

# SPARK ACADEMY

# SAFEGUARDING POLICY

## Spark Academy Safeguarding Policy

Last Reviewed: February 2026

Next Review: February 2027

### Purpose

The purpose of this document is to affirm Spark Academy Tutoring's commitment to providing a safe, supportive, and positive learning environment for all children and young people who engage with our services. It also sets out clear guidance for staff, tutors and stakeholders, outlining their responsibilities in safeguarding learners and promoting their wellbeing at all times.

### Safeguarding Mission Statement

Spark Academy Tutoring is fully committed to promoting the safety, welfare, and well-being of all children and young people who engage in tuition through our platform. We believe that every child has the right to learn in a safe, supportive, and respectful environment, free from harm, abuse, or neglect.

Safeguarding is a core value at Spark Academy Tutoring. We take all reasonable steps to ensure that freelance tutors working with us understand and uphold high standards of professional conduct and child protection. We actively promote safeguarding awareness, safe working practices, and a culture of vigilance in all tuition arrangements.

We recognise that safeguarding is a shared responsibility. Spark Academy Tutoring works in partnership with parents and guardians, as well as with local authorities and partner schools, to support effective safeguarding practices and to ensure that concerns are identified, reported, and addressed appropriately.

While freelance tutors are not employed directly by Spark Academy Tutoring, we expect all tutors to act in the best interests of the children they support and to adhere to safeguarding principles at all times.

This policy statement should be read alongside other Spark Academy policies. Spark Academy Tutoring is committed to ensuring that this policy remains up to date and is reviewed and updated accordingly to reflect current legislation, statutory guidance, and best practice.



## Definitions and Key Concepts

Safeguarding refers to the proactive steps taken by an organisation to protect and promote the welfare, safety and wellbeing of children and vulnerable adults. This includes establishing preventative measures, clear procedures, and a culture of good practice that reduces the risk of harm. Child and adult protection, in contrast, relates to the actions taken when there are specific concerns or incidents that suggest a child or vulnerable adult may be at risk of harm or abuse.

This document is written in line with the principles and statutory guidance set out in Keeping Children Safe in Education (2025) and Working Together to Safeguard Children (2023), ensuring that safeguarding responsibilities, reporting procedures, and multi-agency working reflect current legal requirements and recognised best practice.

### Definition of a Child

A child is defined as any individual under the age of 18, in accordance with the United Nations Convention on the Rights of the Child.

### Definition of a Vulnerable Adult

A vulnerable adult is a person aged 18 or over who may require additional support to care for themselves or to safeguard themselves from harm, abuse, or exploitation. This may include individuals who:

- Are older and living with frailty
- Experience mental health conditions, including dementia
- Have physical or sensory impairments
- Have learning disabilities
- Live with serious or long-term physical illness
- Are affected by substance misuse
- Are experiencing homelessness

### Types of Abuse

Abuse can take many forms and may affect children or vulnerable adults in different ways. The main categories of abuse include:

- Physical abuse – causing physical harm through actions such as hitting, shaking, burning, or poisoning
- Emotional abuse – persistent behaviour that harms a person's emotional wellbeing or sense of self-worth
- Sexual abuse – involving a child or vulnerable adult in sexual activities without consent or understanding
- Neglect – the ongoing failure to meet basic physical and emotional needs
- Financial abuse – the misuse or theft of money, property, or personal assets
- Discriminatory abuse – abuse based on factors such as age, disability, gender, race, religion, or sexual orientation
- Domestic abuse – controlling, coercive, threatening, or violent behaviour between individuals in a personal relationship

For further detailed information on the signs, indicators, and definitions of abuse, please refer to the guidance available on the NSPCC website.

<https://www.nspcc.org.uk>

## Responsibilities

### Designated Safeguarding Lead (DSL) and Deputy DSL

The Designated Safeguarding Lead (DSL), supported by the Deputy DSL, takes overall responsibility for safeguarding and child protection at Spark Academy Tutoring.

#### The DSL/Deputy DSL will:

- Take the lead in developing, reviewing, and implementing Spark Academy Tutoring's safeguarding and child protection policies and procedures.
- Ensure that safeguarding concerns relating to children and young people receiving tuition are responded to promptly, appropriately, and in line with statutory guidance.
- Ensure that children, parents/carers, tutors, and staff know who they can speak to if they have a safeguarding or welfare concern and understand how Spark Academy Tutoring will respond.
- Receive, record, and securely store information about safeguarding concerns raised by tutors, parents, carers, or others.
- Take the lead in responding to safeguarding concerns, including concerns that a tutor or adult associated with Spark Academy Tutoring may pose a risk to a child or young person.

#### This includes:

- Assessing and clarifying safeguarding information received
- Making referrals to statutory agencies where required
- Ensuring actions are taken in line with safeguarding policies and procedures

### Working with External Agencies

#### The DSL/Deputy DSL will:

Liaise with and share information appropriately with statutory safeguarding agencies, including:

- Local Authority Children's Social Care
- The Police
- The Local Authority Designated Officer (LADO), where allegations involve adults working with children
- Make formal referrals to external agencies when safeguarding thresholds are met.
- Seek advice and guidance from the **NSPCC Helpline when required (0808 800 5000 or [help@nspcc.org.uk](mailto:help@nspcc.org.uk))**.

### Record Keeping and Oversight

#### The DSL/Deputy DSL will:

- Ensure safeguarding and child protection records are stored securely and retained in line with legal requirements and Spark Academy Tutoring's safeguarding policy.
- Monitor safeguarding practices to ensure policies and procedures are consistently followed.

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### Training and Professional Development The DSL/Deputy DSL will:

- Be familiar with and work within local inter-agency safeguarding and child protection procedures.
- Keep up to date with current safeguarding legislation, guidance, and best practice.
- Attend regular safeguarding and child protection training.
- Share relevant safeguarding knowledge and updates with tutors and others working with children through Spark Academy Tutoring.
- Attend supervision, team meetings, and management meetings as required.
- Carry out duties flexibly and undertake any additional reasonable safeguarding-related responsibilities as necessary.

If the Designated Safeguarding Lead (DSL) is unavailable, any safeguarding concerns must be reported immediately to the Deputy Designated Safeguarding Lead (Deputy DSL). The Deputy DSL will take appropriate action in line with Spark Academy Tutoring's safeguarding procedures and the protocols established by the DSL. The responsibilities of the Deputy DSL mirror those of the DSL; however, where possible, the DSL should always be the first point of contact for safeguarding concerns.



**Becky Ingram**  
Director and Designated  
Safeguarding Lead  
contact@sparkacademytutoring.com  
01226899567



**Karen Kowalski**  
HR Compliance and Deputy  
Designated  
Safeguarding Lead  
admin@sparkacademytutoring.com  
01226899567

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## Recruitment

- Spark Academy Tutoring is committed to safer recruitment practices and ensuring that all tutors engaged to deliver tuition have undergone appropriate pre-engagement checks prior to commencing work.  
Pre-Engagement Checks
- All tutors are subject to a robust vetting process designed to assess their suitability to work with children and young people. This process includes:
  - A formal interview to assess professional suitability, safeguarding awareness, and professional conduct.
  - The receipt and verification of two professional references prior to the tutor beginning work.
  - Verification of identity through valid photographic identification (such as a passport or driving licence).
  - Confirmation of right to work in the UK and proof of current address. This includes appropriate right to work documentation: a council tax bill or utility bill dated within the last three months.
- Verification of the tutor's National Insurance number via official documentation (e.g., payslip or HMRC record).
- Tutors will not commence tuition until all required checks have been satisfactorily completed and reviewed.

## Disclosure and Barring Service (DBS) Checks

- All tutors are required to hold an appropriate Disclosure and Barring Service (DBS) check.
- DBS certificates must be dated within the last three years, or tutors must be registered with the DBS Update Service, with a current status check carried out and recorded.
- Tutors delivering EOTAS (Education Otherwise Than at School) or Alternative Provision must hold an enhanced DBS check that includes a Children's Barred List check.
- Copies of DBS certificates and/or update service status checks are securely recorded and may be shared with commissioning local authorities or partner schools upon request.
- Spark Academy Tutoring maintains secure records of all vetting checks in accordance with data protection and safeguarding requirements.

**For further details, please refer to the Safer Recruitment Policy.**

## Staff Training

Spark Academy Tutoring is committed to ensuring that all tutors and staff are appropriately informed, trained, and supported to safeguard children effectively.

All tutors and relevant staff are provided with the most current version of Keeping Children Safe in Education (KCSIE) and are required to confirm, via email, that they have read and understood the document. This confirmation is recorded as part of our safeguarding compliance procedures.

In addition to KCSIE, tutors are provided with supporting safeguarding guidance documents to strengthen their knowledge and practical understanding. These include clear guidance on:

- Responding to a disclosure from a child
- Recognising the different types of maltreatment and abuse
- Reporting safeguarding concerns in line with Spark Academy Tutoring procedures
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Tutors are expected to familiarise themselves with these materials prior to commencing tuition and to apply this knowledge in their professional practice. Spark Academy Tutoring promotes a culture of vigilance and encourages tutors to seek advice or clarification from the Designated Safeguarding Lead where required.

Safeguarding knowledge and expectations are reinforced through ongoing communication, policy updates, and procedural guidance to ensure continuous improvement and alignment with current statutory guidance.

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## Responsibilities

### Tutors

All tutors working with Spark Academy Tutoring are expected to uphold the highest standards of safeguarding and professional conduct. Tutors must:

- Work in partnership with parents, carers and students to promote the safety and wellbeing of every child.
- Maintain a professional, safe and respectful learning environment during all tuition sessions.
- Not continue a lesson if no parent or legal guardian is present and either the tutor or student feels uncomfortable proceeding.

### Reporting Safeguarding Concerns

Tutors have a duty to report immediately any safeguarding concerns, including worries, suspicions or disclosures relating to abuse, neglect, exploitation or inappropriate behaviour. Concerns must be reported to:

- Becky Ingram – Designated Safeguarding Lead (DSL)
- Karen Kowalski – Deputy Designated Safeguarding Lead (Deputy DSL)

The DSL will assess the concern and determine whether a referral to child protection services or other relevant safeguarding agencies is required.

### Tutors must:

- Follow the guidance provided by the DSL.
- Record concerns factually and promptly using the safeguarding referral form.
- Cooperate fully with any safeguarding enquiries, investigations or actions required by the DSL or external safeguarding authorities.

To support tutors in fulfilling these responsibilities, Spark Academy Tutoring provides clear safeguarding guidance, including procedures for responding to disclosures and recognising the signs and indicators of abuse and neglect.

This ensures tutors understand their role in protecting children and responding appropriately to safeguarding concerns.

In the event of an emergency where a child is at immediate risk of harm and the Designated Safeguarding Lead (DSL) and Deputy DSL are unavailable, tutors must take immediate action and report their concerns directly to the appropriate child protection agencies or contact the police on 999.

If, at any time, a tutor believes that making a direct referral to children's social care or another relevant safeguarding authority is in the best interests of the child, they are authorised to do so without delay, in line with statutory safeguarding guidance.

## Tutor Standards and Professional Conduct

At Spark Academy Tutoring, we recognise that every tutor plays a vital role in creating a safe, supportive, and positive learning environment. Tutors are expected to uphold our core values of compassion, integrity, excellence, inclusivity, and collaboration. This includes always prioritising the wellbeing of the child, delivering high-quality and well-prepared lessons, treating all learners with respect and fairness, and working constructively with families and the wider Spark Academy team to achieve the best outcomes for students.

All tutors must maintain professional conduct at all times. This includes using appropriate and respectful language, presenting themselves in a professional manner (both in person and online), maintaining confidentiality, adhering strictly to safeguarding procedures, and providing a safe and inclusive learning space free from discrimination or bullying. Tutors are expected to be reliable, punctual, and clear in their communication.

For further details, please refer to the Staff Conduct Policy.

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## Stakeholder Responsibilities

Safeguarding children and young people is a shared and collective responsibility. Spark Academy Tutoring is committed to working collaboratively with all stakeholders to ensure robust safeguarding arrangements that prioritise the safety, welfare, and best interests of children at all times.

## Parents, Guardians, and Carers

- Parents, guardians, and carers are recognised as primary safeguarding partners and are expected to:
- Take full and active responsibility for their child's safety, supervision, welfare, and emotional well-being during all tuition sessions arranged through Spark Academy Tutoring.
- Engage proactively with Spark Academy Tutoring to support effective safeguarding practice, including the timely sharing of relevant information that may impact a child's safety or well-being.
- Raise safeguarding or welfare concerns promptly and cooperate fully with any safeguarding actions or processes required.
- Parents, guardians, and carers are expected to ensure that a responsible adult is present within the home for the full duration of all tuition sessions, whether these sessions are delivered in person or online. This requirement is in place to support safeguarding best practice and to ensure appropriate supervision at all times.
- Where a parent or guardian feels comfortable for their child to remain in a tuition session without their presence, this is a parental decision. In such circumstances, a request may be made in writing to Spark Academy Tutoring. Any agreement to this arrangement will be considered on an individual basis.
- It is clearly understood that, even where such an arrangement is agreed, Spark Academy Tutoring does not assume responsibility or liability for the actions, conduct, or behaviour of freelance tutors during tuition sessions. Tutors remain responsible for their own professional conduct at all times, and the ultimate responsibility for the child's supervision and safeguarding continues to rest with the parent or guardian.
- Acknowledge that Spark Academy Tutoring facilitates safeguarding oversight and promotes best practice; however, the ultimate responsibility for the safeguarding, supervision, and welfare of the child during tuition sessions remains with the parent or guardian.
- Act in accordance with Spark Academy Tutoring's safeguarding policies, procedures, and expectations.



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### External Agencies and Statutory Bodies

- Spark Academy Tutoring recognises the critical role of external agencies in safeguarding and child protection and is committed to effective multi-agency working. This includes engagement with:
  - Local Authority Children's Social Care
  - Local Authority Designated Officers (LADO)
  - Health professionals
  - Police and other statutory safeguarding partners
- Where safeguarding concerns arise, Spark Academy Tutoring will cooperate fully with statutory agencies through appropriate information sharing, referrals, joint working, and coordinated responses, in line with statutory guidance and local safeguarding procedures.
- Partner Schools and Commissioning Bodies
- Spark Academy Tutoring works in partnership with local authorities, schools, and other commissioning bodies to ensure safeguarding arrangements are robust, transparent, and aligned with local safeguarding frameworks.

### Partner organisations are expected to:

- Support and uphold Spark Academy Tutoring's safeguarding principles and policies.
- Engage in effective communication and information sharing where safeguarding concerns are identified.
- Maintain appropriate confidentiality and data protection standards in relation to safeguarding information.
  - Confidentiality and Information Sharing
- All stakeholders are required to maintain the highest standards of confidentiality in safeguarding matters. Information will be shared appropriately and proportionately, on a need-to-know basis, and in accordance with safeguarding legislation, statutory guidance, and local authority requirements.

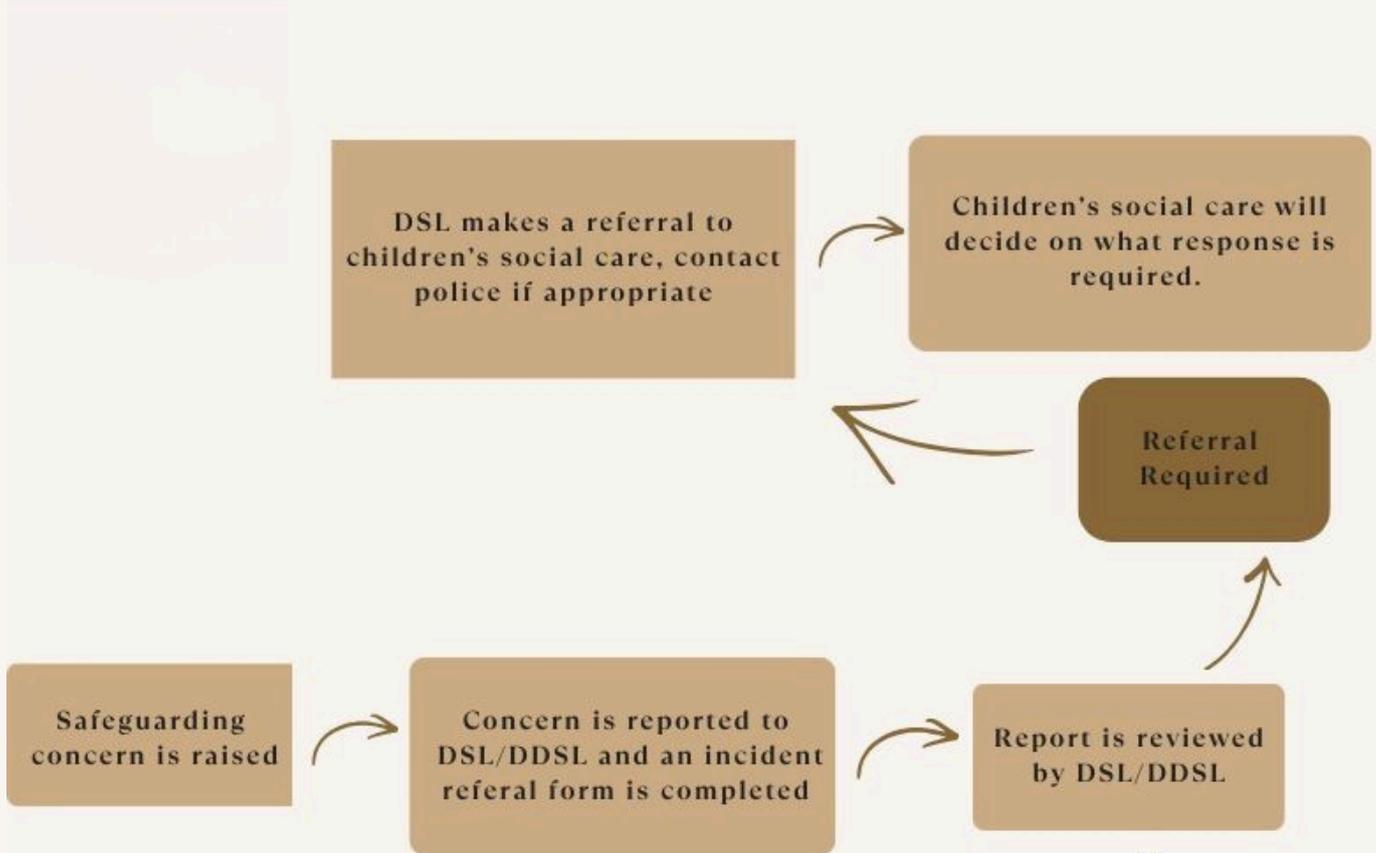
### Professional Standards and External Membership

Spark Academy Tutoring is an official member of The Tutors' Association. This membership reflects our commitment to upholding the highest professional, ethical, and safeguarding standards within education.

Our membership provides reassurance to families, partner schools, and local authorities that Spark Academy Tutoring operates transparently and responsibly, with safeguarding embedded at the core of our practice. We are committed to continuous professional development and ongoing review of our procedures to ensure they remain robust, compliant, and aligned with current guidance.

Through this commitment to professional excellence, we strive to provide a safe, trusted, and supportive learning environment in which every child can thrive.

# The process of reporting a concern



## SPARK ACADEMY SAFEGUARDING FLOW CHART

Designated Safeguarding Lead  
Becky Ingram  
contact@sparkacademytutoring.com  
01226899567

Deputy Safeguarding Lead  
Karen Kowalski  
admin@sparkacademytutoring.com  
01226899567

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## Supporting Children with Special Educational Needs and Disabilities (SEND)

Spark Academy Tutoring recognises that children with Special Educational Needs and Disabilities (SEND) may face additional barriers to learning and can be more vulnerable to safeguarding risks. We are committed to providing a safe, inclusive and responsive environment in which all students feel supported and able to thrive.

Our provision is delivered by fully qualified teachers with extensive SEND experience. Tutors adapt teaching approaches to meet a wide range of needs and ensure that safeguarding awareness underpins all support. Where external professionals are involved, we follow and implement guidance from specialists such as Speech and Language Therapists, Educational Psychologists and other relevant practitioners to ensure provision is aligned with identified needs.

We adopt a flexible and adaptive approach, responding promptly to changes in a student's presentation, engagement or wellbeing. Progress of vulnerable learners is continuously monitored, and support plans are reviewed and adjusted as necessary. We maintain clear and open communication with parents/carers to ensure they remain actively involved in monitoring progress and supporting outcomes.

For students accessing Education Other Than At School (EOTAS) or alternative provision, weekly feedback reports are completed outlining engagement, progress, clear targets and next steps. Where a child has an Education, Health and Care Plan (EHCP), provision is structured around the specified outcomes and progress towards these is regularly reviewed and communicated.

Spark Academy Tutoring is dedicated to creating a safe, inclusive and supportive learning environment. Our practice is guided by professional expertise, individualised attention and a strong commitment to ensuring that every student is safeguarded and supported to achieve their full potential.



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## Online Safety

Spark Academy Tutoring recognises that safeguarding responsibilities extend to all online learning environments. We are committed to ensuring that children and young people are protected from potential risks associated with digital platforms and that appropriate measures are in place to promote safe and responsible online engagement.

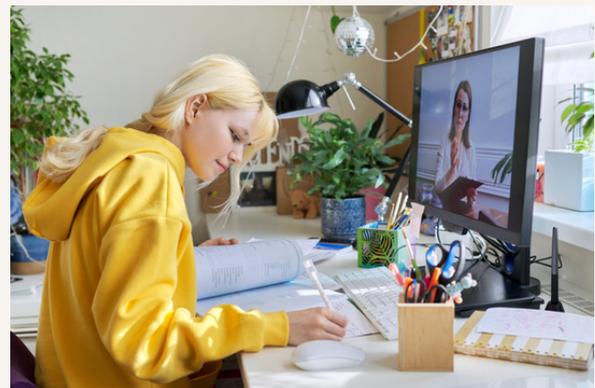
All tutoring sessions are delivered via approved secure platforms, including Zoom or Microsoft Teams. Access to lessons requires secure login details and/or password protection. Meeting links are shared directly with parents/carers and are not published publicly. Appropriate security features, such as waiting rooms where applicable, are utilised to prevent unauthorised access.

Students are supported to develop safe online behaviours. They are reminded to keep personal information private, not to share passwords, to communicate respectfully, and to exercise caution when interacting online. Online safety guidance is reinforced by tutors and supported through our "Staying Safe Online" poster, which is available on our website and issued to parents/carers at the point of enrolment.

All tutors understand their responsibility to maintain professional boundaries, use only approved communication channels, and report any online safety or safeguarding concerns immediately to the Designated Safeguarding Lead (DSL) in accordance with Spark Academy Tutoring's safeguarding procedures.

Spark Academy Tutoring remains committed to maintaining a culture of vigilance and proactive safeguarding within all online provision.

Please refer to the full Online Safety Policy for further details.



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## Physical Intervention and Behaviour Management

Spark Academy maintains a strict no physical intervention policy. Tutors must not use reasonable force or any form of physical contact to manage behaviour under any circumstances.

- Tutors must never physically intervene with a student or attempt to restrain them as a behaviour management strategy.
- Tutors must avoid any action that could be misinterpreted as physical punishment, force, or intimidation.
- Professional boundaries must be maintained at all times.
- If a child's behaviour becomes unacceptable, unsafe, or physically aggressive towards a tutor, the session must be ended immediately.

Any incident involving physical aggression, threatening behaviour, or unsafe conduct must be reported as soon as possible to:

- Becky Ingram, Designated Safeguarding Lead (DSL)
- Karen Kowalski, Deputy Designated Safeguarding Lead (Deputy DSL)

The parent or guardian must also be informed promptly in line with safeguarding procedures.

### Exceptional Circumstances – Immediate Risk to Life or Serious Harm

In the highly exceptional circumstance where there is an immediate and genuine threat to life, or a risk of serious harm to a student, parent/carer, or tutor, a tutor may act proportionately and appropriately to prevent injury.

In such emergency situations only:

- Physical intervention may be used solely to prevent immediate harm.
- Any action taken must be reasonable, proportionate, and the minimum necessary to reduce the risk.
- The intervention must cease as soon as the immediate danger has passed.
- Emergency services (999) must be contacted immediately.
- The incident must be reported without delay to Becky Ingram (DSL) or, in her absence, Karen Kowalski (Deputy DSL).
- A full written incident report must be completed as soon as possible following the event. Physical intervention must never be used as a disciplinary measure, a behaviour management strategy, or as a response to non-compliance. It is permitted only in emergency life-threatening situations where failure to act would likely result in serious injury. This approach ensures a safe and professional environment for both tutors and students and aligns with safeguarding best practice and child protection guidance.

For further details on our approach to behaviour please see our Behaviour policy.

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## **The Prevent Duty and Radicalisation**

Spark Academy Tutoring recognises its responsibility under section 26 of the Counter-Terrorism and Security Act 2015 (the Prevent duty) to have due regard to the need to prevent children and young people from being drawn into terrorism.

Some children may be vulnerable to extremist ideologies and radicalisation. Protecting children from these risks forms part of Spark Academy Tutoring's wider safeguarding responsibilities and is treated in the same way as protecting children from other forms of harm or abuse.

The Designated Safeguarding Lead (DSL) has overall responsibility for Spark Academy Tutoring's approach to the Prevent duty and for ensuring that concerns about radicalisation are identified, managed, and referred appropriately.

## **How Radicalisation Can Happen**

Radicalisation is often a gradual process and may not be obvious to the child or young person experiencing it. It can involve:

- Grooming online or in person
- Psychological manipulation
- Exploitation, including sexual exploitation
- Exposure to extremist or violent content
- Being encouraged to support or engage in extremist activity, which may place the child at risk of serious harm

## **Vulnerability Factors**

While anyone can be affected by radicalisation, some factors may increase a child or young person's vulnerability, including:

- Being easily influenced or impressionable
- Low self-esteem or social isolation
- Feeling excluded, discriminated against, or treated unfairly
- Exposure to community or social tensions
- Anger or hostility towards family members or peers
- A strong desire for acceptance, identity, or belonging
- Experiencing grief, loss, or significant emotional distress

These factors alone do not mean a child is being radicalised, but they may increase risk and should be considered alongside other concerns.

## **Possible Indicators of Radicalisation**

A child or young person who may be experiencing radicalisation could show changes in behaviour, such as:

- Spending increased time communicating with individuals or groups holding extreme views (online or offline)
- Changes in appearance, dress, or behaviour linked to an extremist ideology
- Withdrawal from friends or activities not associated with the ideology or group
- Possession of extremist materials or symbols
- Attempting to influence or recruit others to support an extremist cause

## **What to Do If You Are Concerned**

If you believe a child or others are at immediate risk of harm, contact the emergency services by calling 999.

If the situation is not an emergency, you must follow Spark Academy Tutoring's safeguarding reporting procedures:

- Report the concern immediately to the Designated Safeguarding Lead (DSL) or Deputy DSL in line with the "Reporting a Concern" section of this policy.
- If appropriate, the DSL will assess the concern and decide on next steps, which may include consultation with external agencies or referral through local safeguarding or Prevent pathways.

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## Child Sexual Exploitation (CSE)

Spark Academy Tutoring recognises that Child Sexual Exploitation (CSE) is a serious form of child abuse in which a child or young person is manipulated, coerced or forced into sexual activity in exchange for something such as money, gifts, affection, status or substances. CSE can affect any child, regardless of background, gender or circumstance, and can be extremely difficult to identify, as warning signs may be mistaken for typical adolescent behaviour.

Children who are being sexually exploited may display behavioural indicators such as inappropriate sexualised behaviour for their age, sudden changes in emotional wellbeing, increased secrecy, isolation from peers, unexplained money or gifts, association with older individuals or gangs, persistent lateness or absence from education, returning home under the influence of drugs or alcohol, going missing, involvement in petty crime, or spending time in locations of concern.

Physical indicators may include unexplained injuries, significant changes in appearance, self-harm, sexually transmitted infections, or pregnancy. Certain vulnerability factors may increase risk, including low self-esteem, social isolation, previous abuse, bereavement, homelessness, being in or leaving care, gang affiliation, or a lack of supportive peer networks. LGBTQ+ children may be at additional risk where they feel isolated or unsupported and seek connection online, potentially exposing them to exploitation.

Perpetrators of CSE may be individuals or groups, male or female, adults or other young people. They are often highly manipulative and may use emotional blackmail, violence, financial control, substances or peer pressure to exploit victims. Abuse may be a one-off incident or part of organised and repeated exploitation across different locations. Victims may not recognise that they are being abused and may know perpetrators only by aliases or limited identifying information.

Spark Academy Tutoring adopts a vigilant and preventative approach. All staff are expected to remain alert to the indicators of CSE and to act immediately on any concerns in line with our safeguarding procedures. If a child is believed to be in immediate danger, the police will be contacted on 999.

Where there are safeguarding concerns that do not present immediate risk, these will be reported to the Designated Safeguarding Lead (DSL), who will make appropriate referrals to local authority children's services or other relevant agencies. We recognise that victims are never to blame and that a supportive, child-centred approach must always be taken.

For further information and guidance on Child Sexual Exploitation, please refer to the NSPCC website.  
<https://www.nspcc.org.uk/keeping-children-safe/types-of-abuse/child-sexual-exploitation/>

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## Female Genital Mutilation (FGM)

Spark Academy Tutoring recognises that Female Genital Mutilation (FGM) is a form of child abuse and violence against women and girls. FGM comprises all procedures involving the partial or total removal of the external female genitalia, or other injury to the female genital organs, for non-medical reasons. It is illegal in the UK and is a serious safeguarding concern.

FGM is typically carried out on girls between infancy and the age of 15, most commonly between the ages of 5 and 8, although it can take place at any age. It may be performed in the UK or abroad and is often linked to cultural, religious or social pressures within families or communities. Spark Academy Tutoring understands that FGM is not a religious requirement and is recognised internationally as a violation of human rights.

### Possible Warning Signs

FGM can be difficult to identify. However, staff should remain alert to potential indicators, which may include:

Indicators that FGM may take place:

- A girl discussing a special ceremony, procedure, or extended holiday abroad (particularly to countries where FGM is prevalent).
  - Family members referring to "becoming a woman" or preparing for a significant cultural event.
  - Withdrawal from lessons or sudden behavioural changes.
  - A sibling or relative who has undergone FGM.
- Indicators that FGM may have already taken place:
- Prolonged absence from education, particularly following travel.
  - Difficulty sitting, standing, or walking comfortably.
  - Spending longer than usual in the bathroom.
  - Frequent urinary, menstrual or abdominal pain complaints.
  - Disclosure by the child or information shared by peers.

It is important to note that a child may not directly disclose FGM due to fear, loyalty to family, or lack of understanding.

### Our Commitment to Safeguarding

Spark Academy Tutoring adopts a zero-tolerance approach to FGM. All staff are expected to remain vigilant and to report any concerns immediately to the Designated Safeguarding Lead (DSL). We follow statutory safeguarding guidance and recognise our duty to act promptly and appropriately.

If a girl under 18 discloses that FGM has taken place, or if staff observe physical signs that appear to show FGM has been carried out, this will be treated as a mandatory reporting duty to the police, in addition to internal safeguarding procedures. In all other cases of concern, the DSL will make appropriate referrals to children's services and relevant agencies.

We are committed to a child-centred approach, ensuring that any child at risk is supported sensitively and without judgement. Safeguarding remains at the core of our practice, and we are dedicated to protecting all children and young people from harm.

For further information and guidance on FGM, please refer to the NSPCC website.

<https://www.nspcc.org.uk/keeping-children-safe/types-of-abuse/female-genital-mutilation-fgm/>

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## Local Authority Designated Officer (LADO)

### What is the LADO?

The Local Authority Designated Officer (LADO) is responsible for overseeing allegations and concerns about adults who work with, care for, or have contact with children. This includes allegations that an adult working with or on behalf of Spark Academy Tutoring may have:

- Behaved in a way that has harmed, or may have harmed, a child
- Possibly committed a criminal offence against a child
- Behaved towards a child or children in a way that indicates they may pose a risk of harm

The role of the LADO is to ensure that allegations are managed fairly, consistently, and in line with statutory safeguarding procedures.

### When a Referral to the LADO is Made

The Designated Safeguarding Lead (DSL) is responsible for deciding whether a concern meets the threshold for referral to the LADO.

If a concern involves the behaviour or conduct of an adult working with children through Spark Academy Tutoring and meets the required threshold, the DSL will:

- Make a referral to the LADO and/or Children's Social Care within 24 hours of the concern coming to the attention of the DSL or Deputy DSL
- Follow local authority procedures and guidance when making the referral
- Record all actions, decisions, and outcomes securely in line with safeguarding requirements

### How Spark Academy Tutoring Responds to LADO Concerns

- When a concern is referred to the LADO, Spark Academy Tutoring will:
- Cooperate fully with any safeguarding enquiries, investigations, or actions advised by the LADO
- Follow guidance provided by the LADO regarding next steps, which may include:
  - Referral to Children's Social Care
  - Involvement of the police
  - Internal safeguarding or disciplinary actions
- Take appropriate steps to safeguard children while an investigation is ongoing, which may include restricting or suspending a tutor's involvement in tuition where necessary
- Maintain confidentiality and share information only on a need-to-know basis

### Roles and Responsibilities

- The DSL remains the key point of contact with the LADO and relevant safeguarding agencies throughout the process.
- Tutors and others working with Spark Academy Tutoring are expected to:
  - Report concerns immediately to the DSL or Deputy DSL
- Cooperate fully with safeguarding investigations or actions recommended by the DSL, LADO, or other relevant authorities
- Maintain confidentiality and follow safeguarding procedures at all times
- All LADO-related concerns are treated seriously and managed in accordance with statutory guidance, local authority procedures, and Spark Academy Tutoring's safeguarding and child protection policies.

# SPARK ACADEMY SAFEGUARDING POLICY



## SPARK ACADEMY LADO REPORTING FLOW CHART



Designated Safeguarding Lead  
Becky Ingram  
contact@sparkacademytutoring.com  
01226899567

Deputy Safeguarding Lead  
Karen Kowalski  
admin@sparkacademytutoring.com  
01226899567

# SPARK ACADEMY SAFEGUARDING POLICY

## Commitment to Safeguarding and Partnership Working

Spark Academy Tutoring is fully committed to safeguarding and promoting the welfare of all children and young people who receive tuition through our services. We operate robust recruitment and vetting procedures and take all reasonable steps to ensure that tutors engaged through Spark Academy meet high standards of suitability, professionalism, and safeguarding awareness before commencing work.

Spark Academy acts as a facilitator of tuition services, connecting families with freelance tutors who operate on a self-employed basis. While tutors are responsible for their own professional conduct and actions during tuition sessions, Spark Academy works proactively in partnership with tutors, parents, guardians, partner schools, local authorities, and other stakeholders to promote safe and supportive learning environments. Through clear safeguarding procedures, open communication, and shared accountability, we aim to ensure that all students receiving tuition through Spark Academy Tutoring are effectively safeguarded.

We encourage parents and guardians to remain actively involved in their child's education and wellbeing and to communicate any concerns promptly. While Spark Academy does not assume direct responsibility for the independent actions of freelance tutors, we take all safeguarding concerns seriously and will respond appropriately in line with our safeguarding procedures and relevant statutory guidance.

Spark Academy Tutoring is committed to continuous improvement, striving for excellence by regularly reviewing and strengthening our safeguarding practices, staying informed of current safeguarding guidance and legislation, and responding proactively to emerging risks and changing circumstances.



# SPARK ACADEMY

# SAFEGUARDING POLICY

## Appendices

1.

### Safeguarding Referral form

#### Safeguarding Incident / Concern Referral Form

(KCSIE Aligned – Keeping Children Safe in Education)

##### Section 1 – Tutor Details

Tutor full name

Tutor contact email

Tutor contact phone number

Date of report

Time of report

##### Section 2 – Child / Young Person Details

Child / young person full name

Parent / carer name(s)

Parent / carer contact details

##### Section 3 – Nature of Safeguarding Concern (tick all that apply)

- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect
- Child-on-child abuse
- Online safety concern
- Mental health concern
- Domestic abuse
- Radicalisation / extremism
- Other

#### Safeguarding Incident / Concern Referral Form

(KCSIE Aligned – Keeping Children Safe in Education)

##### Section 4 – Details of the Concern (FACTUAL RECORD)

Record what you saw, heard, or were told. Use the child's own words. Do not investigate.

##### Section 5 – Actions Taken

What action did you take at the time?

##### Section 6 – Immediate Risk Assessment

Do you believe the child is at immediate risk of harm? (tick one)

- Yes
  No
  Unsure

Reason for your assessment

##### Signatures

Tutor signature

Date signed

# SPARK ACADEMY SAFEGUARDING POLICY

## Appendices

### 2. LADO Concern Form

| Spark Academy Tutoring                               |  |
|--|--|
| <b>LADO Concern Recording Form</b>                   |  |
| <b>Section 1: Person Completing This Form</b>        |  |
| Date Concern Reported                                |  |
| Time Concern Reported                                |  |
| Name   |  |
| Role   |  |
| Contact Details                                      |  |
| <b>Section 2: Child / Young Person Details</b>       |  |
| Child's Name   |  |
| Date of Birth  |  |
| School (if known)                                    |  |
| Parent / Carer Name(s)                               |  |
| Parent / Carer Contact Details                       |  |
| <b>Section 3: Adult the Concern Relates To</b>       |  |
| Name of Adult  |  |
| Role   |  |
| Organisation (if external)                           |  |
| Relationship to the Child                            |  |
| <b>Section 4: Nature of the Concern / Allegation</b> |  |
| Details of Concern                                   |  |
| <b>Section 5: How the Concern Came to Light</b>      |  |
| Source of Concern                                    |  |
| <b>Section 6: Immediate Risk and Actions Taken</b>   |  |
| Immediate risk?                                      |  |
| Emergency services contacted?                        |  |
| Actions taken  |  |
| <b>Section 7: DSL / Deputy DSL Actions</b>           |  |
| DSL / Deputy DSL name                                |  |
| Date notified  |  |

# SPARK ACADEMY

# SAFEGUARDING POLICY

## Appendices

### 2. LADO Concern Form

[Redacted]

Time notified

[Redacted]

Threshold decision and rationale

[Redacted]

Referral details (if applicable)

[Redacted]

**Section 8: Advice / Outcome from LADO or Other Agencies**

Outcome / Advice

[Redacted]

**Section 9: Safeguarding Measures Implemented**

Interim measures

[Redacted]

**Section 10: Follow-Up and Review**

Next steps

[Redacted]

Review date

[Redacted]

Case closed date

[Redacted]

**Section 11: Signatures**

Completed by (name)

[Redacted]

[Redacted]

Signature

[Redacted]

Date

[Redacted]

Reviewed by (DSL / Deputy DSL)

[Redacted]

Reviewer signature

[Redacted]

Reviewer date

[Redacted]

Data Protection: Information recorded on this form is confidential and must be stored securely and shared only on a need-to-know basis.

# SPARK ACADEMY SAFEGUARDING POLICY

## Appendices

3.

### Parental Consent Supervision Form

**Spark Academy Tutoring**  
**Parental Consent Form – Supervision During Tuition Sessions**

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Confidential Safeguarding Document

**Child's Details**

Child's Full Name

Date of Birth

Address where tuition will take place

**Parent / Guardian Details**

Parent / Guardian Full Name

Relationship to Child

Contact Telephone Number

Email Address

Tutor Name(s) (if known)

Type of Tuition (In-person / Online)

**Spark Academy Tutoring**  
**Parental Consent Form – Supervision During Tuition Sessions**

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Confidential Safeguarding Document

**Parental Consent and Acknowledgement**

I confirm that I am the parent or legal guardian of the child named in this form. I understand that Spark Academy Tutoring expects a responsible adult to be present within the home during tuition sessions, whether delivered in person or online.

I confirm that it is my decision to allow my child to participate in tuition sessions without my presence.

I understand and accept that Spark Academy Tutoring does not assume any liability or responsibility for the actions, conduct, or behaviour of freelance tutors during tuition sessions. I acknowledge that tutors are responsible for their own actions at all times.

I further acknowledge that the ultimate responsibility for my child's supervision, safety, and safeguarding during tuition sessions remains with me.

**Declaration**

Parent / Guardian Name (print)

Signature (type name)

Date