



Roots & Waves

CHILD PROTECTION AND SAFEGUARDING POLICY

Bespoke and personalised individual 1:1/small group academic tutoring and holistic mentoring for home-educated young people and young people with SEND - London Borough of Sutton

Our Delivery Context

Roots & Waves provides individual, personalised academic tutoring, holistic mentoring, and flexible alternative provision for home-educated participants, those accessing EOTIS via direct payments, and young people with special educational needs and/or disabilities (SEND). Our primary focus is re-engagement, wellbeing, and confidence. Our tutoring sessions embed core Literacy and Mathematics skills aligned with both the Early Years Foundation Stage (EYFS) and the Primary National Curriculum. Alongside academic support, our mentoring sessions focus on re-engagement—using real-life experiences and nature to foster strong personal, social, and emotional skills. Operating as a Non-School Alternative Provision, Roots & Waves is not a school and does not deliver a full academic curriculum. Throughout our policies, young people are referred to as ‘participants’ and parents/carers or engaging services as ‘clients’.

We do not operate from fixed premises. Tutoring/mentoring sessions are delivered 1:1/small groups in the community and in participants’ homes, including outdoor woodland (“forest school” style). Mentoring locations normally start at the participants homes with locations of sessions being agreed upon with client, participant and staff. Session locations may change at short notice. Staff and participants may travel to sessions independently, including by car, and sessions are participant-led: staff dynamically assess risks and adapt activities, teaching and planning as each session develops.

Roots & Waves is currently a sole-practitioner organisation: the Director, Designated Safeguarding Lead (DSL) and learning collaborator are the same person. Because internal escalation is not possible, our procedures build in clear external routes: the Sutton Local Authority Designated Officer (LADO), Sutton Children’s First Contact Service (CFCS), and an external safeguarding support: Mark Wrangles, Consultant at Close the Gaps. All policies are aligned to Keeping Children Safe in Education (KCSIE) 2026 and the procedures of the Sutton Local Safeguarding Children Partnership (LSCP).

Purpose

The purpose of this policy is to ensure that Roots & Waves takes timely action to safeguard and promote the welfare of every participant, that the learning collaborator is fully aware of their safeguarding responsibilities, and that Roots & Waves adopts Keeping Children Safe in Education (KCSIE) 2026 and Sutton Local Safeguarding Children Partnership (LSCP) procedures as benchmark guidance for a non-school alternative provision (AP) delivering 1:1/small group mentoring.

Scope

This policy applies to the Roots & Waves Director/DSL/learning collaborator and to any future staff, volunteers or contractors. It applies to every setting in which tutoring/mentoring sessions take place: participants’ homes, community venues, vehicles, and outdoor locations including woodland environments. It applies whether a participant is referred by a commissioning school or local authority, or engaged directly by a client (for example, a home-educating parent or through EOTIS/EOTAS packages).

Safeguarding Commitment

As an organisation that prioritises the safeguarding of children and all vulnerable people, Roots & Waves is committed to providing a safe environment across all we do by actively adopting strategies that embed a culture of zero tolerance for abuse of any kind.

Key Safeguarding Contacts

Alexandra Huggett – Director, DSL and Learning Collaborator, Roots & Waves	07469 621539 / hello@rootsandwaves.co.uk
External safeguarding support	Mark Wrangles support@closethegaps.co.uk
Sutton Children’s First Contact Service (CFCS) – referrals and advice (Mon–Fri, 9am–5pm)	020 8770 6001 / CFCS@sutton.gov.uk
Sutton out-of-hours Emergency Duty Team	020 8770 5000
Sutton LADO – allegations against adults who work with children	020 8770 4776 / LADO@sutton.gov.uk
Sutton LSCP procedures	www.suttonlscp.org.uk
Police	999 (emergency) / 101 (non-emergency)
NSPCC helpline	0808 800 5000
CEOP (online sexual abuse/exploitation reporting)	www.ceop.police.uk

Because the Director, DSL and learning collaborator are currently the same person, Roots & Waves deliberately builds external checks into every safeguarding route. Participants, clients and professionals can — and are actively encouraged to — contact Sutton CFCS, the Sutton LADO or the NSPCC directly at any time, without going through Roots & Waves first. These contacts are shared with every client and participant at the start of the mentoring relationship and are included in the participant welcome information.

Roles and Responsibilities

The Director / Designated Safeguarding Lead (DSL) / Learning Collaborator

Alexandra Huggett holds all three roles and takes lead responsibility for safeguarding and child protection across everything Roots & Waves does, including online safety. The DSL:

- Is available to participants and clients during all delivery hours to discuss any safeguarding concern
- Refers concerns to Sutton CFCS (and/or the police) and attends strategy discussions and multi-agency meetings when invited
- Where a participant is commissioned by a school or local authority, shares significant safeguarding information with the commissioner the same day and maintains a written contact protocol with the commissioner’s DSL
- Where a participant is home educated and engaged directly by a client, shares concerns with the client the same day unless doing so would increase risk to the participant, in which case advice is sought from CFCS first
- Maintains secure, confidential safeguarding records for each participant
- Undertakes DSL training renewed at least every two years, with annual updates, and Prevent awareness training
- Seeks advice, supervision and challenge from the external safeguarding support and, where relevant, the Sutton LSCP

Managing the absence of internal escalation

In a school, a staff member with a concern about the DSL or needing cover would escalate internally. Roots & Waves cannot do this, so the following external arrangements apply:

- If anyone — participant, client or professional — has a concern about the conduct of the Director/DSL/learning collaborator, they should contact the Sutton LADO directly on 020 8770 4776 / LADO@sutton.gov.uk. This route is publicised to all clients at the start of the mentoring relationship
- If the Director/DSL/Learning Collaborator receives an allegation about their own conduct, or identifies a low-level concern about their own behaviour, they will self-refer to the Sutton LADO within one working day and inform any commissioner

- If the DSL is unavailable (for example, illness) tutoring/mentoring sessions do not run; any live safeguarding concern is handed to Sutton CFCS and, where applicable, the commissioner
- The external safeguarding support provides safeguarding supervision, second opinions on threshold decisions, and an annual independent review of safeguarding practice and records

Definitions

Safeguarding and promoting the welfare of children means: providing help and support to meet the needs of children as soon as problems emerge; protecting children from maltreatment, whether inside or outside the home, including online; preventing the impairment of children's mental and physical health or development; ensuring children grow up in circumstances consistent with safe and effective care; and taking action to enable all children to have the best outcomes.

Child protection is part of this definition and refers to activities undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm.

Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse. Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

Sharing of nudes and semi-nudes (also known as sexting or youth-produced sexual imagery) includes images and/or videos that have been digitally altered or wholly generated using artificial intelligence ("deepfakes"). All such incidents, whether consensual or non-consensual, require a safeguarding response (KCSIE 2026).

Children includes everyone under the age of 18; at Roots & Waves, young people receiving mentoring are called participants and their parents/carers are called clients.

The three safeguarding partners for Sutton are the local authority (London Borough of Sutton), the integrated care board, and the Metropolitan Police, working together as the Sutton Local Safeguarding Children Partnership (LSCP).

Equality Statement

Many Roots & Waves participants have SEND, are home educated, or have experienced disrupted education — all factors that can raise safeguarding risk and create additional barriers to recognising or disclosing abuse. We are committed to anti-discriminatory practice and ensure every participant has the same protection regardless of any barrier. We give special consideration to participants who: have SEND or health conditions; are young carers; may experience discrimination due to race, ethnicity, religion, gender identification or sexuality; have English as an additional language; live in difficult circumstances; are at risk of FGM, sexual exploitation, forced marriage or radicalisation; are asylum seekers; are affected by their own or a family member's mental health needs; are looked after or previously looked after; or have been out of education for prolonged periods.

Safe 1:1/Small Groups Working

1:1/small groups tutoring/mentoring sessions are our delivery model, not an exception, so the standard school-based expectation of "avoiding being alone with a child" is replaced with layered safeguards designed for 1:1/small groups community-based work:

- Written client consent is obtained before mentoring begins, covering the delivery model, locations, transport and communication arrangements
- The initial meeting is never 1:1/small groups: it is held with the client (and commissioner or other professionals where relevant) present
- Every session is logged: date, time, location, activities, any concerns, and any changes made through dynamic risk assessment. Session summaries are available to clients
- Clients always know the planned location and timing of each session, and are informed of location changes as they happen
- The lone-working check-in/check-out system operates for every session (see Lone Worker Policy)

- Participants keep their own mobile phones during sessions — the phone is respected as a regulation tool and a means for the participant to contact their client or others at any time
- Participants and clients are told, in age-appropriate ways, how to raise a concern about the learning collaborator and staff, including directly to the Sutton LADO or NSPCC
- Physical contact is limited to what is necessary, proportionate and appropriate (e.g. first aid, safety in outdoor environments) and is recorded and shared with the client the same day
- Transport of participants in staff cars only takes place with written client (and where relevant commissioner) consent, appropriate business insurance, and a completed transport risk assessment (see Health & Safety and Lone Worker policies)
- Feedback is actively sought from participants and clients, and the external safeguarding support reviews session logs and safeguarding practice at least annually

Recognising Abuse and Taking Action

The learning collaborator and staff are trained to identify and recognise all forms of abuse, neglect and exploitation, and is alert to the potential need for early help — particularly relevant to our cohort — for any participant who: has SEND; is a young carer; is bereaved; shows signs of being drawn into anti-social or criminal behaviour, including county lines and serious violence; goes missing from education, care or home; is at risk of modern slavery, trafficking, sexual and/or criminal exploitation; is at risk of radicalisation; is viewing problematic online content; lives with drug or alcohol misuse, adult mental health issues or domestic abuse; misuses drugs or alcohol; is experiencing mental ill health; is at risk of honour-based abuse including FGM or forced marriage; is privately fostered; has a parent in custody; is missing education or not in receipt of full-time education; or has experienced multiple suspensions or exclusion.

If a participant is suffering or likely to suffer harm, or is in immediate danger

- Call 999 if a participant is in immediate danger
- Refer to Sutton CFCS the same day: 020 8770 6001 / CFCS@sutton.gov.uk (Mon-Fri 9am-5pm) or the online CFCS referral form; out of hours, call the Emergency Duty Team on 020 8770 5000
- Anyone can make a referral — clients and other professionals do not need to go through Roots & Waves
- Where there is a commissioner, inform them the same day

If a participant makes a disclosure

Staff will: listen and believe, allowing the participant to talk freely without leading questions; stay calm; reassure the participant they have done the right thing; never promise confidentiality, and explain what will happen next; write up the conversation as soon as possible in the participant's own words, sticking to facts; sign and date the record; and act on it the same day. Because tutoring/mentoring sessions are 1:1/small groups and often in informal settings — walking in woodland, by the coast, in a car — disclosures may come unprompted and mid-activity. The learning collaborator is prepared to manage a disclosure calmly within the session, keep the participant safe and regulated, and complete records immediately afterwards.

If you have concerns about a participant (rather than evidence of harm)

Staff will record the concern, consider the threshold using Sutton LSCP guidance, consult the external safeguarding support or CFCS for advice where useful, and refer where appropriate. Concerns are never sat on: if in doubt, we consult CFCS. If the situation does not improve after a referral, we follow Sutton LSCP escalation procedures.

Early help and Family Help

Where a participant would benefit from targeted early support, the DSL will liaise with Sutton's early help arrangements (including the local-authority-coordinated, consent-based "Family Help" offer described in KCSIE 2026) via CFCS, and may support or lead an early help assessment alongside other professionals and the client.

FGM

If staff are informed by a girl under 18 that FGM has been carried out on her, or observes physical signs that suggest it, this is reported to the police personally and immediately — a mandatory statutory duty — and discussed with CFCS. If a participant is believed to be at risk of FGM, the DSL follows Sutton LSCP procedures and refers to CFCS. Staff never examines a participant.

Extremism and radicalisation

Concerns that a participant is at risk of radicalisation are referred through Sutton CFCS and, where appropriate, to Channel via the Prevent referral routes. In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321. The DfE helpline for extremism concerns is 020 7340 7264 / counter.extremism@education.gov.uk. Because sessions are participant-led and often involve open conversation, staff are well placed to notice changes in views, language or online activity, and treats these with professional curiosity.

Mental health

Mental health problems can be an indicator of abuse, neglect or exploitation. Many participants come to Roots & Waves precisely because anxiety or other needs have disrupted their education, so the learning collaborator maintains a high level of attention to behavioural signs, escalating any concern that is also a safeguarding concern via the routes above, and otherwise working with the client (and GP/CAMHS where involved) to put support in place early.

Concerns or Allegations About the Learning Collaborator or Any Adult

Any concern that the Director/DSL/learning collaborator — or any future staff member or volunteer — has behaved in a way that has harmed a child, may have harmed a child, may pose a risk of harm, or may be unsuitable to work with children (including behaviour outside work) must go to the Sutton LADO: 020 8770 4776 / LADO@sutton.gov.uk, within one working day. Clients and participants are given this contact at the start of the mentoring relationship precisely so that concerns about the sole practitioner can be raised independently. The LADO route also applies to low-level concerns, which the Director will record and, given the absence of an internal case manager, discuss with the LADO and/or external safeguarding support for transparency. Where a commissioner is involved, they are informed the same day. Roots & Waves will never investigate an allegation against its own practitioner internally.

Child-On-Child Abuse

Because most delivery is 1:1/small groups, participants do not often mix during Roots & Waves tutoring/mentoring sessions, so the day-to-day risk of child-on-child abuse within sessions is structurally low. However, the learning collaborator and staff remains alert to child-on-child abuse occurring in participants' lives outside sessions or during small group work — including bullying, online abuse, teenage relationship abuse, sexual violence and harassment, and the sharing of nudes and semi-nudes — and treats anything disclosed or observed as a safeguarding matter under this policy: record, refer to the DSL process, contact CFCS and/or police where thresholds are met, and never dismiss abuse as banter or part of growing up. Appendix 2 gives further detail.

Online Safety and Mobile Technology

Roots & Waves recognises that technology is a significant component of many safeguarding issues. Our approach reflects our delivery model — there is no school network, no computer suite and no phone-free rule:

- Participants keep their own phones during tutoring/mentoring sessions. For many of our participants the phone is a genuine regulation tool, and confiscating it would undermine trust and wellbeing. Expectations for phone use during sessions are agreed individually with each participant and client as part of the participant agreement
- Staff remain alongside the participant during sessions, so any device use happens with a trusted adult present — supervision is relational rather than technical
- Any device provided by Roots & Waves has age-appropriate filtering and monitoring configured at device level, reviewed at least annually and recorded, in line with the DfE filtering and monitoring standards applied proportionately to a non-school 1:1/small groups provision (KCSIE 2026)

- Staff never communicates with participants through personal social media accounts; communication with participants and clients uses agreed, transparent channels that clients can see
- Concerns about online harm — content, contact, conduct or commerce risks, including AI-generated “deepfake” imagery — are treated as safeguarding concerns, recorded the same day and referred where thresholds are met
- Roots & Waves has no statutory search powers; if unsafe content or items are suspected, the learning collaborator and staff use consent-based approaches, involves the client, and applies NPCC “When to call the police” thresholds
- Online safety education is woven naturally into mentoring conversations — recognising grooming, exploitation, misinformation and healthy online habits — rather than delivered as classroom lessons
- Photographs of participants are only taken on a Roots & Waves device with recorded client consent, stored securely, and never shared publicly with identifying details; staff personal phones are not used to photograph participants

ONLINE SESSIONS

- Sessions take place on an approved platform (e.g. Zoom/Teams/Google Meet) using an account set up for tutoring, never a personal social media account.
- Staff and participants keep to agreed session times and use the platform's official meeting links only.
- Both parties join from an appropriate, semi-public space where possible (e.g. a living room rather than a bedroom), with a neutral background.

Cameras, recording and privacy

- Cameras stay on for the duration of the session for both parties, unless agreed otherwise in advance with a parent/guardian.
- Sessions may be recorded only with prior written consent from the participant (and their parent/guardian if under 18); recordings are stored securely and deleted after one year.
- No screenshots, recordings or images of the session are shared with third parties.

Communication boundaries

- All communication happens through approved channels only — no private messaging, personal phone numbers, personal email or social media contact.
- Any communication outside sessions is kept to logistics (scheduling, materials) and, for under-18s, is copied to a parent/guardian.

Safeguarding for under-18s

- A parent/guardian gives consent before sessions begin and is welcome to be present or nearby at any time.
- A responsible adult is aware the session is taking place and can be contacted if needed.
- If staff have any concern about a learner's welfare, they will follow the agreed safeguarding procedure and report it in line with policy guidance..

Appropriate content and behaviour

- Sessions stay focused on the agreed learning goals; conversation and materials remain age-appropriate and professional at all times.
- Either party may end a session if they feel uncomfortable, and can raise concerns with Alexandra Huggett afterwards.
- Personal or sensitive information is not requested or shared beyond what is needed for the tutoring/mentoring relationship.

Confidentiality and Information Sharing

Timely information sharing is essential to effective safeguarding, and fears about sharing must never stand in the way of protecting a child. The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the

purposes of keeping children safe; “safeguarding of children and individuals at risk” is a lawful processing condition allowing information to be shared without consent where seeking consent would place a child at risk. Staff never promises a participant secrecy. Where a participant asks that information not be shared, the DSL balances their wishes against the duty to protect them and others, informing clients unless doing so would increase risk. If in doubt, advice is sought from CFCS or the external safeguarding support..

Record-Keeping

All safeguarding concerns, discussions, decisions and their rationale are recorded in writing in a separate, secure child protection file for each participant, held confidentially and retained in line with our retention schedule after a participant leaves. Where a participant moves to a school or another provider and there are safeguarding concerns, the DSL ensures the child protection file (or relevant information, where Roots & Waves holds records alongside a commissioner) is transferred securely and promptly — within 5 days for an in-year transfer — and speaks directly to the receiving DSL where concerns are significant or complex.

Training

- The Director/DSL/learning collaborator reads KCSIE 2026 Part 1 and Annex A in full and undertakes DSL training renewed at least every two years, with annual refreshers, plus Prevent awareness training
- Training covers online safety, child-on-child abuse, harmful sexual behaviour, and the specific risks of lone 1:1/small groups community-based work
- Any future staff or volunteers will complete safeguarding induction — including KCSIE Part 1 in full (KCSIE 2026 has withdrawn the condensed annex option) — before any unsupervised activity, will hold enhanced DBS checks with children’s barred list checks, and will receive annual refresher training
- Safer recruitment training will be completed before any future recruitment exercise (see Safer Recruitment Policy)
- A training log is maintained and available to commissioners and the external safeguarding support

Participants Who Go Missing from Tutoring/Mentoring Sessions

A participant going missing from a tutoring/mentoring session — including in open outdoor environments — is a potential indicator of abuse, neglect or exploitation. Staff follow the Roots & Waves Absconders Policy: immediate search of the vicinity balanced against dynamic risk, contact with the client, police contact where risk indicates, same-day notification to any commissioner, and recording. Repeated absence from sessions is reviewed with the client and, where applicable, the commissioner and Sutton’s Elective Home Education/CME teams, recognising that absence can signal wider safeguarding issues.

Appendix 1: Types of Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child, including fabricated or induced illness.

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child’s emotional development. It may involve conveying to a child that they are worthless or unloved; silencing or mocking them; imposing developmentally inappropriate expectations; seeing or hearing the ill-treatment of another; or serious bullying, including cyber-bullying.

Sexual abuse involves forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening, including physical contact and non-contact activities such as involving children in looking at or producing sexual images, or grooming a child in preparation for abuse, including online. Sexual abuse can be perpetrated by women and by other children as well as by adult males.

Neglect is the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development, including failing to provide adequate food, clothing and shelter, protect a child from harm, ensure adequate supervision, or ensure access to appropriate medical care.

Appendix 2: Specific Safeguarding Issues

Children absent from education

Absence from education, particularly repeated absence, can be a warning sign of a range of safeguarding issues. Many Roots & Waves participants have already experienced significant time out of education, which is exactly why professional curiosity about patterns of missed tutoring/mentoring sessions matters. We record and follow up all missed sessions, provide same-day information to any commissioner (who leads statutory register and CME actions), and liaise with the client and Sutton's Elective Home Education team where relevant.

Child criminal exploitation (CCE) and county lines

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. Indicators include unexplained gifts or new possessions, association with exploited young people, changes in emotional wellbeing, drug or alcohol misuse, going missing, and disengagement from education. Community-based sessions can surface indicators that classroom settings miss — the learning collaborator records and refers concerns to CFCS and police as appropriate.

Child sexual exploitation (CSE)

CSE is a form of child sexual abuse involving an imbalance of power used to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the gain of the perpetrator. It can occur online and offline, and the victim may believe they are in a consensual relationship. Additional indicators include an older boyfriend/girlfriend, sexually transmitted infections or pregnancy.

Sharing of nudes and semi-nudes

If staff become aware of an incident involving nude or semi-nude images or videos of a participant — including AI-generated or digitally altered imagery — they will not view, copy, share or delete the imagery, will not ask the participant to disclose further detail beyond what is needed to assess immediate risk, will reassure and not blame the participant, and will refer immediately: to police/CFCS where an adult is involved, where there is coercion or blackmail, where the participant is under 13, or where there is any risk of harm. Adult-involved incidents (including financially motivated sexual extortion, "sextortion") are always child sexual abuse offences and are referred to police immediately.

Domestic abuse

Children who witness domestic abuse are victims. Because we work in participants' homes, staff may directly observe indicators that other professionals never see — this is treated as privileged safeguarding visibility, recorded factually, and referred where thresholds are met. Any disclosure or observation of domestic abuse is discussed with CFCS.

So-called honour-based abuse, FGM and forced marriage

HBA encompasses crimes committed to protect or defend the "honour" of a family or community, including FGM, forced marriage and breast ironing. Staff are alert to indicators (detailed in KCSIE and Sutton LSCP guidance) and follows the FGM mandatory reporting duty. Forced marriage concerns can be discussed with the Forced Marriage Unit: 020 7008 0151 / fmu@fco.gov.uk. The "one chance" rule applies: we may have only one opportunity to speak to a potential victim.

Radicalisation and extremism

Signs can include withdrawal from friends and activities, expressions of sympathy for extremist ideologies, accessing extremist material, secretiveness around internet use, and scripted speech. Low self-esteem and isolation — common in young people out of mainstream education — can increase susceptibility, which is why re-engagement mentoring itself is protective. Concerns follow the referral routes in this policy.

Serious violence

Indicators that a participant may be at risk from or involved with serious violent crime include unexplained injuries or gifts, changes in friendships toward older individuals or groups, decline in wellbeing, and increased absence. Staff report any such concern via the DSL process, and recognises the national focus on violence against women and girls (VAWG): misogynistic attitudes and behaviours are treated as potential safeguarding concerns in line with KCSIE 2026.

Participants with SEND

Participants with SEND face additional safeguarding barriers: assumptions that indicators relate to their needs or disability; communication barriers; disproportionate impact of bullying; and cognitive differences in interpreting online content. As a provision built for young people with SEND, Roots & Waves plans for these barriers in every risk assessment and communicates in each participant's preferred style.

Participants with a social worker, and looked-after children

Where a participant has a social worker, the DSL works with and supports them, and this fact informs decisions about absence, support and information sharing. For looked-after and previously looked-after participants, the DSL holds details of the social worker and, where a commissioner is involved, the relevant virtual school head.

LGBTQ+ participants and gender-questioning children

Participants who are or are perceived to be LGBTQ+ can be targeted by others and are more likely to experience poor mental health; the 1:1/small groups relationship offers a safe space to talk, and concerns are reported through the DSL process. For gender-questioning participants we take the considered, cautious approach described in KCSIE 2026, working in partnership with clients (other than in the exceptional circumstances where involving them would itself create significant risk), taking into account clinical advice where available and the participant's wider needs and vulnerabilities.

Policy Context

Roots & Waves operates as a non-school alternative provision and 1:1/small groups mentoring service. Where a school or local authority commissions a place, the commissioner retains statutory responsibilities for admissions, attendance registers and coding, exclusions and Children Missing Education; Roots & Waves provides same-day safeguarding and attendance information to support those duties. Where clients engage Roots & Waves directly for a home-educated participant, safeguarding duties are discharged through this policy, Sutton LSCP procedures and direct referral routes to CFCS. Roots & Waves adopts the DfE Non-school alternative provision voluntary national standards (31 August 2025) as benchmarks, and does not hold or use school statutory powers (searching, screening, detention); we use consent-based approaches and NPCC "When to call the police" thresholds.

This policy relates to: KCSIE 2026; Working Together to Safeguard Children 2023; the Children Act 1989 and 2004; the Female Genital Mutilation Act 2003 (s.5B(11)) and statutory FGM guidance; the Rehabilitation of Offenders Act 1974; the Safeguarding Vulnerable Groups Act 2006; Prevent duty statutory guidance; the Human Rights Act 1998; the Equality Act 2010 and the Public Sector Equality Duty. Related Roots & Waves documents: Safeguarding Statement of Intent; Lone Worker Policy; Health & Safety Policy; E-Safety Policy; Behaviour Policy; Anti-Bullying Policy; Absconders Policy; First Aid & Medication Policy; Physical Intervention Policy; Safer Recruitment Policy; Whistleblowing Policy; Complaints Policy; Data Protection Policy.

Version Control

We review our documentation regularly and reserve the right to amend our policies and procedures at any time.

REFERENCE:	V01 – 07/2026
OWNERSHIP:	Alexandra Huggett, Director – Roots & Waves
AUTHORISED BY:	Alexandra Huggett, Director
REVIEW:	Annually – September 2027, or sooner if guidance or delivery changes

Version	Date	Change summary	Author/Reviewer	Approved by
1	09/2026	Initial Roots & Waves version, adapted for 1:1/small groups	Alexandra Huggett - Director	Alexandra Huggett - Director



CHILD PROTECTION

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Version	Date	Change summary	Author/Reviewer	Approved by
		community-based tutoring and mentoring in Sutton; aligned to KCSIE 2026		