

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, Keeping Children Safe in Education (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 the National Tutoring Programme (NTP) audit feedback (KCSE 2023)
August 2024	Amelia Weiss (Safeguarding and HR Officer, Maternity Cover) Jasmin Bemmelen (Head of People and Culture)	Updating regulations in accordance with government guidance (KCSE 2024)
July 2025	Maryam Khan (Safeguarding and HR Officer) Jasmin Bemmelen (Head of People and Culture)	Updating regulations in accordance with government guidance (KCSE 2025)
February 2026	Jasmin Bemmelen (Head of People and Culture)	Including accepted criminal record checks
August 2026	Freya Natt (HR and Safeguarding Officer) Jasmin Bemmelen (Head of People and Culture)	Updating regulations in accordance with government guidance (KCSE 2026)

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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 Action Tutoring works. 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 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 child's best interests at heart.

Designated Safeguarding Officer (DSO)

Action Tutoring has a Designated Safeguarding Officer (DSO) to:

- Offer support and training to all employees and volunteer tutors involved in Action Tutoring's work.
- Ensure 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.

Action Tutoring ensures it keeps detailed, accurate and secure written records of all concerns, discussions, and decisions made, including the rationale for those decisions. We recognise it may be necessary to refer concerns to the independent Local Authority Designated Officer, social services and the police.

Action Tutoring Safeguarding team:

- **Designated Safeguarding Officer (DSO):** Alice Nelson (Director of Programmes)
- **Deputy DSO:** Jasmin Bemmelen (Head of People and Culture).
- **Safeguarding and HR Officer:** Freya Natt
- **Safeguarding Trustee:** Claire Robins

For any safeguarding concerns, please contact:

Email: safeguarding@actiontutoring.org.uk, or, phone: 0300 102 0094 . Our out of hours phone is: 07775 077781.

Types of abuse and harm

Abuse: Abuse is 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. Harm can include ill treatment that is not physical, as well as the impact of witnessing ill treatment of others, including where they see, hear or experience its effects. Abuse can take place wholly online, or technology - including Generative AI - may be used to facilitate offline abuse. They may be abused by an adult or adults, or another child or children.

The main types of abuse and harm are:

Physical abuse: Physical injury to a child where there is knowledge, or a reasonable suspicion, their injury was inflicted or knowingly not prevented. This may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child.

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 include verbal abuse, such as persistent criticism, belittling or name-calling, as well as serious bullying (including cyberbullying). It is also known as psychological abuse. It may involve conveying to a child they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. Some level of emotional abuse is involved in all types of a child's maltreatment, 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: Neglect is the ongoing failure to meet a child's basic needs. It is the most common form of child abuse. The four main types of neglect are physical neglect, educational neglect, emotional neglect and medical neglect.

Grooming: Grooming is when someone builds a relationship, trust and emotional connection with a child or young person so they can manipulate, exploit and abuse them. Children and young people who are groomed can be sexually abused, exploited or trafficked. 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.

Child sexual exploitation (CSE): Child sexual exploitation (CSE) is a type of sexual abuse. When a child or young person is exploited, they are given things such as gifts, drugs, money, status and affection, in exchange for performing sexual activities. Children and young people are often tricked into believing they're in a loving and consensual relationship. This is called grooming. They may trust their abuser and not understand they're being abused.

Child criminal exploitation (CCE): Child criminal exploitation is where children and young people are manipulated and coerced into committing crimes.

Female genital mutilation (FGM): This includes 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.

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.

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 (including harassment and violence): Abuse of a child by another child. This can happen in person or online and includes bullying (including cyberbullying, abuse in intimate personal relationships between children, prejudice-based and discriminatory bullying), physical abuse (or threat of harm with a weapon), sexual violence or harassment, consensual and non-consensual making or sharing of nudes and semi-nudes (including those generated using AI e.g. deepfakes), upskirting (taking a picture under another person's clothing without consent), sexting and initiation or hazing violence and rituals. Child-on-child abuse is a safeguarding concern for both the child who has experienced the abuse and the child displaying the harmful behaviour.

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.

Serious violence: This 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.

Mental health concerns: All employees should also be aware mental health problems can, in some cases, develop into safeguarding concerns. They may also be an indicator a child has suffered, or is at risk of suffering abuse, neglect or exploitation.

Employees should be alert to potential warning signs, including significant changes in behaviour, ongoing difficulty sleeping, withdrawing from social situations, not wanting to do things they usually enjoy and physical signs of self-harm or neglecting themselves.

If an employee or volunteer tutor has a concern about a child's mental health that is also a safeguarding concern, immediate action should be taken by following this Child Protection and Safeguarding policy. This includes speaking to the DSO or Deputy DSO.

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.

Online risks: All employees should be aware of the risks posed by being online. The four areas of online risks are content, contact, conduct and commerce. This includes emerging threats from Generative AI technology, such as the creation and sharing of AI-generated deepfakes or images, AI-enabled grooming, or misinformation. Standard child protection procedures apply to any abuse linked to AI and staff should treat this with the same urgency as real-world abuse.

Procedures

In all cases related to child protection and safeguarding, Action Tutoring employees' main procedure is to treat the allegation seriously, in strict confidence and, to immediately contact the Action Tutoring designated DSO, and/or allocated school child protection and safeguarding lead(s).

If Action Tutoring's DSO is contacted, the following protocol will be followed:

1. The information will immediately be passed on to the school's Designated Safeguarding Leads (DSLs).
2. If relevant, the school shall follow the school's procedure for contacting the local police Child Protection Unit or the social services department or 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 a supportive and respectful environment. 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.
- Once a safeguarding concern has occurred, tutors must inform their Programme Coordinator (PC) as soon as practicably possible. In a in-person tutoring session, a tutor may also inform the school directly if their PC is unavailable. If the tutor cannot contact their PC, they should immediately contact the Safeguarding Team using the details provided 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. For extreme concerns, the PC will request the volunteer tutor to complete a safeguarding incident form.
- The PC will use the employee safeguarding reporting form to submit the concern to the Safeguarding Team. The Safeguarding Team will review the report within 24 hours of receipt. In a separate but simultaneous action, the school should be notified verbally and/or in writing.
- The PC will contact the link teacher if no further action is required, or Action Tutoring's DSO will escalate if required.
- 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.

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.

- Any safeguarding reports made retrospectively, as a result of reviewing online sessions, will be raised with the safeguarding team and school as soon as possible.
- A more detailed internal summary of all Action Tutoring safeguarding procedures is available upon request.

If a young person discloses abuse to an Action Tutoring employee or a volunteer tutor:

Action Tutoring employees 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 non-judgemental about what is said. They will 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 unable to keep anything they tell you confidential.
- If they refuse to tell you anything unless you promise to keep it a secret, inform them you want to help and you have to share their concerns. If they then refuse to tell you any more, please respect their decision and report this incident.
- Ensure the young person is not immediately at risk of any further abuse.
- Immediately after a disclosure, contact the PC (for volunteer tutors)/ Action Tutoring's DSO (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. Please use the words they used, as well as including any other information you feel is relevant.
- Provide this detailed information to the PC (for volunteer tutors)/Action Tutoring's DSO (for employees) 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) or local authority 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.

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

Action Tutoring employees and volunteer tutors shall:

- Not discuss your suspicions with the young person in question or conduct any form of investigative work.
- Remember that in relation to pupils with special educational needs, it should not be assumed that possible abuse indicators - such as mood and/or injury - are related to the pupil's 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. This includes using the words they used, as well as recording any other information you feel is relevant.
- Provide this detailed information to the PC (for volunteer tutors)/Action Tutoring's DSO (for employees) as soon as you are able.
- Note Action Tutoring will retain a copy of all such notifications in accordance with GDPR guidelines.

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

Action Tutoring employees and volunteer tutors shall:

- Immediately after receiving an allegation or disclosure, contact the PC (for volunteer tutors)/Action Tutoring's DSO (for employees).
- Report the facts as you know or understand them, including relevant adults' and/or young people's names and the account given to you using the words 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 can.

- Note Action Tutoring will retain a copy of all such notifications in accordance with GDPR guidelines.
- Remember that any allegations against Action Tutoring employees will be reported to the DSO and the trustee in charge of safeguarding for investigation. If the allegation is against the DSO then the Action Tutoring Employees Whistleblowing and Disciplinary policy should be followed.

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

Action Tutoring employees and volunteer tutors shall:

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

Record keeping

All Action Tutoring safeguarding processes, incidents and documentation will be kept securely with restricted access. These will be monitored and filtered yearly. Action Tutoring's systems meet the Cyber Essentials standards. For more details on all internal record keeping procedures, please contact the DSO directly. A copy of the internal Action Tutoring Safeguarding Handbook may be shared upon request.

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 for Action Tutoring employees.
- Keep the individual informed about the progress of the case.
- Provide counselling access 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 reason to suggest this may prejudice evidence gathering.

Safer Recruitment and training

Action Tutoring maintains a high standard in recruiting employees and volunteer tutors. When recruiting 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 Disclosure and Barring Service (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.

Under no circumstances will we allow an unchecked employee or volunteer tutor to have unsupervised contact with children.

All volunteer tutors are required to hold an Enhanced DBS certificate with Children's Barred List information before commencing their role with Action Tutoring. Volunteers must meet one of the following requirements:

- An existing enhanced DBS check, not more than two years old, verified by an Action Tutoring Safeguarding team member, 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.
- 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 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 Keeping Children Safe in Education 2026 guidance processes and procedures.

This includes the following appropriate checks for safer recruitment:

- All our volunteer tutors have had their ID checked in line with government guidelines.
- All our volunteer tutors have had their date of birth checked.
- All our volunteer tutors have completed a detailed application form outlining 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 the mental and physical fitness to perform their volunteer tutor responsibilities.
- If our Recruitment team is satisfied that they pass our high qualification and motivation standards, they are invited to attend Action Tutoring's Initial Tutor Training (ITT), which includes a thorough section about safeguarding. If we are unsure about any element of their application, they are invited to a video interview by the Tutor Journey Team.
- After attending training, all volunteer tutors submit the appropriate ID for us to run an enhanced DBS check.
- A risk assessment is conducted by our Head of People and Culture or HR and Safeguarding Officer for volunteer tutors with a conviction on their Enhanced DBS certificate.
- Two satisfactory references are obtained.

- Most volunteers are supervised at all times, however in some cases, programmes are allowed to happen without the Programme Coordinator there. This is agreed in advance with the Programme Manager and the school.
- On rare occasions, the DBS information for a cover tutor may be shared with the school after the 48 hour window or after the session. This is agreed in advance with the school.

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

- Arrange with Action Tutoring to have a new DBS check suitable for their role processed by Action Tutoring. This will be an enhanced DBS for staff members not in regulated activity with children, but who choose to tutor more than once a month.
- Right to work in the UK checks.
- Two satisfactory references are obtained.
- All employees who have lived or worked overseas for six months or more in the past five years have provided either an overseas criminal record check, a letter of good conduct or participated in a risk assessment. Online searches may be done as part of due diligence checks.

Accepted criminal record checks and territorial eligibility

To ensure the highest standards of safeguarding, Action Tutoring applies specific criteria to the types of criminal record checks accepted, based on the volunteer tutor's location and the jurisdiction of the recruitment decision.

UK Mainland and Northern Ireland

As Action Tutoring is headquartered in England, all recruitment suitability decisions are made within this jurisdiction (more information can be found [here](#)). Consequently, we only process and accept **DBS checks** for our volunteer tutors.

- **Tutors in England and Wales:** All tutors must undergo an Enhanced DBS check processed by Action Tutoring or provide a valid pre-existing certificate.

- **Tutors in Northern Ireland:** We accept applications from tutors based in Northern Ireland. We can accept pre-existing Access NI certificates that are enhanced. Alternatively, because the suitability decision is made by Action Tutoring in England, Action Tutoring can issue an enhanced DBS certificate for these volunteer tutors following our normal procedures.
- **Tutors in Scotland:** Action Tutoring does not process Disclosure Scotland checks as we do not operate in or support schools within that jurisdiction.

While DBS checks can be processed for volunteer tutors living overseas, they may not provide a complete criminal history. Action Tutoring is therefore unable to accept volunteer tutor applications from **Gibraltar** or the **Republic of Ireland**.

All volunteer tutors are required to provide a current, verifiable UK residential address, regardless of their DBS status or any specific DBS address proof requirements.

Safeguarding training

Action Tutoring employees and volunteer tutors 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 concerning safeguarding.

Volunteer tutors are invited to redo safeguarding training in the following situations:

- For allocated volunteer tutors who attended Initial Tutor Training (ITT) two years ago, they must complete safeguarding refresher training on 360Learning. This is because safeguarding training must be renewed every two years.
- For volunteer tutors who didn't tutor within six months of completing ITT, and then sign up to a programme, they must complete safeguarding refresher training on 360Learning.
- For volunteer tutors who last tutored between one and two years ago, who then sign up to a programme, they must complete safeguarding refresher training on 360Learning.
- If a volunteer tutor completed ITT over two years ago and never tutored or

hasn't tutored in over two years, they must repeat ITT.

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 employee induction, 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. The programme team are then requested to refresh this training yearly, whilst all other employees refresh it every two years.

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. In addition, at least annually, they are provided with relevant skills and knowledge to safeguard children effectively.

Action Tutoring is committed to safer recruitment and all members of the Safeguarding team and Senior Management team have undertaken safer recruitment training. Our 'Recruitment of ex-offenders policy' is available on request.

Prevent Duty

We are aware of the Prevent Duty under Section 26 of the Counter Terrorism and Security Act 2015 to protect young people from being drawn into terrorism and prevent radicalisation.

All Safeguarding and Programme team members have completed Prevent training. Action Tutoring employees understand the need for a culture of vigilance to be present in the school to support safeguarding. This includes awareness and sensitivity to pupils' attitude changes, which may indicate they are at risk of radicalisation.

Our commitment to safeguarding children

Action Tutoring will work closely with each partner school to ensure we understand and comply with any specific safeguarding requirements they may

have. We will ask them to share any relevant information or policies they would like our employees and volunteer tutors to be aware of.

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 views into account when determining what action to take and what services to provide.

Action Tutoring adheres to [Keeping Children Safe in Education](#) (September 2026) guidance. This document is key to our safeguarding approach for all employees and volunteer tutors.

Code of conduct

All adults making 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 and communicate with your Programme Coordinator if you are late or unable to make the session.
- Remember, 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. A handshake or an occasional high five can be suitable, but ensure the young person feels comfortable with these gestures.

- Be aware that social networking sites are in the public domain if not protected by privacy settings. Strongly consider strengthening any privacy settings so 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 who approach you online and inform Action Tutoring's DSO or PC 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, who will escalate.
- Challenge and report misinformation, disinformation and conspiracy theories which could be from exposure to illegal, inappropriate or harmful content online.
- Report bullying (including cyberbullying, prejudice-based and discriminatory bullying) to Action Tutoring's DSO.
- Be aware of and report potential online harms such as making or sharing of nudes and semi-nudes (including AI-generated deepfakes), pornography and misogynistic influencers.
- Operate within Action Tutoring's procedures in the event of any disclosure or concern.
- Raise any child protection and safeguarding questions or concerns with Action Tutoring's DSO. Or, if unsure of a school's procedure, information should be sought from school employees.
- Comply with the standard of behaviours.
- Conduct their sessions without disruption from mobile phones and other electronic devices. These should be set to silent and away from the gaze.

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 an employee's prior knowledge.
- Act in a manner excluding 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 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.
- Unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics).
- Promote private tutoring sessions with themselves at any time.

Standards of behaviours

In accordance with the [Equality Act](#), we expect everyone involved with Action Tutoring to adhere to the following standard of behaviour:

- Treat all employees, volunteer tutors and pupils equally regardless of the protected characteristics (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, or sexual orientation).

² Includes email address, telephone number or address.

- Be aware that those around you, including pupils, may have hidden disabilities.
- Understand and behave in accordance with Action Tutoring's anti-racism and inclusion commitment.
- Avoid making assumptions about others based on their gender, ethnicity, or national origin.
- Avoid asking pupils, volunteer tutors, or staff about their family background or heritage. Such questions, like "Where are you from originally?", or, "Where are you really from?", can make individuals feel different, out of place, or unwelcome.
- Ask pupils, volunteer tutors and employees how their name is pronounced if you're not sure, rather than guessing or using a shortened version.
- Recognise pupils, volunteer tutors or employees may come from a range of cultural backgrounds and may speak English as an additional language.
- Be aware pupils, volunteer tutors or employees may also have differences in how they communicate.
- Avoid making negative comments about pupils', volunteer tutors', or employees' hobbies or interests. All pupils should be valued for bringing different and diverse assets to the sessions³.
- Avoid commenting on pupils', volunteer tutors', or employees' physical appearance.
- Respect other pupils', volunteer tutors' and employees' pronouns and gender identity. Pupil's name and/or pronouns should be used as confirmed or directed by the school. Under KCSIE guidance, schools do not initiate social transition and will actively involve parents or carers as a priority before agreeing to any changes. The school may have agreed to use a name only and not pronouns. If a pupil makes a request for a change to how to refer to them using a different name or pronoun, volunteer tutors and employees should not action this independently and should instead refer the matter to the PC for escalation to the school.

³ For example, a child showing dislike to reading can be due to factors such as home environments and confidence in their own reading ability, as well as their caregivers'. Find research [on making positive and inclusive environments in reading](#).

- Report any discriminatory, harassing, offensive, or otherwise unwelcome comments or behaviours.

Action Tutoring will:

- Provide any reasonable adjustments you need to perform the duties of your role.
- Not tolerate discriminatory behaviour towards our staff or volunteer tutors from pupils or school staff.
- Use your pronouns to refer to yourself. Pupils will be asked to call employees and volunteer tutors by their first name, rather than 'Sir' or 'Miss'.
- Provide support with challenging biases or discriminatory views that may arise during sessions or at work.
- Provide support with managing sensitive topics which may appear in sessions.⁴
- Inform you whether one or more of the pupils you are working with has a disability or additional need which may affect their learning, e.g. ADHD, dyslexia, dyscalculia or autism. However, please be aware schools may choose not to share this information with Action Tutoring.
- Provide you with additional support when working with pupils with disabilities or different learning needs.⁵

Online and virtual tutoring (at home and in school)

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

⁴ You may find it helpful to review our course, ['Managing conversations about prejudice, stereotypes and inequality'](#).

⁵ [Bright Ideas: Different learning needs](#) gives a wide range of tips for supporting pupils with focusing, processing information and managing their emotions. [Bright Ideas: Dyslexia](#) contains helpful strategies.

- Resource templates for volunteer tutors to use. We allow volunteer 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 training on how volunteer tutors can conduct themselves in a safe and appropriate manner throughout online tutoring sessions.
- The safe and limited-access storage of all data and recordings generated from online sessions. GDPR applies as per the [Action Tutoring Data Protection policies](#).
- A Designated Safeguarding Officer (DSO) who is responsible for supporting and training all employees and volunteers involved in Action Tutoring's work. They will ensure all Action Tutoring employees and volunteer tutors are sufficiently vetted, while acting as the main point of contact in the event of any allegation or disclosure, and 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. This ensures 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 volunteer tutors who tutor voluntarily through Action Tutoring via 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 must not use blurred or virtual backgrounds during sessions on Vedamo.

- Volunteer 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 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 not vape or smoke in the virtual classroom.
- Volunteer tutors will be dressed appropriately in a manner that would be suitable for their attendance at a school in-person.
- 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 never disclose their phone, email or other communication details with their pupils, nor request pupil 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 containing anything other than educational resources directly linking to their sessions' content and Action Tutoring workbooks. It is important that tutors get their Programme Coordinator's approval for links and non-Action Tutoring related resources before being used in a session.
- Volunteer tutors will not take any screenshots of sessions.
- Volunteer tutors will not have others, including dependents, in the background during tutoring 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 Designated Safeguarding Officer (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 are expected to use respectful and inclusive language at all times.
- Volunteer tutors will follow any additional requirements as requested by individual school policies regarding digital working.
- Volunteer tutors will report any safeguarding or child protection concerns, as well as follow all Action Tutoring safeguarding and child protection procedures outlined in the main text.

Online pupil code of conduct

All Action Tutoring partner schools 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 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 a 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 their mobile phones on silent and out of sight 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 volunteer tutor nor request those of their tutor through the online platform.
- Pupils will not share any links to online content or websites containing anything other than educational resources that directly link to their session content 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 recording date, unless recordings are deemed to be needed by the DSO.
- All pupils are expected to use respectful and inclusive language at all times.
- 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.

Legal background

Where a person aged 18 or over is in a position of trust with a child under 18, it is an offence under the Children Act 1989:

- For that person to engage in sexual activity with or in the presence of that child.
- 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 18-years-old, any attempt to engage in sexual activity with that person will be treated as a breach of trust. In addition, it 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. In addition, it may be treated as a breach of trust established in that prior relationship and could be regarded as gross misconduct.

This means employees and volunteer tutors must not:

- Use their position to gain access to pupils' information 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 behaviour known as 'grooming'. The sole purpose is to gain a pupil's trust and manipulate that relationship so that sexual abuse can occur. This is an offence and Action Tutoring or the school will take immediate action with the relevant authorities.

Any sexual behaviour by an Action Tutoring representative 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 consents or not. This includes the prohibition on adults in a position of trust.

Power and positions of trust

All adults working with pupils in education settings hold positions of trust. Employees must not exploit this power imbalance for personal gain. Even as a non-permanent staff member at partner schools, you are perceived by pupils as an authority and trusted figure, similar to their teachers.

You must always maintain professionalism, avoid behaviour that could be misinterpreted, and report any incidents that might be. We expect you to adhere to this standard of conduct to prevent any misinterpretation of your actions, including outside of school.

Criminal offences involving violence, illegal drugs, or sexual misconduct are unacceptable and could lead to dismissal. Additionally, even low-level concerns are included in schools' safeguarding policies and must be taken seriously.

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