



Child Protection & Safeguarding Policy

September 2025

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OUR SAFEGUARDING STATEMENT

The purpose of this policy statement

Lunar learning tutors works with children and families as part of its services. The services include one to one tutoring in person or online. The in-person tutoring will be either at the student's home, school or a requested suitable public setting.

The purpose of the policy statement is

- To protect children and young people who receive services from Lunar Learning. This includes the children of adults who use our services.
- To provide parents, staff and volunteers with the principles that guide an approach to children protection.

This policy statement refers to anyone working on behalf of Lunar Learning.

Legal Framework:

This policy has been drawn up based on legislation for children protection in England. The legislation framework and guidance can be found at:

[Child protection system for England | NSPCC Learning](#)

At Lunar Learning we have a responsibility to promote the welfare and well being of all children and young people to ensure they are kept safe. At Lunar Learning we ensure policies and procedures are followed and practised in a way that safeguards all children and young people.

We recognise that:

- that the welfare of the child is paramount
- that all children regardless of age, gender, race, religion, disability, belief or sexual orientation have a right to equal protection from all types of harm or abuse

- some children may be vulnerable due to past trauma or the impact of previous experiences
- working in partnership with parents, carers and multi agencies is essential in promotion young people's welfare

We will seek to keep young people safe by:

- valuing, listening to and respecting them at all times
- developing child protection safeguarding policy and procedures that reflect best practise
- following our safeguarding procedures to share concerns and relevant information with agencies who need to be informed and involving young people, parents, families and carers appropriately
- sharing best practise for safeguarding with staff, young people, parents and carers.
- ensuring relevant checks are made in line with our compliance procedures when recruiting staff
- providing staff with relevant training to ensure they have the correct knowledge to effectively safeguard our students
- implementing a code of conduct for staff
- using our procedures to manage allegations against staff appropriately
- ensuring that we have effective whistleblowing and complaints procedures in place
- ensuring that the environment are students are tutored within is safe and secure
- recording and securing information professionally by ensuring its secure

KEY DEFINITIONS

The practices and procedures within this policy are based on the principles contained within UK legislation and Government Guidance and have been developed to complement Strategic Partnership Board policy and procedures.

They take into consideration:

- Human Rights Act of 1998
- Children Act 1989
- Sexual Offences Act of 2003
- Children Act 2004
- Serious Crime Act 2015

- Working Together to Safeguard Children 2018
- Keeping Children Safe in Education 2018
- Data Protection Act of 2018 Definitions
- *Child* — In England, Northern Ireland and Wales a child is someone under the age of eighteen whether living with their families, in state care, or living independently (Working Together to Safeguard Children 2018).
- *Safeguarding and promoting the welfare of children* — Protecting children from maltreatment, preventing harm to children's health or development, ensuring children grow up with the provision of safe and effective care, and taking action to enable children to have the best outcomes.
- *Abuse* — A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children.
- *Safeguarding concern* — Any situation when there is information that a child or an adult at risk has been harmed, or is at risk of being harmed, by their own or someone else's behaviour.
- *Safeguarding allegation* — If the information identifies the involvement of an employee or self-employed tutor of Oxford Tutors this will be known as a 'safeguarding allegation'. This will apply where a person in connection with Oxford tutors has: o behaved in a way that has harmed a child, may have harmed a child, or behaved in a way that might lead to a child being harmed o possibly committed or is planning to commit a criminal offence against a child or related to a child o behaved towards a child in a way that indicates they are, or would be, unsuitable to work with children.

The role of the staff when working for Lunar Learning

The staff at Lunar Learning are responsible for:

prioritising the welfare of the young people

providing a safe environment for children and young people. o This includes ensuring equipment is used safely and for its intended purpose; and o having good awareness of issues to do with safeguarding and child protection and taking action when appropriate.

- following our principles, policies and procedures. o This includes policies and procedures for child protection/safeguarding, whistleblowing and online safety.

- always staying within the law
- modelling good behaviour for children and young people to follow
- challenging all unacceptable behaviour and reporting any breaches of the behaviour code
- reporting all allegations/suspensions of abuse following our reporting procedures. This includes abusive behaviour being displayed by an adult or child and directed at anybody of any age.

Rights

You should:

- treat young people fairly without prejudice or discrimination
- respect differences in gender, sexual orientation, culture, race, ethnicity, disability and religious belief systems between yourself and others.
- challenge discrimination and prejudice
- encourage young people and adults to speak out about anything that may make them feel uncomfortable

Relationships

You should:

- promote relationships that healthy and based on equal respect
- ensure your contact with young people is appropriate and relevant
- ensure that there is more than one adult present during tutoring

Respect

You should:

- listen to and respect children at all times
- value and take children's contributions into account, allowing them to contribute to ideas

Unacceptable behaviour

You must not:

- allow concerns or allegations to go unreported
- take unnecessary risks
- smoke, consume alcohol or use illegal substances during working hours

- develop inappropriate relationships with the young people
- make inappropriate promises to children and young people
- engage in behaviour that is in any way abusive
- let children and young people have your personal contact details (mobile number, email or address) or have contact with them via a personal social media account
- patronise or belittle young people

PROCEDURES FOR RESPONDING FOR CONCERNS

Purpose

This policy outlines the procedures for reporting safeguarding concerns within a tutoring company. It aims to ensure that all staff, tutors, parents, and students understand how to recognise and report safeguarding issues in a timely and effective manner. The safety and well-being of children are the highest priority, and it is essential that any potential risks, concerns, or incidents are reported and addressed promptly.

Scope

This policy applies to all employees, tutors, volunteers, contractors, and anyone working or involved with the tutoring company, whether in-person or online. It also provides guidance for parents and guardians in reporting safeguarding concerns.

Definition of Safeguarding Concerns

A **safeguarding concern** refers to any suspicion, observation, or disclosure that indicates a child may be at risk of harm, abuse, or neglect. Safeguarding concerns can arise from a range of situations, including:

Physical Abuse: Signs of injury or harm caused by another person.

Emotional or Psychological Abuse: Indicators of significant emotional distress or manipulation.

Sexual Abuse: Any inappropriate sexual behaviour or language.

Neglect: Failure to provide for a child's basic needs, such as food, shelter, and medical care.

Bullying or Cyberbullying: Any form of bullying, either in-person or online, that affects the well-being of a student.

Exposure to Harmful Content: Access to inappropriate content (e.g., violent, sexual, or extremist material) during tutoring sessions.

Risk of Radicalisation: Suspected involvement in or exposure to extremist views or behaviours.

Concerns may also include observing a child's unusual behaviour, an unsettling disclosure made by the child, or identifying risks in the environment.

Immediate Action

If a child is in immediate danger or at risk of harm, tutors and staff should take urgent action:

- **Call emergency services (999 or local emergency number)** if the child is in immediate danger.
- **Ensure the child's immediate safety** and prevent further harm if possible.
- **Do not investigate the concern** yourself. The role of staff is to report, not to investigate or question the child.

Internal Reporting

Report the concern immediately to the **Designated Safeguarding Lead (DSL)** or the person responsible for safeguarding within the company. The DSL is trained to handle safeguarding issues and will take appropriate action.

- **The DSL will assess the situation** and pass the safeguarding concern over to the school or LA/Council; the DSL will then decide whether to report the concern to external authorities (e.g., child protection services, law enforcement, etc.).
- **Use the company's safeguarding reporting form** to document the concern. The form should be completed accurately and comprehensively, including all relevant details.
 - **Details to include:**
 - Date and time of the incident or concern.
 - Nature of the concern (e.g., physical injury, behavioural signs, verbal disclosures).
 - Any immediate action taken (e.g., contacting emergency services).
 - Information about who was involved or who witnessed the incident.
 - If the concern was raised by the child, a detailed record of the child's words or behaviour.

Confidentiality: Safeguarding concerns should be treated with the utmost confidentiality. Information about the concern should be shared only with individuals who need to know (e.g., DSL, designated authorities, and relevant staff).

Do not confront the individual suspected of causing harm, as this may escalate the situation and interfere with investigations.

Parental/Guardian Notification

Informing Parents or Guardians: In non-urgent cases, the DSL may decide to inform the child's parents or guardians about the concern however will inform the school/LA first. However, in cases where informing the parents could place the child at greater risk (e.g., in cases of domestic abuse), the DSL may decide that it is safer to report the concern directly to the authorities without informing the parents first.

External Reporting

If the DSL believes that the concern constitutes a serious risk or that the child is at immediate risk of harm, the concern should be escalated to relevant external agencies. This may include:

- **Local Child Protection Services:** Reporting suspected abuse or neglect to child welfare authorities.
- **Police or Law Enforcement:** If there is an immediate risk of harm or if a criminal act is suspected (e.g., sexual abuse or physical violence).
- **Other Specialised Agencies:** Depending on the nature of the concern, this may involve reporting to organizations like the NSPCC (National Society for the Prevention of Cruelty to Children) in the UK, or similar agencies in other jurisdictions.

Roles and Responsibilities

Designated Safeguarding Lead (DSL)

- **Oversee all safeguarding concerns** and ensure proper procedures are followed.
- **Conduct initial risk assessments** and decide whether external agencies need to be involved.
- **Maintain accurate records** of all safeguarding concerns, actions taken, and outcomes.
- **Provide support** to tutors and staff on safeguarding matters and ensure they receive appropriate training.

Tutors and Staff

- **Identify and report safeguarding concerns** immediately to the DSL or designated safeguarding officer.
- **Follow the company's reporting procedures** and complete the safeguarding reporting form as required.

- **Attend regular safeguarding training** to ensure they are familiar with identifying signs of abuse and understanding the reporting process.
- **Create a safe, supportive learning environment** and be alert to any signs of distress or harm during tutoring sessions.

Parents/Guardians

Encourage open communication: Parents should feel comfortable discussing concerns with tutors or staff and may report any safeguarding concerns they have directly to the tutoring company.

Support the company's safeguarding procedures: Parents should be aware of their child's rights and the importance of reporting concerns.

Handling Disclosures from Children

If a child discloses abuse or expresses a safeguarding concern during a tutoring session, the tutor must:

- **Listen carefully and calmly:** Do not interrupt the child. Let them speak freely and without judgment.
- **Reassure the child:** Let the child know that they did the right thing by speaking up and that they are not at fault.
- **Do not promise confidentiality:** Explain that, while you will keep the information confidential, you may need to share it with others to keep them safe.
- **Take note of exactly what the child says,** using their words as much as possible. This can be used as evidence if the concern is escalated.
- **Do not ask probing or leading questions:** This can contaminate the disclosure and could potentially harm an investigation.
- **Follow the internal reporting procedure** immediately after the disclosure.

Confidentiality and Record Keeping

- **Confidentiality:** Safeguarding information should be kept confidential and stored securely. It should only be shared with those who need to know in order to ensure the safety of the child.
 - **Record Keeping:** All concerns, actions taken, and outcomes must be documented accurately. These records should be stored securely and retained in accordance with the company's data retention policy and relevant legal requirements.
-

Whistleblowing

If any staff member or tutor feels that safeguarding concerns are not being handled appropriately by the DSL or other staff, they are encouraged to use the company's **whistleblowing policy** to report their concerns. Whistleblowers will be protected from retaliation, and the company will ensure that all concerns are addressed in accordance with safeguarding protocols.

Policy Review

This policy will be reviewed regularly (at least annually) to ensure its effectiveness and compliance with applicable laws and regulations. Any updates or changes to the policy will be communicated to all staff and tutors.

Conclusion

Safeguarding children is a shared responsibility, and the tutoring company is committed to taking all necessary steps to protect the safety and well-being of students. By following the procedures outlined in this policy, all employees and tutors can help ensure that any safeguarding concerns are reported and addressed appropriately, and that children are provided with a safe and supportive learning environment.

CODE OF CONDUCT FOR STAFF

Purpose

This Code of Conduct outlines the professional standards and ethical guidelines expected of all tutoring staff at Lunar Learning. Adhering to these principles ensures a positive and productive learning environment for all our students and a positive environment for staff!

Professionalism

- Treat all students, parents, and colleagues with respect and courtesy.
- Maintain a professional demeanour in all interactions, including communication and appearance.

Integrity

- Be honest and transparent in all dealings with students and parents.

- Avoid conflicts of interest and disclose any potential conflicts to management.

Confidentiality

- Respect the confidentiality of student information and records.
- Do not share personal or sensitive information about students without appropriate consent.

Commitment to Learning

- Strive to create a supportive and encouraging learning environment.
- Encourage students to develop critical thinking skills and foster a love of learning.

Safe Environment

- Always prioritise the safety and well-being of students.
- Report any concerns about student safety or welfare to management immediately.

Professional Development

- Engage in ongoing professional development to enhance teaching skills and stay updated on educational best practices.
- Share knowledge and resources with colleagues to promote a collaborative environment.

Respect for Diversity

- Embrace and respect the diverse backgrounds, cultures, and abilities of all students.
- Foster an inclusive environment that values different perspectives and experiences.

Communication

- Maintain open and constructive communication with students and parents.
- Provide timely feedback on student progress and address any concerns promptly.

Boundaries

- Maintain appropriate professional boundaries with students to ensure a safe and respectful relationship.
- Avoid any behaviour that could be perceived as favouritism or impropriety.

Compliance with Policies

- Adhere to all organisational policies and procedures, including those related to attendance, reporting, and conduct.
- Stay informed about updates or changes to policies.

Acknowledgment

Staff will sign an acknowledge sheet to state that they have read and understand the policy.

ONLINE SAFETY POLICY

Purpose

This Online Safety Policy provides a framework for tutors to ensure safe, ethical, and secure interactions with students in an online learning environment. It aims to protect both tutors and students from potential online risks such as cyberbullying, data breaches, and inappropriate behaviour. The policy also sets clear guidelines for maintaining a professional, respectful, and safe virtual classroom.

Scope

This policy applies to all tutors providing online tutoring services through any digital platform (e.g., video conferencing, chat platforms, or other e-learning tools). It is intended to cover the interaction between tutors and students, the use of online tools, and the security of personal information.

General Responsibilities

- **Professional Conduct:** Tutors must maintain professional and respectful behaviour at all times. Treat students with dignity, respect, and courtesy. Communication should always remain educational and positive.
- **Online Etiquette:** Maintain clear, appropriate communication, including using professional language, avoiding slang or inappropriate comments, and being mindful of tone.
- **Confidentiality:** Tutors must respect the privacy of their students. Never share personal information about students without explicit consent, and ensure all data is handled in compliance with applicable privacy laws (e.g., GDPR, FERPA).

4. Security and Data Protection

Secure Platforms: Tutors must use secure, trusted online platforms for tutoring sessions. Any software or communication tool used should have strong encryption protocols to protect student data and privacy.

Password Protection: Tutors must use strong, unique passwords for their accounts and platforms. Sharing passwords with others is prohibited.

Data Storage: Tutors must ensure that any student data, such as emails, assignments, or recordings, are stored securely and in compliance with relevant data protection regulations. All personal and academic information must be kept confidential.

Cybersecurity: Tutors should be aware of common cyber threats, including phishing, malware, and identity theft. Tutors must have up-to-date antivirus software and security measures on their devices to protect against cyber attacks.

Communication Guidelines

Appropriate Platforms: All communication should occur through the tutoring platform or other channels approved by the tutoring organisation. Avoid using personal email, phone numbers, or social media accounts unless explicitly allowed by the policy.

Respect Boundaries: Tutors should establish clear boundaries for communication, such as hours of availability, response times, and preferred methods of contact. Avoid contacting students outside of scheduled sessions unless necessary and professionally appropriate.

Supervision: Whenever possible, tutoring sessions should be conducted in a way that allows for student safety, such as with recording features or supervisory oversight. Tutors should be aware that their interactions may be recorded or observed.

Interaction with Students

Age-Appropriate Behaviour: Tutors should be aware of the age and developmental stage of their students and adjust their communication style accordingly. Use language and content that is suitable for the student's level of understanding.

No Inappropriate Content: Tutors must refrain from sharing, discussing, or displaying inappropriate content, including offensive language, images, or material that may be deemed inappropriate or harmful to students.

Avoiding Personal Relationships: Tutors must maintain professional relationships with students. Engaging in personal relationships or discussing personal life beyond the scope of tutoring is prohibited. This includes sharing personal social media accounts or communicating in an overly informal manner.

Reporting and Handling Violations

Report Concerns: Tutors must immediately report any concerns about inappropriate behaviour, harassment, or safety threats from students, parents, or other tutors. This includes any form of cyberbullying or inappropriate conduct witnessed during sessions.

Incident Reporting: Tutors should report incidents of technical difficulties, online harassment, inappropriate student behaviour, or data security breaches to the appropriate authority or platform provider promptly.

Compliance: Tutors must comply with the online safety policies set by the platform or tutoring organisation and take part in regular training on online safety, digital literacy, and professional ethics.

Training and Awareness

Ongoing Education: Tutors must undergo regular training on online safety, data privacy laws, digital tools, and best practices in virtual education. This ensures that they remain updated on evolving risks and safety protocols.

Awareness of Child Protection: Tutors working with minors should be familiar with child protection laws and have a clear understanding of how to handle potential safeguarding concerns, including reporting suspected abuse or neglect.

Remote Classroom Setup

Private and Safe Environment: Tutors should ensure that the physical space they are using for online sessions is quiet, well-lit, and free from distractions. The tutor's background should be neutral, professional, and free from inappropriate or distracting images.

Video and Audio Use: Tutors should ensure that video and audio settings are configured properly before the session begins. Always check to ensure that microphones are muted when not in use to avoid accidental interruptions or inappropriate sounds.

Legal Compliance

Copyright and Intellectual Property: Tutors must respect copyright laws and avoid sharing or distributing content (e.g., textbooks, media, etc.) unless they have the appropriate permissions or licenses.

Compliance with Local Laws: Tutors must be aware of and adhere to the laws and regulations in their jurisdiction, including those related to online safety, child protection, and data privacy.

Conclusion

The online safety of both tutors and students is of paramount importance. By following this policy, tutors can help create a secure and positive learning environment, foster trust with students and parents, and minimise the risks associated with online education. Tutors must stay informed and act responsibly to ensure that all interactions remain safe, professional, and productive.

CHILD PROTECTION DATA MANAGEMENT

Purpose

This policy outlines the procedures and protocols for ensuring the protection of children's welfare and personal data within the tutoring environment. The tutoring company is committed to safeguarding children and promoting their well-being while ensuring compliance with data protection laws and best practices.

Scope

This policy applies to all employees, tutors, contractors, and anyone working with children or handling children's data in any capacity within the tutoring company.

Child Protection Policy Overview

The safety and welfare of children are the tutoring company's highest priority. All staff members are required to actively participate in maintaining a safe, secure, and nurturing learning environment.

Key Principles:

Prevention of Harm: Tutors and staff must take steps to prevent abuse, exploitation, and neglect.

Transparency and Accountability: All practices must be clear, transparent, and open to scrutiny.

Confidentiality: All information related to children's welfare and personal data must be treated confidentially and securely.

Reporting Procedures: Tutors must immediately report any concerns about a child's welfare, abuse, or neglect according to company procedures.

Child Protection Guidelines for Tutors

Tutors play a critical role in identifying potential signs of harm and providing a safe environment for children to learn. Below are the specific guidelines:

Behaviour and Conduct

Appropriate Interactions: Tutors must maintain a professional, respectful, and appropriate relationship with children at all times. Physical contact should be avoided unless it is necessary for tutoring purposes (e.g., for special needs students).

No Personal Information Sharing: Tutors must not share personal or private information with students. Communication should remain strictly professional, focusing on the learning objectives.

Monitoring Sessions: All tutoring sessions should be conducted in a safe, monitored environment. Virtual sessions should ideally be recorded or monitored by a supervisor or other adults when possible.

Identifying Abuse and Neglect

Signs of Abuse: Tutors should be trained to recognise the signs of physical, emotional, or sexual abuse, as well as neglect. Common signs include unexplained injuries, withdrawal from normal activities, or sudden changes in behaviour.

Reporting Procedures: If a tutor suspects or becomes aware of any signs of abuse or neglect, they must immediately report the concern to the Designated Safeguarding Lead (DSL) within the company and follow the local child protection reporting procedures.

Confidentiality: Information related to child protection concerns must be handled with the utmost confidentiality. However, the safety of the child must always take precedence.

Data Management and Protection

The company is committed to ensuring that all personal and sensitive data of children (students) is managed in compliance with data protection laws, such as the **General Data Protection Regulation (GDPR)** in Europe, the **Children's Online Privacy Protection Act (COPPA)** in the U.S., and other relevant regulations.

Data Collection

Minimal Data Collection: The company will collect only the minimum amount of personal information necessary to provide the tutoring service. This may include:

- Full name, date of birth, and contact information of the child and parent/guardian
- Emergency contact details
- Learning history and assessment results
- Payment information (if applicable)
- Special needs or medical information (only if required for educational purposes)

Parental Consent: Parental or guardian consent is required for the collection and processing of a child's personal data. Parents or guardians must also provide consent for their child's participation in tutoring sessions, especially in online environments.

Data Storage and Security

Secure Storage: All personal data must be stored securely using encryption and other data protection measures. Data should be accessible only to authorized personnel for legitimate purposes.

Data Minimisation: The company must ensure that personal data is not kept for longer than necessary. Once data is no longer required for its intended purpose, it should be securely deleted or anonymized.

Access Control: Only staff and tutors who need access to a child's data for tutoring purposes will be granted access. Personal data should not be shared outside of the organization without explicit consent, except where legally required.

Online Data Collection and Safety

Parental Oversight for Online Sessions: Parents or guardians must be informed about the online tools being used for tutoring and must provide consent for their child's participation. Parents should be encouraged to supervise their child's online tutoring sessions.

Safe Communication Tools: Only secure, encrypted platforms should be used for online tutoring. All tools and platforms must comply with relevant data protection regulations and be vetted by the company for their safety features.

Recording Sessions: Virtual tutoring sessions should be recorded to ensure the safety of both tutors and students. These recordings must be securely stored and only accessible to authorised staff for quality control and safeguarding purposes. Parents should be informed that sessions may be recorded.

Data Sharing

Sharing of Data with Third Parties: The company will not share any personal data with third parties unless it is necessary for the delivery of services (e.g., payment processors) or required by law (e.g., in the case of child protection concerns). All third-party providers must comply with applicable data protection regulations.

Parent Access to Data: Parents or guardians have the right to request access to their child's data. The company must provide them with a copy of the information held within a reasonable timeframe, as specified by the data protection regulations.

Reporting and Responding to Safeguarding Concerns

Internal Reporting Procedures: If a tutor, staff member, or parent has a safeguarding concern, it should be reported immediately to the company's **Designated Safeguarding Lead (DSL)**. This person is responsible for coordinating the response to

the concern and initially informing the school or LA – ensuring compliance with legal and regulatory obligations.

External Reporting: If a tutor believes a child is in immediate danger, they should contact local authorities or child protection services immediately. This could include local law enforcement, child protective services, or other relevant agencies.

Designated Safeguarding Lead (DSL)

The company will designate a **Safeguarding Lead** to oversee all child protection matters and ensure compliance with this policy. The DSL will be responsible for managing incidents, training staff, and maintaining records related to safeguarding concerns.

Staff Training and Awareness

Child Protection Training: All tutors and staff must undergo regular child protection training. This training will cover topics such as recognising signs of abuse, safe online practices, appropriate communication with children, and how to report concerns.

Policy Review

This policy will be reviewed annually or whenever there are significant changes to relevant laws or practices. Feedback from staff, tutors, and parents will be considered during the review process.

Conclusion

The safety and well-being of children are at the core of this tutoring company's mission. By adhering to these child protection and data management policies, the company aims to create a secure and supportive learning environment for children while ensuring compliance with relevant data protection laws and best practices.

IMPORTANT CONTACTS

Becky Radford – Owner of Lunar Learning:

becky@lunarlearning.co.uk

DSL – Designated safeguarding lead – Hayley Cottrell:

office@lunarlearning.co.uk

WIRRAL Integrated Front Door

Telephone: 0151 606 2008 (Mon – Fri: 9am-5pm)

0151 677 6557 (**Out of hours**)

Email: IFD@wirral.gov.uk

The online request form can be found at: https://wirral-self.achieveservice.com/service/Children_and_families_request_for_support_form

CHESHIRE IArt

Tel: 0300 123 7047

Emergency Duty Team Tel: 01244 977277 (Out of hours)

Monday –Thursday: 8.30am- 5pm

Fri - 8.30am – 4.30pm

Email: i-ART@cheshirewestandchester.gov.uk