

Child protection and safeguarding policy



Record of Updates:

January 2021	Jen Fox (Deputy CEO), Jasmin Bemmelen (Head of People and Culture)	Updating regulations in accordance with government guidance (KCSE 2020). Online Tutoring and home tutoring policies
September 2022	Jen Fox (Deputy CEO), Jasmin Bemmelen (Head of People and Culture)	Updating regulations in accordance with government guidance (KCSE 2022)
August 2023	Jen Fox (Deputy CEO), Jasmin Bemmelen (Head of People and Culture)	Updating regulations in accordance with government guidance (KCSE 2023)
October 2023	Maryam Khan (Safeguarding and HR Officer) Jen Fox (Deputy CEO)	Updating regulations in accordance with NTP audit feedback (KCSE 2023)

All children have an absolute right to a childhood free from abuse, neglect or exploitation. The welfare and protection of the young people we work with is central to the way that Action Tutoring work. 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 Action Tutoring's work 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.

Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart.

Designated Safeguarding Officer (DSO)

Action Tutoring has a DSO to:

- Offer support and training to all employees and volunteer tutors involved in Action Tutoring's work.
- Ensure that all Action Tutoring employees and volunteer tutors are sufficiently vetted.
- Act as the main point of contact in the event of any allegation or disclosure.
- Act as the main point of contact between Action Tutoring and partner schools.
- Oversee the filtering and monitoring of the reporting systems in place.

If there is an allegation, if 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 Conduct this information must be passed immediately to Action Tutoring’s DSO. It is the DSO’s responsibility to collect all relevant information and make decisions on how to proceed (this will include contacting the Designated Safeguarding Lead (DSL) at the relevant partner school/s). Volunteer tutors and employees should report all signs, reports and concerns.

DSO	Susannah Hardyman CEO	safeguarding@actiontutoring.org.uk // 0300 102 0094
Deputy DSO	Jen Fox Deputy CEO	safeguarding@actiontutoring.org.uk
Head of People and Culture	Jasmin Bemmelen	safeguarding@actiontutoring.org.uk
Safeguarding and HR Officer	Maryam Khan	safeguarding@actiontutoring.org.uk
Safeguarding Trustee	Jo Conduit	hello@actiontutoring.org.uk
Safeguarding email		safeguarding@actiontutoring.org.uk

In the event of the DSO being unavailable please email one of the contacts listed above, or call the above telephone number.

Forms of abuse

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 by other children or adults, in a family or in an institutional or community setting by those known to them or, more rarely, by others.

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

The main forms of abuse are:

Physical abuse: A form of abuse that may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child.

Emotional abuse: 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, inadequate, or valued only insofar as they meet the needs of another person. It may involve bullying (and cyberbullying). Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

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. The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) in education.

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).

Child Sexual Exploitation and Criminal Exploitation are forms of child abuse and can include:

Sexual violence and sexual harassment: This can occur between two or more children of any age and sex, from primary through to secondary stage and into college. It can also include a group of children sexually assaulting or sexually harassing a single child or group of children.

Female Genital Mutilation: This comprises of all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Grooming: Children and young people can be groomed online, in person or both — by a stranger or someone they know. This could be a family member, a friend or someone who has targeted them, like a teacher, faith group leader or sports coach.

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

Child on child abuse: Abuse of a child by another child. Examples of this include bullying (including cyberbullying, prejudice-based and discriminatory bullying) physical abuse, sexual violence or harassment, upskirting (taking a picture under another person's clothing without consent), sexting and initiation or hazing violence and rituals.

Domestic abuse: This can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional.

Mental health concerns

All employees 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 employees 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.

Serious violence: These may lead to increased absence from school or college, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries.

Radicalisation: This can present as extremism which includes active opposition to fundamental values such as democracy, rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Radicalisation can lead to involvement in terrorism. An individual's susceptibility to radicalisation may be linked to their vulnerability. Though it is important to note, not all people susceptible to radicalisation will be vulnerable.

In relation to pupils with special educational needs, it should not be assumed that indicators of possible abuse such as mood and/or injury is related to the pupils condition and should be reported as safeguarding concerns.

Procedures

In all cases related to child protection and safeguarding, the main procedure for Action Tutoring staff is to treat the allegation seriously, in strict confidence and immediately contact the Action Tutoring DSOs, and/or allocated school child

protection and safeguarding lead(s). In the event that Action Tutoring's DSOs are contacted the following protocol will be followed:

1. The information will immediately be passed on to the school's DSLs.
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). If the case relates to radicalisation, a referral should also be made to the police. Action Tutoring shall support the school with any action that the school deems appropriate and shall undertake reasonable action 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, disclosures 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, the local Social Services or the local police team within 24 hours or as soon as shall be reasonably practicable.

How to report:

Procedure:

- When a safeguarding concern or disclosure occurs, volunteer tutors will not promise confidentiality.¹ 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. Pupils with special educational needs may have communication barriers and difficulties in reporting these challenges.

¹ If the child does not give consent to share information, volunteer tutors and employees may still lawfully share it, if it's in the best interest of the child.

- Once a safeguarding concern has occurred, volunteer tutors will contact their Programme Coordinator (PC) as soon as practicably possible. If they can't contact their PC they will contact those listed above.
- Action Tutoring employees 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 practicably possible.
- The PC will read and/or listen to the safeguarding concern, depending on the format it has been provided in.
- All pupil absences are recorded in Action Tutoring's database and the PC will inform the school of any absences through their weekly email updates.
- The safeguarding report form will be completed, either by the PC or the volunteer tutor, as appropriate.
- The safeguarding concern/incident will be emailed to the link teacher, DSL for the school and safeguarding@actiontutoring.org.uk as soon as practicably 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 on 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 PC (for volunteer tutors)/DSO at Action Tutoring (for employees).
- Report the facts as you know 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 you feel is relevant.
- Provide this detailed information to the PC (for volunteer tutors)/DSO (for employees) at Action Tutoring as soon as you are able.
- Action Tutoring shall retain a copy of all such notifications in accordance with GDPR guidelines.
- Action Tutoring has a legal duty to make a referral to the Disclosure and Barring Service (DBS) where they consider an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child.

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.
- In relation to pupils with special educational needs, it should not be assumed that indicators of possible abuse such as mood and/or injury is related to the pupils condition and should be reported as safeguarding concerns.
- Report the facts as you know 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 you feel is relevant.

- Provide this detailed information to the PC (for volunteer tutors)/the DSO (for employees) 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, including Action Tutoring staff 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 PC (for volunteer tutors)/DSO (for employees) at Action Tutoring.
- Report the facts as you know 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 PC (for volunteer tutors)/the DSO (for employees) at Action Tutoring as soon as you are able to.
- Action Tutoring shall retain a copy of all such notifications in accordance with GDPR guidelines.
- Any allegations against Action Tutoring employees will be reported to the DSO and to the Trustee in charge of Safeguarding for investigation. If the allegation is against the DSO then the Action Tutoring Employees Whistleblowing Policy should be followed.

When dealing with the personal data of young people (including names, academic year group 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.

Duty of care towards our volunteer tutors and employees

Action Tutoring must:

- Manage and minimise the stress caused by any allegation made about an individual.
- Inform the individual as soon as possible if an allegation has been made against them, explaining the likely course of action, guided by the Local Authority Designated Officer (LADO), and the police where necessary.
- Advise the individual to contact their trade union representative, or a colleague for support.
- Keep the individual informed about the progress of the case.
- Provide access to counselling or medical advice where appropriate for employees. In the case of volunteer tutors, point them towards sources of help.
- Not prevent social contact with work colleagues and friends when an employee is suspended, unless there is evidence to suggest this may prejudice the gathering of evidence.

Safer Recruitment and training

Action Tutoring maintains a high standard in recruiting employees and volunteer tutors. When recruiting paid employees, each interview panel contains at least one member who is trained in Safer Recruitment practices. All Action Tutoring employees working closely with pupils and volunteer tutors will be subject to an enhanced DBS check before they can begin working within our partner schools. All employees without direct contact have a basic DBS check. All individuals are checked against the Barred List for working with children.

Every volunteer tutor must be able to fulfill one of the following:

- Have an existing enhanced DBS check which is not more than two years old verified by an Action Tutoring employee, with the disclosure number and date of issue recorded, along with a photographic ID. This DBS must check against the children's Barred List and must have 'child workforce' listed.

If a volunteer tutor is on the DBS update service, before using this service, Action Tutoring must:

- Obtain consent from the individual to carry out an online check to view the status of an existing enhanced DBS check.
- Confirm the DBS certificate matches the individual's identity.
- Examine the original certificate to ensure that it is valid for employment with the children's workforce.
- Arrange with Action Tutoring to have a new enhanced DBS check processed by Action Tutoring.

Additionally, all volunteer tutors are vetted in line with the processes and procedures set out in Keeping Children Safe in Education 2023. This includes the appropriate checks for safer recruitment.

- All our volunteer tutors have had their ID checked, including either a passport or photo driving license with proof of address.
- All our volunteer tutors have had their date of birth checked.
- All our volunteers have completed a detailed application form that outlines their education history, grades, current employer (if applicable), their current address, a range of personal identifiers and an option to declare:
 - If they have lived abroad for more than six months in the last five years,
 - If they would like to declare any convictions,
 - If they have mental and physical fitness to carry out their volunteer responsibilities.
- If our recruitment team is satisfied that they pass our high qualification and motivation standards, they are invited to attend our initial tutor training, including a thorough section about safeguarding. If we are unsure about any element of their application, they are invited to a video interview.
- A risk assessment is conducted by our safeguarding team for volunteer tutors with a conviction on their Enhanced DBS certificate.
- After attending training, all volunteer tutors submit the appropriate ID for us to run an Enhanced DBS check.

- All our volunteers are checked against the 'Prohibited from Teaching' list.
- Action Tutoring must receive two satisfactory references for all tutors.
- All volunteer tutors that have lived or worked overseas for six months or more in the past five years have provided either an overseas criminal record check or a letter of good conduct, or a risk assessment has been done.
- Our volunteer tutors are supervised at all times.

Additionally, every employee must be able to fulfill the following:

- Arrange with Action Tutoring to have a new DBS check suitable for their role processed by Action Tutoring.
- Complete checks regarding their right to work in the UK.
- Online searches may be done as part of due diligence checks.
- Provide two references deemed to be satisfactory.
- For employees that have lived or worked overseas for six months or more in the past five years, provide either an overseas criminal record check or a letter of good conduct. In the event that the employee cannot provide any of these, Action Tutoring will complete a risk assessment.

Action Tutoring employees 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. All volunteer tutors confirm they have received safeguarding training when they sign up to a programme, and understand their responsibilities in relation to safeguarding.

Employees receive regular refresher safeguarding training which includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring. As part of our staff induction and then on a yearly basis, employees undertake the NSPCC online 'Introduction to Safeguarding' training and receive specific training from Action Tutoring's DSO or the Head of People and Culture.

Action Tutoring is subject to the Prevent Duty and all new staff members are required to complete Prevent training within their induction period.

The DSO 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 employees receive regular safeguarding and child protection updates (for example, via email, e-bulletins, employee 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 DSO, Deputy DSO, Head of People and Culture and Safeguarding and HR 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 employees and volunteer tutors to be aware of. These could include but are not limited to: volunteer code of conduct, employee 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 2023) and this document is key to our safeguarding approach for all employees and volunteer tutors.

Record keeping

All Action Tutoring safeguarding processes, incidents and documentation will be kept securely with restricted access. These will be monitored and filtered on a yearly basis. For more details on all internal record keeping procedures please contact the DSO 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, safeguarding and bullying.
- Treat all young people with respect.
- Avoid being alone with a young person or causing someone else to be alone with a young person because of your actions (e.g. by 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 DSO immediately.
- Recognise that special caution is required when discussing sensitive issues with young people.
- Challenge unacceptable behaviour and report all allegations or suspicions of abuse to the Action Tutoring's DSO.
- Report bullying (including cyberbullying, prejudice-based and discriminatory bullying) to Action Tutoring's DSO.
- Operate within Action Tutoring's procedures in the event of any disclosure or concern.

- Raise any questions or concerns about child protection and safeguarding with Action Tutoring's DSO, or if unsure of a school's procedure, information should be sought from school employees.

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 with young people,² 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 an employee.
- Act in a manner that excludes any of the young people you are working with.
- Make suggestive or derogatory remarks in front of young people.
- Engage in bullying (including cyberbullying, prejudice-based and discriminatory based bullying).
- Have inappropriate physical contact or verbal contact with young people.
- Show favouritism to any individual.
- Be under the influence of alcohol or drugs, or be seen smoking including e-cigarettes or any other substance not permitted to under-18s.
- Take photographs of young people.
- According to the Equality Act, you must not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics). Please find our full Diversity and Inclusion tutor code of conduct [here](#).

² Includes email address, telephone number or address.

Online and virtual tutoring (at home and in school)

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

- Resource templates for tutors to use. We allow tutors to create their own resources for up to 25% of the session but this must be approved by a programme coordinator.
- Clear employee 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 recordings generated as a result of online sessions. GDPR applies as per the Action Tutoring Data Protection policies found here: <https://actiontutoring.org.uk/privacy-policies/>
- A DSO who is responsible for supporting and training all employees and volunteers involved in Action Tutoring's work, ensuring that all Action Tutoring employees and volunteers are sufficiently vetted, acts as the main point of contact in the event of any allegation or disclosure, acts as the main point of contact between Action Tutoring and partner schools.

All online and virtual sessions take place on Vedamo. Vedamo settings are restricted to only allow videos from designated sites to be shared to ensure filtering and monitoring of content shared with pupils. Action Tutoring adheres to the filtering and monitoring procedures set by the schools based on their firewall rules and settings.

Online and virtual tutor code of conduct

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

- Volunteer tutors will only conduct online tutoring with their pupils at the designated tutoring times and dates advertised by Action Tutoring.

- Volunteer tutors will conduct online tutoring either in a workplace or location that does not expose personal information or access to inappropriate background content.
- Volunteer tutors who are temporarily based abroad for work or educational purposes may request to continue tutoring during their time abroad. Only Volunteer tutors who will be abroad for six 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.
- Volunteer tutors will be dressed appropriately in a manner that would be suitable for their attendance at a school in person.
- Volunteers must not be under the influence of alcohol or drugs, or be seen smoking including e-cigarettes or any other substance not permitted to under-18s in the virtual classroom.
- Volunteer tutors will keep their video stream 'on' and visible for the duration of their sessions.
- Volunteer tutors will not record video, still images or audio of any tutoring sessions.
- Volunteer tutors will not use the screenshare function.
- Volunteer tutors will never disclose their phone, email or other communication details with their pupils nor request their pupils' details through the online platform.
- Volunteer 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.
- Volunteer 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.
- Volunteer tutors will not take any screenshots of sessions.

- Volunteer 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 DSO. This is for monitoring and safeguarding purposes only.
- Volunteer tutors consent to the monitoring of all online sessions by Action Tutoring employees either live during the tutorial or afterwards in a systematic random review of safeguarding procedures.
- Volunteer 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 September 2023'.
- 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 DSO.
- Pupils consent to the monitoring of all online sessions by Action Tutoring employees 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 pupils in receipt of home-based tutoring will remain at home and within '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 PC in Action Tutoring or directly to the DSO 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.

Legal background

Where a person aged 18 or over is in a position of trust with a child under 18, it is an offense under the Children Act 1989 for that person to engage in sexual activity with or in the presence of that child, or to cause or incite that child to engage in or watch sexual activity.

Where a person aged 18 or over is in a position of trust with a pupil who has already reached the age of 18, any attempt to engage in sexual activity with that person will be treated as a breach of trust and will be treated as gross misconduct.

Where a person aged 18 or over is in a position of trust established with a person who has only recently left the school, any attempt to engage in sexual activity with that person will be a cause for concern and may be treated as a breach of trust established in that prior relationship and could be regarded as gross misconduct.

This means that staff and volunteer tutors must not:

- Use their position to gain access to information about pupils for their own advantage.
- Use their power to intimidate, threaten, coerce or undermine pupils.
- Use their status and standing to form or promote a relationship with a pupil of a school, which is of a sexual nature.

There are occasions when adults embark on a course of behaviour known as 'grooming' where the sole purpose is to gain the trust of the pupil and manipulate that relationship so sexual abuse can take place. This is an offense and Action Tutoring or the school will take immediate action with the relevant authorities.

Any sexual behaviour by a representative of Action Tutoring with or towards a pupil is both inappropriate and illegal. Pupils are protected by the same laws as adults in relation to non-consensual sexual behaviour. They are additionally protected by specific legal provisions regardless of whether the child or young person whether or not the adult perceives the child to have consented. This includes specific prohibitions addressed to adults in positions of trust and authority.

Power and positions of trust

All adults working with pupils in education settings are in positions of trust in relation to the young people in their care. A relationship between a member of staff and a pupil cannot be a relationship between equals, therefore staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

Although not a permanent member of staff in the schools you visit, when working on Action Tutoring's programmes in schools (or in other locations), you will be viewed by the young people you are working with as someone in a position of power and trust like their teachers and other school staff.

School staff must always maintain appropriate professionalism and wherever possible they must avoid behaviour which might be misinterpreted by others, and report and record any incident with this potential.

We therefore have a similar expectation in the standard of conduct we would expect from you and want to ensure you are fully aware of this best practice to prevent any misinterpretation of your actions. This can also include some expected behaviours outside of school that need to be upheld. In particular, criminal offenses that involve violence or possession or use of illegal drugs or sexual misconduct are likely to be regarded as unacceptable and could lead to dismissal.

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