

SPM Development Services Ltd

Safeguarding and Child Protection Policy

Reviewed and Updated: July 2026

Next Review: September 2027, or sooner if statutory guidance changes.

Approved by: Simon Piper-Masha

Purpose and Scope

This policy sets out how SPM Development Services Ltd will safeguard and promote the welfare of children and young people. It applies to all staff, contractors, volunteers, and anyone working on behalf of the organisation. Our duty is to have regard to Keeping Children Safe in Education (KCSIE 2026), Working Together to Safeguard Children (2023), the Alternative Provision Guidance (2024), the Prevent Duty (2023), the Children Missing Education statutory guidance (2024), and relevant data protection legislation, including the Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025.

Our Principles

- The welfare of children is paramount.
- Children should never experience abuse of any kind.
- We work in partnership with parents, carers, local authorities, and other professionals.
- All children, regardless of protected characteristics, have equal rights to protection.
- Some children, including those with additional vulnerabilities (such as children in kinship care, children with social workers, and gender-questioning children), may need additional safeguards.
- Children with special educational needs and disabilities (SEND), including those with Education, Health and Care Plans (EHCPs), may face additional safeguarding challenges and barriers to disclosing concerns.
- All staff should maintain an attitude of "it could happen here" and act in the best interests of the child whenever safeguarding concerns arise.

Designated Safeguarding Lead (DSL)

SPM Development Services Ltd has a Designated Safeguarding Lead (DSL):

DSL: Simon Piper-Masha

Email: simon@spmdevelopmentservices.co.uk | Tel: 07787 530009

The DSL is the main point of contact for safeguarding concerns and liaises with partner organisations, local authority safeguarding teams, and the Local Authority Designated Officer (LADO) when appropriate. The DSL undertakes formal safeguarding training at least every two years and receives regular safeguarding updates, enabling them to keep their knowledge and skills up to date in line with KCSIE.

Reporting Concerns and Disclosures

All concerns, suspicions, or disclosures must be reported to the DSL immediately. Staff must never promise confidentiality, must avoid leading questions, and must report using the child's own words wherever possible.

Staff should exercise professional curiosity where something does not feel right, even where there has been no direct disclosure. Concerns should be discussed with the DSL without delay.

Step-by-step procedure:

- Listen carefully, remain calm, and avoid interrupting.
- Reassure the child but do not promise confidentiality.
- Record the disclosure using the child's exact words where possible.
- Do not investigate or ask leading questions.
- Report to the DSL as soon as practically possible. The DSL will consider the most appropriate course of action, including internal support, Family Help, referral to children's social care or emergency action where required.
- Complete the safeguarding concern record and forward to the DSL.

Staff are expected to complete safeguarding records promptly, factually, and in the required format so that accurate records can be maintained.

If the DSL is unavailable and the concern is urgent, staff must contact children's social care or the police directly, following local safeguarding procedures. The DSL must be informed as soon as practicable.

Low-Level Concerns

In line with Part Four of KCSIE 2026, SPM Development Services Ltd maintains a framework for managing low-level concerns. All concerns, no matter how small, about staff behaviour will be recorded, reviewed by the DSL, and acted upon appropriately. Patterns of low-level concerns will be monitored to ensure early intervention.

Allegations Against Staff

Any allegation that a member of staff or contractor has harmed a child, may have harmed a child, or otherwise poses a risk of harm must be reported immediately to the DSL. The DSL will seek advice from or make a referral to the LADO without delay where the harm threshold may be met, in accordance with Part Four of KCSIE 2026 and local authority procedures. If the allegation is against the DSL, the whistleblowing policy must be followed and the concern reported to the commissioning organisation or LADO directly.

SPM recognises its duty of care to staff and will provide appropriate support during any investigation.

Safer Recruitment

SPM follows safer recruitment procedures in line with KCSIE 2026. This includes:

- Enhanced DBS with children's barred list check for all staff in regulated activity.
- Online searches as part of pre-employment checks.
- Verification of identity, right to work, qualifications, and employment history with explanations for gaps.
- At least two satisfactory references obtained before appointment.
- Overseas checks where relevant.
- Section 128 check where applicable.
- Prohibition from teaching list check where applicable.
- Risk assessments for staff with any criminal history.
- A single central record of all recruitment and vetting checks.
- Staff are expected to subscribe to the DBS Update Service where possible to support ongoing safeguarding checks.

Staff Training and Prevent Duty

All staff will complete safeguarding training at induction, with formal safeguarding training at least every two years. All staff receive safeguarding updates at least annually and whenever significant statutory or local safeguarding changes occur. All staff are required to read Part One of KCSIE annually and confirm this by signing the annual safeguarding declaration.

In addition, all staff must complete Prevent awareness training. The DSL will also complete the Prevent referrals training, as required by the Prevent Duty Guidance (2023).

Alternative Provision

As an Alternative Provision provider, SPM Development Services Ltd works collaboratively with commissioning schools and local authorities to safeguard learners. We recognise that commissioning organisations retain overall responsibility for safeguarding pupils placed

with SPM and will provide information and evidence to support safeguarding due diligence, quality assurance and statutory responsibilities where appropriate.

Attendance and Children Missing Education (CME)

As an alternative provision provider commissioned by local authorities, SPM records attendance at every session. Absences are reported promptly to commissioners. Repeated absence, persistent absence and children missing education will be escalated in line with the 2024 statutory guidance 'Working Together to Improve School Attendance' and the Children Missing Education guidance.

Lone Working and Home Visits

Tutors working in students' homes must:

- Ensure a parent, carer, or responsible adult is present unless alternative arrangements have been explicitly agreed by SPM and reflected within the individual risk assessment.
- Work in communal areas with doors open unless otherwise risk assessed as appropriate for the learner and setting.
- Follow SPM's Lone Worker and Home Visit Policy, including check-in/out systems and dynamic risk assessment expectations.
- Report any risks, incidents, or safeguarding concerns immediately to the DSL.

Physical Contact / Safe Touch

SPM operates a no-touch approach within its 1:1 tuition model.

Tutors must not engage in physical contact with students unless immediately necessary to prevent harm, respond to an emergency, or ensure the immediate safety of the student or others.

This includes, but is not limited to, physical prompting, sensory regulation strategies, massage, therapeutic touch, occupational therapy activities, physical intervention, or any other planned direct-contact support.

Where a student requires medication, personal care, medical support, therapeutic input, sensory regulation, or other physical assistance during a session, this remains the responsibility of the parent/carers, responsible adult, or relevant external professional.

These boundaries are in place to maintain safeguarding, protect students and staff, preserve professional boundaries, and ensure clear role definition within SPM's tuition model.

Where concerns arise regarding the management of a learner's medical condition, including allergies, staff should report these to the DSL if there is reason to believe the learner may be at increased risk of neglect, abuse or exploitation because of their medical needs.

Online Safety and Cyber Security

SPM is committed to safe online tutoring. Staff must:

- Use SPM-approved platforms only.
- Not share personal contact details with students.
- Follow the staff online code of conduct.
- Report online safeguarding concerns in the same way as in-person concerns.
- Staff should remain alert to safeguarding risks associated with artificial intelligence (AI), including AI-generated images, deepfakes, AI-generated nudes, image-based abuse and the making or sharing of nudes or semi-nudes.
- Adhere to DfE's Cyber Security Standards to protect data and systems.

Additional expectations:

- Tutors must dress and behave appropriately during online sessions.
- Students must have a parent, carer, or responsible adult present in the home during online sessions unless alternative arrangements have been explicitly agreed by SPM and reflected within the individual risk assessment.
- No recording, screenshots, or sharing of online sessions is permitted.
- Parents/guardians are expected to provide a safe, quiet, and appropriate environment for online tutoring.

Child-on-Child Abuse

SPM recognises that child-on-child abuse is a safeguarding issue and may occur both online and offline.

Although SPM primarily provides one-to-one tuition, staff should remain alert to concerns including harmful sexual behaviour, sexual harassment, sexual violence, misogynistic behaviour, bullying and the non-consensual making or sharing of nudes or semi-nudes.

Staff must never dismiss abusive behaviour as "banter", "part of growing up" or similar. Any concerns must be reported to the DSL immediately and managed in line with safeguarding procedures.

Staff Code of Conduct

All staff must follow SPM's Code of Conduct, including:

- Treating all students with respect.
- Avoiding being alone with students where possible.
- Not promising confidentiality.
- Not sharing personal contact details or social media.
- Challenging inappropriate behaviour, including harmful sexual behaviour, misogynistic language and child-on-child abuse, and reporting concerns immediately.

- Maintaining professional boundaries at all times.
- Never being under the influence of alcohol or substances when working.
- Following safeguarding procedures in the event of any concern or disclosure.

Anti-Bullying, Whistleblowing and Complaints

SPM has clear policies on anti-bullying, whistleblowing, and complaints. All staff must be familiar with these and understand how they link to safeguarding practice. If staff feel unable to raise safeguarding concerns internally, or if concerns are not addressed, they may contact the NSPCC Whistleblowing Advice Line or other appropriate external agencies where internal processes have not addressed safeguarding concerns.

Data Protection and Record Keeping

Safeguarding records are kept securely in compliance with the Data Protection Act 2018 and UK GDPR. Safeguarding records should be completed as soon as possible after a concern arises and should include a clear, factual summary of the concern, any action taken, decisions reached and the outcome. Records will be stored securely and accessed only by those with a legitimate safeguarding need.

Safeguarding concerns provide a lawful basis for sharing information with statutory agencies. Information will be shared only with those who need to know, and records will be retained securely. Data protection legislation must never prevent the timely sharing of information where necessary to safeguard or promote a child's welfare.

Policy Review

This policy will be reviewed annually, or sooner if required by updated statutory guidance (e.g., Keeping Children Safe in Education, Working Together to Safeguard Children, or other relevant statutory guidance).