



**ACTION TUTORING -
CHILD PROTECTION AND SAFEGUARDING POLICY**

Record of Updates:

January 2021	Jen Fox, Jasmin Bemmelen	Updating regulations in accordance to the government guidance (KCSE 2020) Online Tutoring and home tutoring policies

Child Protection and Safeguarding Policy

All children have an absolute right to a childhood free from abuse, neglect or exploitation. Action Tutoring believes that in all matters concerning child protection and safeguarding, the welfare and protection of the young people^[1] we work with is of paramount consideration. All adults involved in Action Tutoring's activities and who come into contact with children have a duty of care to safeguard and promote their welfare. This policy and the procedures contained within it exist not to discourage adults from being involved in the work of Action Tutoring but to ensure, as far as possible, that people who may abuse children do not get the opportunity to do so.

- There is a duty placed upon us to ensure that all adults who work with or on behalf of our young people are competent, confident and safe to do so.
- Adults working or volunteering for Action Tutoring are responsible for their own actions and behaviour and should avoid any conduct that would lead a reasonable person to question their motivation or intention.
- Everyone involved in Action Tutoring activities must follow Action Tutoring's Code of Conduct.
- They must also be familiar with the steps to be taken in the event of becoming aware of, suspecting or receiving allegations of abuse.

Designated Safeguarding Officer

Action Tutoring have a Designated Safeguarding Officer to:

- Offer support and training to all staff and volunteers involved in Action Tutoring's work.
- To ensure that all Action Tutoring staff and volunteers are sufficiently vetted.
- To act as the main point of contact in the event of any allegation or disclosure.
- To act as the main point of contact between Action Tutoring and partner schools.

If there is an allegation, signs and indicators of abuse are identified or if at any point an adult involved with Action Tutoring's work fails to comply with any element of the Code of Behaviour this information must be passed immediately to Action Tutoring's Designated Safeguarding Officer. It is the Designated Safeguarding Officer's responsibility to collect all relevant information and make decisions on how to proceed (this will include contacting the designated safeguarding lead at the relevant partner school/s). You have a duty of care to pass on all relevant information regarding any allegations of abuse, or identified signs and indicators of possible abuse.

Designated Safeguarding Officer	Susannah Hardyman CEO (maternity leave until August 2021)	susannah@actiontutoring.org.uk // 0203 872 5894
Deputy Safeguarding Officer (Designated Safeguarding Officer 2021)	Jen Fox Interim CEO	jen@actiontutoring.org.uk
HR & Safeguarding Manager	Jasmin Bemmelen	jasmin@actiontutoring.org.uk
Safeguarding Trustee	Jo Conduit	hello@actiontutoring.org.uk
Safeguarding email		safeguarding@actiontutoring.org.uk

In the event of the Designated Safeguarding Officer being unavailable please email one of the following listed above or or call the above telephone number.

Definitions of Abuse

It is important to be aware that many of the forms of abuse can take place either online or in person.

Physical Abuse: physical injury to a child where there is knowledge, or a reasonable suspicion, that their injury was inflicted or knowingly not prevented.

Neglect: the persistent or severe neglect of a child that results in serious impairment of the child's health or development (both physical and mental).

Emotional Abuse: the persistent or severe emotional ill-treatment of a child which has severe adverse effects on the behaviour and emotional development of that child. This may involve serious bullying (including cyberbullying).

Sexual Abuse: the involvement of dependent, developmentally immature children and adolescents in sexual activities they do not truly comprehend, to which they are unable to give informed consent. Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

Grooming: When someone builds an emotional connection with a child or a young person to gain their trust for the purposes of sexual abuse or exploitation.

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE): Where an individual or group uses an imbalance of power to coerce, manipulate or deceive a child into sexual or criminal activity. In some cases, this is in exchange for something the victim wants and may benefit the perpetrator or facilitator (e.g. financially or through increased status).

Self Abuse: Any means by which a child or young person seeks to harm themselves. This can take lots of physical forms, including cutting, bruising, scratching, hair-pulling, poisoning, overdosing and eating disorders.

Peer on peer abuse: Abuse of a child by another child. Examples of this include bullying, physical abuse, sexual violence or harrasment, upskirting (taking a picture under another person's clothing without consent), sexting and initiation/ hazing violence and rituals.

Mental Health Concerns

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, by following this child protection policy and speaking to the designated safeguarding lead or a deputy.

Procedures

In all cases related to child protection and safeguarding, the main procedure is to treat the allegation seriously, in strict confidence and immediately contact the Action Tutoring Designated Safeguarding Officers, and/or allocated school child protection and safeguarding lead/s. In the event of Action Tutoring's Designated Safeguarding Officers being contacted the following protocol will be followed:

1. The information will immediately be passed on to the school's child protection and safeguarding lead/s.
2. The school shall follow the school's procedure for contacting the local Police Child Protection Unit or the Social Services Department of the relevant Local Authority (the Authorities). Action Tutoring shall support the school with any action that the school deems appropriate and shall undertake reasonable endeavours to provide the school with any assistance or documents.
3. Action Tutoring shall not, under any circumstances, undertake any independent investigation or questioning (as this may jeopardise any enquiry) unless or until Action Tutoring is given authorisation by the school or the Authorities. Following authorisation, Action Tutoring may independently follow up on the allegation.
4. All allegations or suspicions shall be referred to the school no matter how insignificant they seem to be or when they occur. Any information about suspicious behaviour or circumstances will be passed to the local Police Child Protection Unit or

the local Social Services within 24 hours or as soon as shall be reasonably practicable.

How to report:

- When a safeguarding concern occurs, volunteer tutors will not promise confidentiality. They will listen carefully to the child and try to remember the key words or phrases used. They will aim to provide an environment that is supportive and respectful. They will not ask leading questions or start to investigate the issue.
- Once a safeguarding concern has occurred, volunteer tutors will contact their Programme Coordinator (PC) as soon as practically possible. If they can't contact their PC they will contact the contacts listed above.
- Action Tutoring staff will listen to the safeguarding concern raised by the volunteer tutor, in an appropriate environment which means only those who need to hear the details of the concern are able to. If a volunteer tutor raises a safeguarding concern in a more public environment (e.g. with other pupils in the room or in a tutor-only debrief session) the PC will ensure a more appropriate environment is found to hear the safeguarding concern, as soon as practically possible.
- The PC will read and/or listen to the safeguarding concern, depending on the format it has been provided in.
- The safeguarding report form will be completed, either by the PC or the tutor, as appropriate.
- The safeguarding report form is emailed to the link teacher, safeguarding lead for the school and safeguarding@actiontutoring.org.uk (the email address for the Action Tutoring DSLs) as soon as practically possible.
- A more detailed internal summary of all Action Tutoring safeguarding procedures is available upon request.

In the event that a young person discloses abuse to an employee of Action Tutoring or a volunteer tutor:

Employees of Action Tutoring and volunteer tutors shall

- Allow the young person to speak without interruption, encouraging them to tell you only what they feel comfortable telling you, and be accepting and be non-judgemental about what is said. Do not ask investigative or leading questions of any kind.
- Advise the young person that you will offer support, but that you **MUST** pass what they tell you and are not able to keep anything they tell you confidential.
- If they refuse to tell you anything unless you promise to keep it a secret, inform them that you want to help and that there is one person you have to tell. If they then refuse to tell you any more, please respect their decision and report this incident.
- Ensure that the young person is not immediately at risk of any further abuse.
- Immediately after a disclosure, contact the Designated Safeguarding Officer at Action Tutoring.

- Report the facts as you know them/ or understand them, including the pupil's name and the account given to you by the young person using the words that they used as well as including any other information your feel is relevant.
- Provide this detailed information to the Designated Safeguarding Officer at Action Tutoring as soon as you are able.
- Action Tutoring shall retain a copy of all such notifications in accordance with GDPR guidelines.

In the event that a volunteer tutor suspects abuse, but it has not been disclosed by the young person:

Employees of Action Tutoring and volunteer tutors shall

- Not discuss your suspicions with the young person in question or conduct any form of investigative work.
- Report the facts as you know them/ or understand them, including the pupil's name and the account given to you by the young person using the words that they used as well as including any other information your feel is relevant.
- Provide this detailed information to the Designated Safeguarding Officer at Action Tutoring as soon as you are able
- Action Tutoring shall retain a copy of all such notifications in accordance with GDPR guidelines.

If you receive an allegation about any adult or about a volunteer tutor (including the person hearing the allegation):

Employees of Action Tutoring and volunteer tutors shall

- Immediately after receiving an allegation or disclosure, contact the Designated Safeguarding Children Officer at Action Tutoring.
- Report the facts as you know them/ or understand them, including the names of relevant adults and/or young people and the account given to you using the words that they used as well as including any other information you feel is relevant.
- Provide this detailed information to the Designated Safeguarding Children Officer at Action Tutoring as soon as you are able.
- Action Tutoring shall retain a copy of all such notifications in accordance with GDPR guidelines.
- Any allegations against Action Tutoring staff will be reported to the Designated Safeguarding Lead and to the Trustee in charge of Safeguarding for investigation. If the allegation is against the Designated Safeguarding Lead then the Action Tutoring AT staff whistleblowing policy should be followed (located on the staff shared area).

When dealing with the personal data of young people (including names, grades and school):

Employees of Action Tutoring and volunteer tutors shall

- Handle all information with sensitivity and confidentiality and in accordance with GDPR guidelines.
- The information should be kept securely and not be made available to others without the authority of Action Tutoring.

Recruitment and Training

Action Tutoring maintains a high standard in recruiting staff and volunteers. All Action Tutoring employees and volunteers will be subject to an enhanced DBS check before they can begin working within our partner schools. Every volunteer and employee must be able to fulfil one of the following:

- Have an existing enhanced DBS check not more than 2 years old verified by a member of Action Tutoring staff, with the disclosure number and date of issue recorded, along with a photographic ID. This DBS must check against the barred children's list and must have 'child workforce' listed.
- Arrange with Action Tutoring to have a new enhanced DBS check processed by Action Tutoring. A new enhanced DBS check is carried out for all paid staff, along with checks on their right to work in the UK and two references collected.

Action Tutoring staff and volunteers receive training on the contents of this policy as part of their induction, this policy is made available to all adults involved in Action Tutoring's activities and all volunteers confirm they have received safeguarding training when they sign up to a programme, confirming that they have received safeguarding training and understand their responsibilities in relation to safeguarding.

Paid Action Tutoring staff receive regular refresher safeguarding training and as part of their induction undertake the NSPCC online 'Introduction to Safeguarding' training as well as receiving specific training from Action Tutoring's Designated Safeguarding Officer or the HR and Safeguarding Manager.

The designated safeguarding lead and any deputies should undergo training to provide them with the knowledge and skills required to carry out the role. The training should be updated every two years.

In addition, all staff should receive regular safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings) as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

Action Tutoring is committed to safer recruitment and the Designated Safeguarding Officer and Deputy Designated Safeguarding Officer have undertaken safer recruitment training. Our 'Recruitment of ex-offenders policy' is available on request.

Action Tutoring will work closely with each partner school to ensure we understand and comply with any specific safeguarding requirements that they may have. We will ask them to share any relevant information or policies that they would like our staff and volunteer tutors to be aware. These could include but are not limited to: behaviour policy, staff code of conduct, tackling extremism and radicalisation, health and safety, complaints, whistleblowing, equality and diversity.

The child's wish: Where there is a safeguarding concern, Action Tutoring encourages governing bodies, proprietors and school or college leaders to take the child's wishes, feelings and point of view into account when determining what action to take and what services to provide.

Action Tutoring adheres to [Keeping Children Safe in Education](#) (September 2020) and this document is key to our safeguarding approach for all staff and volunteer tutors.

Record Keeping

All Action Tutoring safeguarding processes, incidents and documentation will be kept securely with restricted access. For more details on all internal record keeping procedures please contact the DSL directly. A copy of the internal Action Tutoring Safeguarding Manual may be shared upon request.

Code of Conduct

All adults coming into contact with children and young people through Action Tutoring's work must comply with this Child Protection and Safeguarding Children Policy and this Code of Conduct.

You must:

- Act in accordance with the partner school's policies and procedures regarding child protection and safeguarding.
- Treat all young people with respect.
- Avoid being alone with a young person or cause someone else to be alone with a young person because of your actions e.g. being late. If alone in a room with young people keep the door open at all times.
- Remember that someone else might misinterpret your actions, no matter how well intentioned.
- Be aware that any physical contact with a young person can be misinterpreted and should always be avoided. Shaking hands in a public setting is considered acceptable.
- Be aware that social networking sites are in the public domain if not protected by privacy settings. Strongly consider strengthening any privacy settings so that young people

would not be able to access your online profiles and be privy to any information you would not want in the public domain.

- Block any young people that approach you online and inform Action Tutoring's Designated Safeguarding Officer immediately.
- Recognise that special caution is required when discussing sensitive issues with young people.
- Challenge unacceptable behaviour and report all allegations/suspicions of abuse to the Action Tutoring's Designated Safeguarding Officer.
- Operate within Action Tutoring's procedures in the event of any disclosure/concern.
- Raise any questions or concerns about child protection and safeguarding with Action Tutoring's Designated Safeguarding Officer, or if unsure of a school's procedure, information should be sought from school staff.

You must not:

- Promise confidentiality to young people in any situation.
- Seek out or add young people on any social networking site.
- Respond to any online communication from a young person, for example on a social networking site.
- Share any personal contact details^[2] with young people, or, seek out their personal contact details.
- Arrange to meet a young person outside of the allocated tutoring time, unless on the school premises and with the prior knowledge of a member of staff.
- Act in a manner that excludes the young people you are working with.
- Make suggestive or derogatory remarks in front of young people.
- Have inappropriate physical contact or verbal contact with young people.
- Show favouritism to any individual.
- Be under the influence of alcohol or other substances when working on activities involving young people.
- Take photographs of young people.

Online Tutoring (at home and in school)

For all online tutoring completed in the name of Action Tutoring, Action Tutoring will provide:

- Clear staff training in how to monitor child protection and safeguarding in online tutoring sessions.
- Clear tutor (volunteer) training on how to conduct themselves in a safe and appropriate manner throughout online tutoring sessions.
- The safe and limited access storage of all data and recording generated as a result of online sessions. GDPR apply as per the Action Tutoring Data Protection policies found here: <https://actiontutoring.org.uk/privacy-policies/>
- A designated Safeguarding Officer who is responsible for supporting and training all staff and volunteers involved in Action Tutoring's work, ensuring that all Action Tutoring staff and volunteers are sufficiently vetted, acts as the main point of contact in the event of

any allegation or disclosure, acts as the as the main point of contact between Action Tutoring and partner schools.

Online Tutor Code of Conduct

All tutors who volunteer to tutor through Action Tutoring online sessions are required to adhere to the following code of conduct:

- Tutors will only conduct online tutoring with their pupils at the designated tutoring times and dates advertised by Action Tutoring.
- Tutors will conduct online tutoring either in a workplace or location that does not expose personal information or access to inappropriate background content.
- Tutors who are temporarily based abroad for work or educational purposes may request to continue tutoring during their time abroad. Only tutors who will be abroad for 6 weeks or less will be considered. Schools have the right to pause tutoring by tutors who are abroad if it is in conflict with their own school policies.
- Tutors will be dressed appropriately in a manner that would be suitable for their attendance at a school in person.
- Tutors will keep their video stream 'on' and visible for the duration of their sessions.
- Tutors will not record video, still images or audio of any tutoring sessions.
- Tutors will not use the screenshare function.
- Tutors will never disclose their phone, email or other communication details with their pupil nor request their pupils' through the online platform.
- Tutors will conduct their sessions without disruption (mobile phones should be set to silent and away from gaze) or supervision by any other persons not approved by Action Tutoring.
- Tutors will not share any links to online content or websites that contain anything other than educational resources that directly link to the content of their sessions and Action Tutoring workbooks. If in doubt of the validity of any websites or material please get in contact with the Action Tutoring team who need to approve all non-Action Tutoring resources used in sessions.
- Tutors will not take any screenshots of sessions.
- Tutors consent to the recording and safe storage of online sessions for six weeks past the date of recording, unless recordings are deemed to be needed by the Designated Safeguarding Officer. This is for monitoring and safeguarding purposes only.
- Tutors consent to the monitoring of all online sessions by Action Tutoring staff either live during the tutorial or afterwards in a systematic random review of safeguarding procedures.
- Tutors will report any concerns about safeguarding or child protection as well as follow all Action Tutoring safeguarding and child protection procedures outlined in the main text

of the 'Action Tutoring Child Protection and Safeguarding Protection Policy dated May 2019'.

- Tutors will follow any additional requirements as requested by individual school policies regarding digital working.

Online pupil Code of Conduct

All schools who partner with Action Tutoring agree to the following code of conduct for their pupils involved in online sessions:

- Pupils will only receive online tutoring at the designated tutoring times and dates advertised by Action Tutoring, in agreement with their school.
- Pupils who receive online tutoring from their home shall do so with a parent or guardian present in the same room.
- Pupils will be dressed appropriately in either their uniform or appropriate attire for attendance at a school event.
- Pupils who receive online tutoring at school shall do so with a responsible adult present at listening distance.
- Pupils will conduct online tutoring either in a workplace or location that does not expose personal information.
- If broadband speed permits, pupils will keep their video stream 'on' for the duration of their sessions.
- Pupils will have any mobile phones on silent and out of gaze during sessions, or completely away as dictated by their school's policy.
- Pupils will not record video, still images or audio of any tutoring sessions.
- Pupils will never disclose their phone, email or other communication details with their tutor nor request those of their tutor through the online platform.
- Pupils will not share any links to online content or websites that contain anything other than educational resources that directly link to the content of their sessions and Action Tutoring workbooks.
- Pupils will not take any screenshots of sessions.
- Pupils consent to the recording and safe storage of online sessions for six weeks past the date of recording, unless recordings are deemed to be needed by the Designated Safeguarding Officer.
- Pupils consent to the monitoring of all online sessions by Action Tutoring staff either live during the tutorial or afterwards in a systematic random review of safeguarding procedures.

Parent/Guardian and/or Responsible Adult Code of Conduct (for home-based online tutoring):

- Parents/Guardians or the named Responsible Adult of pupil's in receipt of home-based tutoring will remain at home and at 'listening-distance' for the duration of the tutoring session.
- Parents/Guardians or the named Responsible Adult will support their child with basic IT set up, with the support of the Action Tutoring team.
- Parents/Guardians or the named Responsible Adult will support their child to attend and engage in as many online tutoring sessions as possible.
- Only pupils enrolled on the Action Tutoring programme may be involved in online tutoring sessions with Action Tutoring tutors.
- Parents/Guardians or the named Responsible Adult will pass on any concerns about safeguarding immediately to the Programme Coordinator in Action Tutoring or directly to the Designated Safeguarding Lead through safeguarding@actiontutoring.org.uk.
- Parents/Guardians or the named Responsible Adult will ensure a safe, quiet and appropriate environment for online tutoring to take place at home for their child.

This policy will be formally reviewed every year, or in line with Governmental guidance.

^[1] For the purposes of this policy a young person is defined as any person under the age of eighteen.

^[2] Includes email address, telephone number or address.