

## Safeguarding & Child Protection Policy

### Statement & scope

Master Class Education (MCE) is fully committed to safeguarding and promoting the welfare of children and young people. We expect all staff, agency workers, contractors and volunteers to share this commitment and to adhere to this policy and associated procedures.

This policy applies to:

- All MCE employees (including senior managers)
- All agency workers, contractors, volunteers and students supplied by or acting on behalf of MCE
- Any third parties engaged in providing services for or on behalf of MCE

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### Definitions

- **Child/young person:** anyone under 18.
- **Safeguarding:** protecting children from maltreatment; preventing impairment of health/development; ensuring safe and effective care; taking action to enable best outcomes.
- **DSL:** MCE's Designated Safeguarding Lead with lead responsibility for safeguarding and child protection.
- **LADO:** Local Authority Designated Officer who oversees the management of allegations against those who work or volunteer with children.
- **Low-level concern:** any concern, however small that an adult's conduct is inconsistent with the code of conduct but does not meet the harm threshold for LADO

### MCE recognise that:

- We have a statutory requirement to ensure and promote the Safeguarding for all children.
- The welfare and safety of any child/young person is a main priority.
- All children have a right to feel and be protected from all types of harm and abuse, no attribute or characteristic should have any impact on the protection of children including age, disability, gender, racial heritage, religious belief, sexual orientation, or identity.
- Working in partnership with all parties is essential in promoting young people's welfare.
- Everyone who encounters them has a role to play in identifying concerns.
- Any concerns must be taken seriously and followed up according to procedure.

- Safeguarding is something that every person must be aware of, and we should all be working towards the prevention of any harm or abuse.
- The safety and well-being of those in vulnerable circumstances is at the forefront of our business.
- MCE are an important part of the wider safeguarding system for children.
- Every procedure put in place is in the best interests of the children.

**We will seek to safeguard children and young people by:**

- Recruiting staff and volunteers safely, ensuring all necessary vetting checks are done.
- Sharing information about child protection and good practice with all members of staff and candidates alike
- All staff members will receive appropriate safeguarding and child protection training which is updated regularly.
- When inducted at Master Class Education staff are given training on safeguarding, its importance and the procedures to follow when presented with a safeguarding concern.
- All staff are equipped with the knowledge of vetting and checks required.
- Relevant staff trained in prevention.
- Staff being able to identify when a person is deemed unsuitable to work with vulnerable people.
- Committing to review our policies and practices regularly.
- Equip our candidates with the knowledge to identify children and young people who are suffering or likely to suffer harm and able to identify abuse or neglect.
- Candidates must know when to take appropriate action if they have reasonable concern that a child is exposed or is likely to be exposed to harm or abuse.
- Sharing information about concerns with all parties involved and communicating with clients and candidates appropriately.
- Providing effective management for staff and volunteers through supervision, support, and training.

**Every child has the right to:**

- Feel and stay safe.
- Equal protection from harm
- Equal opportunity to development
- A healthy lifestyle
- Enjoyment and the opportunity to achieve
- Freedom to form and relay opinions, providing contributions without fear of reproach.
- Their best interest is always considered.
- A life free from violence, abuse, and harm.

**We can achieve this by:**

- Providing a safe environment for them to learn
- Providing relevant training to staff and candidates.
- Identifying children and young people who are suffering or likely to suffer significant harm and taking.

- Appropriate action with the aim of making sure children are kept safe both at home and in the education setting.

### **Roles & responsibilities**

#### **All MCE staff & workers must:**

- Read and follow this policy and **Part 1 of KCSIE**
- Report concerns immediately
- Maintain professional boundaries and comply with MCE/placement school codes of conduct.
- Be aware that if on assignment the schools safeguarding, child protection and report policies supersede MCEs.

#### **MCE DSL (and deputies) will:**

- Be available for staff/worker consultation and escalation.
- Where necessary, manage referrals to children's social care, LADO, police; support workers and liaise with client schools.
- Maintain secure safeguarding records and oversight of patterns/low-level concerns.
- Ensure training, updates and annual policy review.
- Promote a culture of safeguarding and safer recruitment; ensure adequate resources for compliance.
- Ensure allegation procedures are known and implemented.

### **Safer recruitment & pre-placement vetting (agency)**

MCE operates robust safer recruitment to deter and prevent unsuitable individuals from working with children. No worker is deployed until all checks are satisfactorily completed and recorded.

Full details of our Pre-employment checks can be found in our Recruitment and Vetting Policy.

When a school engages MCE workers, MCE provides written confirmation that all required checks have been completed and are satisfactory, as required for agency/supply staff and make relevant documentation available to clients upon request.

### **Training**

All MCE staff receive safeguarding and child-protection training appropriate to their role, updated regularly (and in line with placement school requirements).

- MCE have the ability to offer safeguarding training to workers, should a client request this, training includes recognising abuse, recording/reporting, low-level concerns, online safety, professional boundaries, and allegations management.
- Workers must follow their placement client's policies and procedures.

### **Recognising & responding to concerns**

A. Immediate danger: If a child is at immediate risk of harm, call 999 and inform the Client DSL and MCE DSL as soon as possible.

B. Any other concern or suspicion:

1. Act immediately — do not delay.
2. Record: use MCE's Safeguarding Concern Record (who/what/when/where; child's words in quotes; sign/date/time).
3. Report to the Client's DSL and MCE DSL. If the concern arises in a school, ensure you follow the client's procedures.
4. Do not investigate or promise confidentiality; explain you must share to keep the child safe.

C. Low-level concerns about an adult's conduct:

Report to MCE DSL (and the school's DSL if on placement). MCE will log, review for patterns, and act proportionately; escalate to LADO if threshold is met or behaviour patterns emerge.

### When to Raise a Concern

You must raise a concern immediately if you (this is not an exhaustive list, report whenever you feel it is necessary to):

- See or hear anything that worries you about a child's safety or wellbeing.
- Receive a disclosure, witness concerning behaviour, or notice a significant change in a child.
- Become aware of persistent or unexplained absence, which KCSIE identifies as a safeguarding risk.
- Observe unsafe practice or breaches of professional boundaries.
- Notice concerning behaviour from an adult, even if minor (low-level concern).
- Believe your own actions may have been inappropriate (self-reporting required).

### Reasons to Report

You must report because:

- Statutory guidance requires it — all staff must act on *any* concern without delay. [
- Early reporting prevents harm — Working Together highlights the importance of early identification and multi-agency response.
- You are not responsible for investigating — only reporting.
- Not reporting can be more harmful, and ICO guidance confirms data protection is *not* a barrier to sharing safeguarding information.
- Patterns can only be spotted if all concerns are logged
- Online risks must be treated seriously

### How to Respond

1. Record clearly and factually (what, who, when, where).
2. Report immediately to the school DSL (if on site) and MCE DSL.
3. Do not investigate, promise confidentiality, or discuss the concern with others.
4. If there is immediate danger, call 999.

### **Reporting flow**

1. Emergency → Call 999 → Inform school DSL (if applicable) → Inform MCE DSL.
2. Allegation against adult (harm threshold) → Inform school DSL and MCE DSL/Director immediately → LADO within 1 working day → Follow strategy.
3. Non-emergency concern → Record → Inform school DSL (if on site) and MCE DSL same day.
4. Low-level concern about an adult → Inform school DSL (if on site) → Report to MCE DSL → Record & review → Escalate to LADO if threshold/patterns.

### **Allegations or concerns about adults (including agency/supply workers)**

Where it is alleged that an adult who works with children has:

- harmed a child (or may have);
- possibly committed a criminal offence against/related to a child;
- behaved in a way that indicates they may pose a risk of harm; or
- behaved in a way that indicates they may not be suitable to work with children,

MCE will follow the below process

### **Process**

#### **1. Report immediately:**

- All allegations/concerns must be reported to the MCE DSL/Director straight away.
- Typically, information is obtained by the client school and then passed to MCE.
- If the client is not aware, MCE will inform the client's DSL immediately so they can take appropriate action.

#### **2. Remove from placement:**

- The worker will be stood down from the placement immediately, and MCE will consider suspension from current and future bookings, pending assessment of the concern.

#### **3. Initial threshold decision & LADO consultation (within 1 working day):**

- MCE will review the information and decide whether the allegation may meet the LADO threshold, based on the criteria:
  - Harm or potential harm to a child
  - Criminal offence against/related to a child
  - Behaviour indicating a risk of harm
  - Behaviour indicating unsuitability to work with children
- **If it potentially meets the threshold:**
  - MCE will contact the LADO within 1 working day, jointly with the client DSL where appropriate.
  - A strategy discussion will determine next steps, information sharing, and whether police/social care become involved.
  - MCE will NOT begin any internal investigation before LADO advice, in line with statutory guidance.

#### **4. When the concern DOES meet LADO threshold**

If the LADO confirms that the allegation meets the threshold, MCE will:

##### **A) Follow the LADO-led process**

- Participate in strategy discussions with the LADO, police and children's services as required.
- Provide all relevant information in a timely manner.
- Follow the LADO's direction regarding:
  - Suspension
  - Further enquiries
  - Safety planning
  - Information sharing
  - Supporting the client school
- Work closer with client DSL throughout.

##### **B) Support for the worker and child**

- Maintain communication with the worker (unless instructed otherwise by police/LADO).
- Ensure the worker is given appropriate information and support.
- Ensure the child's voice and safety remain central (LADO requirement).

##### **C) Internal outcomes (post-LADO conclusion)**

- Once the case is concluded, MCE will complete an internal review to determine suitability for ongoing work.
- Where appropriate, training, supervision or formal actions will be taken.
- Follow referral duties (see Section 6 below).

## 5. When the concern does NOT meet LADO threshold

If the LADO (or consultation with the client DSL and MCE DSL) determines the concern does NOT meet the harm threshold:

**A) MCE will manage the concern internally, low-level or conduct concerns.** In-line with the KCSIE the school will lead most investigations as they have access to all necessary information, including staff and students for further statements; MCE will be available to assist the school throughout and provide support where required.

### Actions may include:

- Conducting an internal fact-finding review.
- Speaking to the client DSL and worker to clarify context.
- Reviewing the worker's conduct history for patterns.
- Providing additional training, supervision, or written reminders of professional expectations.
- Implementing support or monitoring measures before the worker returns to placement.
- Recording the concern in the Low-Level Concerns Log.

### B) If patterns or escalation occur:

- MCE will reassess the case and may re-refer to LADO if new information gives rise to threshold concerns.

### C) Communication with the client:

- MCE and the client DSL will share information to enable them to safeguard pupils and manage risk.
- The worker will not be returned to placement until both MCE and the client are satisfied that it is safe to do so.

## 6. Confidentiality & Records

- Maintain strict confidentiality and share information only on a need-to-know basis.
- Record all actions, decisions and outcomes.
- Provide updates to the worker sensitively, unless restricted by police or LADO direction.

## 7. Referrals (DBS/TRA)

If an individual is dismissed, removed from placement, or would have been removed had they not resigned, and the case meets the harm or risk of harm test, MCE will:

- Make a DBS referral (legally required).
- Make a TRA referral for teachers/instructors where applicable.

### **What To Do If You Are Involved In or Accused of a Safeguarding Allegation**

If you are a member of staff or an agency worker engaged through MCE and an allegation is made about you, or you become involved in a safeguarding situation, it is essential that you follow the steps below. These actions ensure compliance with statutory guidance.

#### **1. Remain Calm and Prioritise Safety**

- Do not confront or contact the child or the person making the allegation.
- Maintain professional conduct at all times — you may be required to stop work immediately depending on the nature of the allegation.

#### **2. Report Immediately**

You must inform MCE Designated Safeguarding Lead (DSL) or Director as soon as you become aware of the allegation, even if:

- The allegation seems minor, false, or based on a misunderstanding.
- You believe the situation has been resolved informally.
- You are making a self-referral due to a concern about your own conduct.

**If you are at a client school at the time:**

- Inform the school's DSL immediately.
- Then inform the MCE DSL without delay.

#### **3. Immediate Protective Measures**

- You may be removed from placement while the concern is reviewed.
- This is *not* a presumption of guilt — it is a neutral, protective step advised in statutory guidance.

**You must:**

- Cease work at the placement if instructed.
- Not discuss the allegation with colleagues, pupils, or parents.

#### **4. Cooperate Fully With the Process**

MCE will consult the LADO within one working day if the allegation meets the harm threshold. Depending on the case, you may be asked to:

- Provide a written statement of events.

- Attend meetings (not strategy meetings, as these are for professionals only).
- Clarify timelines or actions you took.

If police or social care become involved, you will be guided on what you can and cannot discuss.

### **5. What Happens If the Allegation *Does Meet* the LADO Threshold**

If the LADO confirms the threshold is met:

- A formal LADO-led process will begin.
- You will not attend LADO meetings (these are between professionals), but MCE will keep you updated appropriately.
- You may be asked to refrain from working in any child-facing role while the investigation is ongoing.
- You will receive support and information from MCE unless police instruct otherwise.

### **6. What Happens If the Allegation *Does Not Meet* the LADO Threshold**

If the concern does not meet the LADO threshold:

- MCE will manage the issue internally following low-level concerns guidance.
- An internal fact-finding process may occur.
- You may be given guidance, reflective practice, additional training, or support.
- This will be recorded in the Low-Level Concerns Log and monitored for patterns of behaviour.
- You may return to work if assessed as safe and appropriate by MCE and the client school.

### **7. Your Right to Support**

MCE will:

- Treat you fairly and impartially.
- Keep your information confidential, sharing only on a need-to-know basis in line with data protection and safeguarding law.
- Provide you with regular updates unless restricted by the police or the LADO process.
- Offer guidance on next steps, expectations, and welfare support.

### **8. Your Duty to Maintain Confidentiality**

You must:

- Not discuss the allegation with colleagues, pupils, parents, or on social media.
- Not attempt to contact witnesses or the child involved.
- Comply with all instructions from MCE, the client school, or investigative agencies.

Confidentiality is critical to protecting both you and the child.

## 9. Outcome and Next Steps

Once the process concludes:

- You will be informed of the outcome and next steps.
- If the allegation is unsubstantiated or unfounded, MCE may consider additional training before returning you to work.
- If the allegation is substantiated, MCE may:
  - End your placement(s)
  - End your registration
  - Make mandatory referrals to the DBS and/or the TRA where appropriate

Records will be kept securely and retained in accordance with statutory guidance.

## 10. If You Believe You Are Being Treated Unfairly

You may raise concerns through:

- MCE's whistleblowing procedure
- The LADO directly (if appropriate)
- The NSPCC whistleblowing helpline
- Your union or professional body (if applicable)

### Information sharing, confidentiality & data protection

- Safeguarding first: UK data protection law enables proportionate information sharing to protect a child; it is not a barrier to safeguarding.
- Lawful bases: Depending on context, MCE may rely on legal obligation, vital interests and/or legitimate interests to share safeguarding information without consent where appropriate; consent is not usually required for safeguarding disclosures.
- What we do: Share only what is necessary, record decisions, store records securely, control access on a need-to-know basis and follow retention schedules in line with UK GDPR/DPA.

### Online safety & digital conduct (for agency workers)

- Follow the client school's online-safety rules, filtering & monitoring and acceptable use policies always (including remote/online teaching).
- No personal devices for contacting pupils; no social media contact; use only school-approved platforms; follow guidance for remote lessons (visibility, recording, environment).
- Be alert to online risks, including misinformation, disinformation and conspiracy theories influencing children; report concerns promptly.

### Whistleblowing

MCE encourages a culture where staff and workers raise concerns without fear. Use MCE whistleblowing policy to appropriately report concerns. If internal routes feel compromised or the concern is about MCE leadership, workers may escalate directly to the LADO, local authority children's social care, police, or the NSPCC Whistleblowing Advice Line.

### **Record keeping**

- All safeguarding concerns, decisions and actions are recorded promptly, signed/dated, and stored securely.
- Low-level concerns are recorded separately and reviewed for emerging patterns.
- Data retention follows MCE's retention schedule and legal requirements; access is strictly controlled.

### **Safer working expectations**

- Maintain professional boundaries; avoid being alone with a pupil wherever possible; follow client school's supervision ratios and directions.
- Use only school-approved communication channels; no personal gifts or transport; follow school behaviour & physical contact policies.
- Report any concern immediately — including self-reporting if you make a mistake or boundary slip (low-level concern).

### **Review**

- This policy is reviewed at least annually and whenever statutory guidance is updated.