Safeguarding and Child

Protection Policy

03 July 2023

# Policy Statement

Cambridge Online Tuition (“*the Company*”) is committed to providing the highest standard of safeguarding and, as such, safety is a paramount concern.

The Company believes that all children have an absolute right to a childhood free from abuse, neglect, or exploitation. All adults involved in Company activities have a duty of care to safeguard and promote the welfare of the children that they work with.

The Company is committed to promoting the welfare and safety of all individuals in its care and recognises that:-

* There is a responsibility to protect children from harm and that the Company has a duty to take all necessary steps to ensure their safety and well-being, including;
	+ Implementing policies and procedures that comply with relevant legislation and guidelines;
	+ Conducting thorough risk assessments; and
	+ Regularly reviewing and updating our safeguarding measures.
* There is a responsibility to promptly report any suspected or disclosed incidents of abuse and, where necessary, take appropriate action to support those affected; and
* There is a responsibility to promote a culture of openness, transparency, and accountability to support the safeguarding of all individuals in the Company’s care.

# Purpose and Scope of the Policy

The purpose of this policy is to safeguard all users whilst they engage with the Company. This policy applies to anyone using or working on behalf of the Company including tutors, students, parents, and schools.

The scope of this policy extends to the responsibilities of all users. It is therefore important that all users have familiarised themselves with this policy and confirmed that they have read and understood this in writing before engaging in any activity arranged through the Company.

Contravention of this policy could lead to suspension and/or barring from our services.

# Legal Framework

This policy and the procedures contained within it have been developed in accordance with all relevant safeguarding legislation, standards, and UK Law. This includes:-

* The Children Acts 1989 and 2004;
* The Children and Social Work Act 2017;
* The Working Together to Safeguard Children (DfE 2018), What to do if you’re worried a child is being abused (DfE 2015); and
* The Code of practice for out of school settings (DfE 2020 and Keeping children Safe in Education (DfE 2022).

A summary of the key legislation is available from nspcc.org.uk/learning.

This policy statement should also be read alongside our organisational policies, procedures, guidance and other related documents:-

* Privacy Policy and Cookie Policy;
* Standard Terms and Conditions for Tutors or Students;
* Online Safety with Acceptable use Policy and Data Protection Policy;
* Behavioural Policy for Adults or Young Children and the Anti-bullying Policy;;
* Equal opportunities and Diversity Policy; and
* Data Protection Protocol and Procedures Policy.

# Definition of Abuse

A child is any person under the age of 18.

Children are considered to be abused or at risk of abuse by parents/carers when the basic needs of the child are not being met through acts of either commission or omission. This can include, but is not limited to:-

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

All Company staff should also be aware that mental health problems can, in some cases though by no means all, 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 DSO.

All staff at the Company are expected to have an awareness of the above-listed safeguarding issues and to know that behaviours such as drug taking, alcohol abuse, deliberately missing education, and sexting (also known as youth produced sexual imagery) are behaviours that put children in danger.

# Company Responsibilities

The Company will seek to keep children and young people safe by:

* Valuing, listening to and respecting them;
* Appointing a nominated Child Protection Lead for children and young people, as well as a Deputy and a Lead Trustee/board member for safeguarding;
* Adopting child protection and safeguarding best practice through its policies, procedures, and code of conduct for staff and volunteers
* Developing and implementing an effective online safety policy and related procedures;
* Providing effective management for staff and volunteers through supervision, support, training, and quality assurance measures so that all staff and volunteers know about and follow the relevant policies, procedures, and behaviour codes competently;
* Recruiting and selecting staff and volunteers safely, ensuring all necessary checks are made;
* Recording, storing, and using information in line with data protection legislation and guidance (for more information about this is available from the Information Commissioner’s Office: ico.org.uk/fororganisations);
* Making sure that children, young people, and their families know where to go for help if they have a concern;
* Using our safeguarding and child protection procedures to share concerns and relevant information with agencies who need to know, and involving children, young people, parents, families and carers appropriately;
* Using our procedures to manage any allegations against staff and volunteers appropriately;
* Creating and maintaining a behaviour code of conduct and anti-bullying policy environment and ensuring that we have the right policies and procedures to help us deal effectively with any bullying that does arise;
* Ensuring that we have effective complaints and whistleblowing measures in place; and
* Building a safeguarding culture where staff and volunteers, children, young people and their families, treat each other with respect and are comfortable about sharing concerns.

The Company recognises its duty to report concerns or allegations against its directors, staff, or Tutors. All directors, staff, and Tutors must comply with the relevant Code of Conduct when performing their role in order to promote safer working practices.

Allegations of abuse against directors, staff, or Tutors can be made by either a child or an adult and should be made immediately to the DSO. Allegations made against the DSO should instead be made to another member of the leadership team who will inform the other team members. Another suitable senior member of staff will then be appointed to take the place of the DSO in response to the allegation.

This guidance should be followed when any Company representative has:-

* Behaved in a way that has harmed a child, or may have harmed a child; and/or
* Possibly committed a criminal offence against or related to a child; and/or
* Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
* Behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes in and outside responsibilities in the Company (KCSIE 2022, Section 1: Part 355-356).

The Company will deal appropriately and promptly with all allegations or concerns and refer all safeguarding concerns or allegations about its directors, staff or tutors immediately to the appropriate local authority designated officer (LADO) in accordance with local safeguarding procedures and practical guidance, in accordance with the statutory guidance Working Together to Safeguard Children, 2018.

The Company will consider immediate suspension (without prejudice) if a safeguarding allegation is made against any director, staff member or Tutor pending investigation when there is cause to suspect that another child( ren) is /are at risk of harm from their continued contact with children. Refer to KCSIE 2022, Part 4: 379. Suspension will also be considered even if the allegation is not linked to their role or activity with the Company.

# Tutor Registration

Under legal duties to make referrals to the Disclosure and Barring Service, the company will report any concerns about unsafe practice by any of its directors, staff or Tutors to the Disclosure and Barring Service (DBS). This applies where an individual has engaged in conduct that has either harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child. (KCSIE 2022, Part 4: 402). If at any time the Company dismisses a director, member of staff or tutor due to relevant conduct, risk of harm or receiving a caution or conviction for a relevant offence (or the person has resigned or left that post in circumstances where they may have been removed), then a referral to the Disclosure and Barring Service will be made by the DSO.

All Tutors must provide proof of identity and proof of residential address – firstly in an online recorded session and secondly by email as per the government guidelines for checking DBS from Sept 2018.

If the Tutor already has an enhanced DBS certificate within 1 year from the date in which they tutor, they will be asked for their UK passport and proof of address. The Company meets all tutors in the virtual classroom to verify it is them on their ID and to conduct an interview. One to one training is then given in the use of the platform and tutorial links provided.

The Company requires two suitable references. All Tutors undergo an enhanced DBS check every year if they are not on the update service.

All Tutors fill out a self-disclosure form which requires disclosure of criminal offences and barring each year. They also complete an application form (from Feb 2023 onwards).

All Tutors sign a confidentiality statement agreeing not to disclose confidential information to a third party within a terms and conditions document.

All Tutors take a safeguarding level 2 course annually and are aware of the safeguarding protocols specifically for COT.

All Tutors receive a “*Tutor Pack*” upon joining which contains all the necessary documents they require to provide lessons safely and with the utmost professionalism at the Company. They receive log-ins for academic resources, key bullet point information on tutoring tips, and safeguarding children.

# Recording of Online Sessions

All online lessons will be recorded and normally available for play back to the parents and students for 4 weeks from the date of the lesson.

The Company regularly reviews tutorial recordings for the purpose of improving our service, training, and supervision of tutors or where a complaint or safeguarding report has been made.

The Company will allow access to UK law enforcement of any recording where it is reported a criminal offence may have occurred in relation to a specific session.

Where we are directly engaged by parents, tutors will only have access to their tutee’s parents’ email address under certain circumstances agreed by COT.

At no time nor for any reason, will any tutor give their email address, phone number nor any other personal information to any child using the services of Cambridge Online Tuition. Neither will they seek nor accept any personal contact details from any child using the services of the Company.

All email communication will be copied to Dr Laura Brown at the Company whether that be from tutor to parent or parent to tutor.

# Tutor Responsibilities

Tutors are not employees of the Company and are solely responsible for their own actions, both on and off the website and platform. Tutors are also solely responsible for their own security in conjunction with our services, both on and offline.

Nonetheless, Tutors are expected to actively look out for any safeguarding concerns relating to the pupils they tutor, whether it be a direct disclosure or something witnessed that gives cause for concern.

In accordance with safeguarding regulations, Tutors are expected to:-

* Ensure that their learning environment does not display any inappropriate images or documentation capable of being viewed by the student or parent or carer when conducting a session.
* Be dressed appropriately in a manner that would be suitable for their attendance at a school in person;
* Treat students fairly and without prejudice or discrimination, whatever their age, culture, ability, gender, language, racial origin, religious belief and/or sexual identity;
* Always ensure that their language is appropriate and not offensive or discriminatory;
* Ensure that any contact with the student is appropriate to their role as a Tutor and confined to the relevant tutorial session;
* Not make any improper suggestions to a student;
* Not send unsolicited communications to the student or parent/responsible adult;
* Report any dispute, safeguarding concern or illegal activity with a student or parent/responsible adult to the Company and complete an “*Incident Form*”;
* Ensure that if no parent/responsible adult is present during a tutorial session that the student is comfortable to continue the session; if not, they can terminate the session;
* Must record every lesson and be aware they are available for review by a student or parent/responsible adult for a period up to 4 weeks (also see Recording of Sessions);
* Not take screenshots of sessions;
* Not share any links to online content or websites that contain anything other than educational resources;
* Ensure they attend lessons in good time, only at the designated times and dates and will never agree to any additional sessions with the tutee without a registered adult present and permission from the Company;
* Disclose any criminal convictions they may have to the Company by signing the self-disclosure form;
* Take every precaution to ensure they work in a safe environment and are responsible for taking out and maintaining any insurance policies necessary to cover the work they undertake;
* Never disclose their phone, email or other communication details with their pupil nor request their pupils’ through the online platform. If any information is to be swapped, it will be between the Tutor and registered adult with permission from the Company. Any communication about a tutee with the Company will involve using the tutee’s initials. If a parent/carer requests that the Tutor contact the young person directly, the Company needs written consent from the parent, and the Tutor must cc the parent/carer and the Company in all email communications.

Ms Laura Brown is the Designated Safeguarding Lead. If, during a lesson, a child makes a disclosure to a Tutor, they are to notify Ms Brown by completing the following procedure:-

* Stay calm and not express their own views when the child is disclosing information. Listen to what they have to say and do not put any words in their mouth. Be supportive and objective, but don’t promise confidentiality and advise them that you will inform Laura Brown of Cambridge Online Tuition who will investigate further.
* Immediately after, complete the “*incident form*” found within the Tutor pack. Ensure any information relating to the issue raised is written up as soon as possible after the event in order to ensure the greatest possible accuracy. It should be signed and dated by the person reporting or who witnessed the behaviour of concern and the DSL.
* Consider the report and resolve any concerns or take appropriate action to prevent this happening again. A detailed record of the concern will be logged even if no further action is needed at this time; and
* If applicable, refer this immediately to the authorities (Children’ social care). Keep a full record of the incident either way. Once the decision is made to make a referral the Safeguarding Team will contact the relevant Children’s Social Care Team and make a telephone referral. This must be followed up in writing within 24 hours.

The Company reserves the right to make a final decision on action taken for minor breaches of our Safeguarding and Child Protection Policy.

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children’s social care (and if appropriate the police) is made immediately.

# Student Responsibilities

Tutees under the age of 18 must be registered and represented by a parent or legal guardian who gives consent for them to receive tuition. The Company is not responsible for any dispute regarding parental consent.

Tutees are expected to:-

* Treat the Tutor with respect and fairness, and not subject them to abusive behaviour or language;
* Not make any improper suggestions to the Tutor;
* Have no inappropriate communication with the Tutor outside the tutorial session (also see Parents/Responsible adult section below);
* Report any dispute, inappropriate behaviour or illegal activity with a tutor to a parent/responsible adult.
* Be aware that the sessions are recorded and they are available for review for a period up to 4 weeks (also see Recording of Sessions);
* Only receive online tutoring at the designated tutoring times and dates as agreed by their registered adult, the Company and their Tutor;
* Receive tutoring in their own home with a parent or guardian present in the same room or nearby. The door to the room will remain open so the registered adult can hear the lesson and intervene if necessary;
* Be dressed appropriately and ensure the location does not expose any personal information;
* If broadband speeds permit, tutees will keep their video stream on for the duration of their sessions only if they agree. Microphones should be kept on at all times;
* Ensure mobile phones are silent and out of reach;
* Never disclose their phone, email or other communication details with their Tutor nor request those of their Tutor through the online platform;
* Not share any links to online content or websites that contain anything other than educational resources;
* Not take screenshots of sessions; and
* Consent to the recording and monitoring of all online sessions by the Company for the purposes stated in the Recording of online session section above.

# Parent Responsibilities

Parents are expected to:-

* Ensure that the student is fully aware of the Company’s Safeguarding and Child Protection Policy;
* Always be responsible for the welfare of the student during the session and be available during the online session. This will ensure any concerns encountered by the tutee can be reported as soon as possible and ensure the tutee and tutor are behaving in an appropriate manner;
* Always be responsible for the physical environment of the pupil during the session ensuring it is safe and appropriate. Ensure the door to the room where the lesson is taking place remains open at all times and intervene if necessary;
* Ensure that Tutors will be treated with respect and fairness by the student and will not be subjected to abusive behaviour or language;
* Ensure that no improper suggestions are made by either the Tutor or student inside or outside of the lessons and report any unsolicited communications between the Tutor and tutee to the Company. If a parent/carer requests that the Tutor contact the young person directly, the Company needs written consent from the parent, and the Tutor must cc the parent/carer and the Company in all email communications;
* Report any dispute, inappropriate behaviour or illegal activity by a tutor to the Company immediately after the lesson;
* Be aware all tutorials will be recorded and made available for playback for 4 weeks (also see Recording of Sessions);
* Ensure all of their contact details are accurate and up to date when signing the tutee they represent to the virtual classroom; and
* Exercise their own judgement regarding the accuracy of the information provided on the website. The Company does its utmost to keep the website as up-to-date as possible.

# Director Responsibilities

The Director of the Company is expected to:-

* Ensure they are up-to-date with their Designated Safeguarding Lead training;
* Follow the procedure for Tutor registration in the Registration of Tutors section above;
* Ensure that any dispute between persons using the Company’s services is handled efficiently and fairly without discrimination;
* Deal with reports of possible illegal activity promptly, ensuring the safety and wellbeing of the student and/or Tutor;
* If any incident is reported to the police and/or social care relating to a specific session, make the recording available to use as evidence in any proceedings if appropriate (also see Recording of Sessions);
* If appropriate, employ the services of an Independent Child Protection consultant or another DSL to review a report concerning the welfare of a student ensuring an appropriate course of action is taken; and
* Regularly review the policy and procedures to ensure they are relevant and adequate to safeguard all persons using the Company’s services.

# Emergency Responses

Where a child is identified at immediate risk of harm, please immediately contact the Designated Safeguarding Lead who will in turn contact the Police for the areas where the risk is located using 999.

This is especially important when the child is being tutored at home and there is no independent school teacher present. Within one working day of a referral being made, a local authority social worker should acknowledge receipt to the referrer and make a decision about the next steps and the type of response that is required.

Where Tutors are delivering tuition to children and young people in a school or college, the Company DSO/ Deputy must inform the school’s Designated Safeguarding Lead/ Officer of any safeguarding concern.

**Contact details**

**Designated Safeguarding Lead (DSL)**

Name: Dr Laura Brown

Email: contact@cambridgeonlinetuition.co.uk

**NSPCC Helpline**

0808 800 5000

**Updating our policies and procedures**

We are committed to reviewing our policy and good practice annually to ensure it is adequate and relevant to safeguarding standards.