include but are not limited to:

- Changes or regressions in mood or behaviour.
- Nervousness.
- Obsessions or phobias.
- Sudden under-achievement or lack of concentration.
- Attention seeking behaviour.
- Persistent tiredness.

3.2.6.4 Signs Suggesting Radicalisation

Signs suggesting Radicalisation may include but are not limited to:

- Direct opposition to British Values
- Use of inappropriate language (especially language associated with extremist-ideologies). Possession of extremist literature.
- Sudden unexpected behavioural changes.
- The expression of extremist views.
- Advocating violent actions and means.
- Change in social circles, including association with known extremists.
- Seeking to recruit others to an extremist ideology.
- Visiting known extremist sites on the internet, including groups on social media.
- Possession/display of extremist insignia/symbols.
- Veneration of known terrorists.
- Drastic changes in appearance / body art.

3.3 Safer Recruitment

Tiro Training Ltd will take all possible steps to prevent unsuitable persons working with young or at-risk learners and in doing so will follow the good practice contained within the legislative document Safeguarding Children and Safer Recruitment in Education (2019)

3.3.1 When interviewing potential staff, we will ensure that:

- There is an open recruitment process.
- There is a rigorous interview with specific questions relating to Safeguarding.
- Applicant identity and claims to academic or vocational qualifications will be verified.
- References will be taken up by direct contact with referees.
- Evidence of the date of birth and address of the applicant will be obtained.
- Where appropriate, an Enhanced Disclosure and Barring Service Check will be conducted.
- Where a position requires an Enhanced DBS check this will be made clear on the job advert.

3.3.2 During interviews the panel will explore:

- The applicant's ability to support our commitment to safeguarding and promoting the welfare of young or vulnerable learners.
- Any gaps in the applicant's employment history.
- Any concerns or discrepancies arising from the information obtained.

3.3.3 Post Appointment

3.3.3.1 All staff will take part in an induction programme which will vary dependent on the nature of the role. The purpose of this will be to:

- Ensure individuals receive Safeguard training.
- Ensure that individuals are aware of reporting concerns and who the Designated Persons for Safeguarding are.
- Ensure that individuals are aware of other relevant policies and procedures, i.e. disciplinary procedure, E&D Policy, and how to handle a Safeguarding disclosure.
- Provide support for the role in which they have been engaged.
- Provide opportunities for a new member of staff to ask questions or discuss concerns relating to their role or responsibilities.

- Enable individual line managers and colleagues to recognise any concerns about the person's ability or suitability from the outset and address them if deemed appropriate.

Section 4: Tiro's Safeguarding Process

4.1 How does Tiro deal with Safeguarding cases?

Tiro employs the 5 R's approach to Safeguarding. The 5 R's approach is a simple step-by-step process that includes:

- Recognising is the first step in Safeguarding. It involves being able to identify signs and indicators of potential harm, abuse, or neglect.
- Responding appropriately involves taking immediate action to ensure the safety and well-being of the individual at risk.
- Reporting a Safeguarding incident will typically involve a staff member reporting an incident/concern to Tiro's Designated Safeguarding Lead/s, who will advise on the most appropriate course of action.
- Recording information is vital to ensuring a case is managed appropriately and effectively. This includes information that may be referred to third parties and/or used in subsequent investigations or legal proceedings.
- Referring involves making appropriate arrangements for further support, investigation, or intervention by referring the case to relevant agencies or professionals. This step ensures that the necessary expertise and resources are brought in to address the safeguarding concerns effectively.

4.1.1. To Recognise effectively:

4.1.1.1 All Tiro staff receive training that defines the different types of abuse/neglect that learners may face.

4.1.1.2 All Tiro staff are trained in spotting the signs that suggest abuse and/or neglect may be taking place, including the unique challenges posed by Tiro's predominantly online approach to learning.

4.1.2. To Respond effectively:

4.1.2.1 All Tiro staff receive training in how to respond effectively to a disclosure from a learner. This includes:

- Listen carefully to them, and not directly question them.
- Give them time and attention.
- Allow the person to give a spontaneous account; do not stop a person who is freely recalling significant events.
- Explain that they cannot promise not to speak to others about the information they have shared.
- Contact the DSL directly and/or make a report using the Safeguarding Concern form, using the learner's own words as far as possible.

4.1.2.2 Reassure the person:

- That you are glad that they have told you.
- That they have not done anything wrong.
- Explain what you are going to do next.
- Explain that help will need to be sought if needed to keep them safe.

4.1.3 To Record effectively:

4.1.3.1 Tiro has a simple procedure for recording Safeguarding concerns on its Information Management System, Salesforce.

4.1.3.2 All staff receive training in how to record Safeguarding concerns on Salesforce.

4.1.3.3 All staff are trained to ensure they record verbatim what the learner has disclosed, using the learner's own words rather than their own interpretation of events.

4.1.4 To Report effectively:

4.1.4.1 Tiro has made sure that the process of reporting Safeguarding concerns is kept very simple. All concerns reported on Salesforce automatically notify the Designated Safeguarding Lead/s. Staff may also contact the Designated Safeguarding Lead directly via their mobile, telephone, email, or on Microsoft Teams.

4.1.4.2 If the Designated Safeguarding Lead/s is on annual leave, they will ensure appropriate cover is provided by another trained member of staff and that this is communicated to all staff.

4.1.5 To Refer effectively:

4.1.5.1 Tiro's Designated Safeguarding Leads are well connected with a wide range of third party agencies to refer cases onto.

4.1.5.2 Tiro run training annually for staff on how to refer cases themselves. In the event a staff member at Tiro disagrees with the action taken by the Designated Safeguarding Lead, Tiro staff should feel empowered and know how to refer a case effectively.

4.1.5.3 Tiro recognise that despite its commitments to General Data Protection Regulation, this should not stand in the way of information being shared to third parties appropriately, in order to protect the welfare of learners.

4.2 Procedure for Dealing with Allegations against Staff

4.2.1 This applies should anyone have concerns regarding inappropriate behaviour by a member of staff where they have:

- Behaved inappropriately in a way that has harmed or may have harmed a learner.
- Possibly committed a criminal offence against or related to learner.
- Behaved towards a learner in a way that indicates he/she is unsuitable to work with them.

4.2.1 The Designated Person for safeguarding should be informed of the matter immediately. (Where the designated Person nominated for safeguarding is involved in the allegation, the most senior member of staff should be informed). If the most senior member of staff is involved, then the Local Authority Safeguarding Lead should be contacted.

2.4.3 An investigation will take place which:

- Will determine if the police need to be involved immediately to protect the person further.
- Will record all details received and secure them safely.
- Will ensure the alleged member of staff is fully conversant of the allegation, is supported where relevant and free from victimisation.

- Will determine whether suspension is appropriate whilst undertaking the investigation.

All allegations will be acted upon, however due to the variance in the risk levels, all allegations will be treated individually, and the appropriate actions assigned on a case-by-case basis. The member of staff who has had an allegation made against them will be suspended pending the safeguarding investigation.

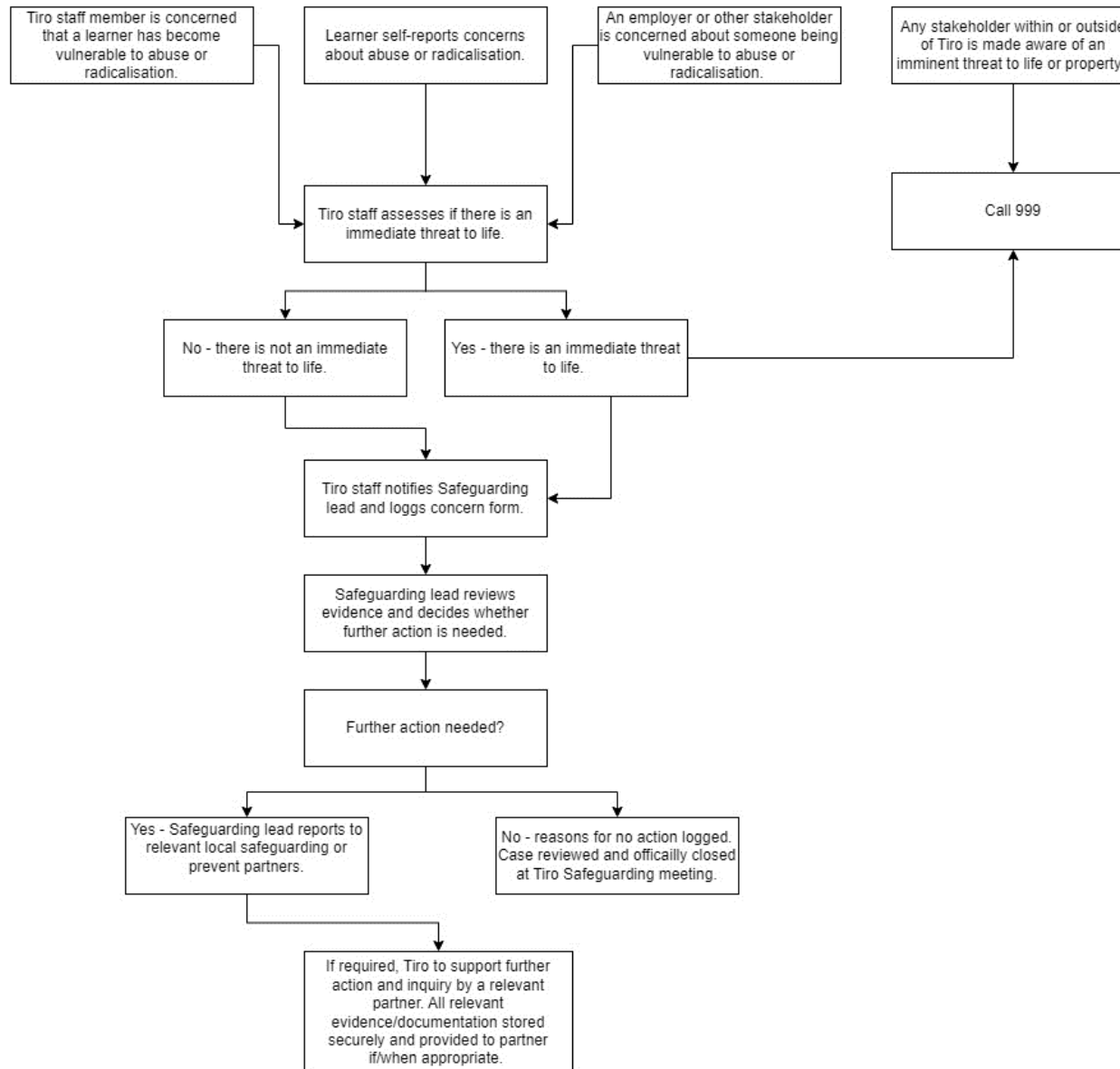
2.4.5 Anonymous Allegations

Concerns raised anonymously tend to be far less effective, and depending on the level of information, the matter may not be investigated at all.

The decision taken to investigate the matter further will depend upon:

- The seriousness of the matter
- Whether the concern is believable
- Whether an investigation can be carried out on the information provided

4.3 Safeguarding procedure flowchart



Appendix A - Change Control Log

Version	Details of amendments/ change	Author	Formal approval required	Approved by	Date of approval	Date adopted by the Board
V1	N/A	Carla Stuthridge, Safeguarding Lead	Y	Charlotte Blant, CEO	December, 2021	December, 2021
V1.1	Updated DSL details. Updated references at top of page 3. Changed reference of 'vulnerable' to 'at risk' Updated procedure for logging a disclosure in 2.3.3.2	Kate Balding, Director of Learning and Designated Safeguarding Lead	Y	Operational Committee	October, 2023	November 2023

	Updated procedure flow chart in 2.5					
V2	Updated DSL list. Updated Key Resources. Revised structure and sections. Removal of irrelevant/out of date legislation. Updated to be more in line with KCSIE. Added section summarising governance (section 2). Revised/added new section 4 on safeguarding procedures, in line with 5R's approach.	Benn Chacksfield, Sales Director, Designated Safeguarding Lead.	Y	Tiro Board of Governors	May 2024	May 2024
V3	Updated DSL list and contact details	Benn Chacksfield, Director of Higher Education and Partnerships	Y	TIRO Designated Safeguarding Lead	May 2025	NA