

## **ABC Education Limited Safeguarding Policy and Procedures**

Date: 18th March 2024

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“Safeguarding is everyone’s business at ABC Education Limited – We are committed to safeguarding and promoting the welfare of children and young people and we expect all Directors, staff and tutors and tutors to share this commitment.”

### **OBJECTIVE**

The purpose of this document is to outline ABC Education Limited’s Safeguarding Policy and Procedures and set out the ways of working we use as a company to show our commitment to ensuring our safeguarding practices reflect our statutory responsibilities, government guidance and best practice.

This policy establishes a framework to support all those who come into contact with ABC Education Limited, protect them from harm, abuse and maltreatment of any kind and clarifies the organisation’s expectations.

We will apply robust risk management processes for the identification of situations which may require the organisation to make professional judgements to protect students from harm. A full risk assessment will be conducted on each student at the commencement of tuition to ensure all components have been considered.

The organisation will collectively manage risks and reduce the likelihood of harm and abuse by:

- The provision of up-to-date safeguarding policies and procedures that reflect current safeguarding legislation and guidance
- Have robust safer recruitment, selection and appointment procedures for staff and tutors and tutors
- Promote and use safer working practices for Directors, staff and tutors, tutors and students
- The provision of induction and continuous training for staff and tutors and tutors
- Developing and maintaining a culture of vigilance within all areas of the organisation’s work
- Protecting students from harm
- Making sure people can raise safeguarding concerns regardless of whom it relates to
- Handling allegations or incidents in accordance with policies and procedures
- Report any allegations or incidents to the relevant authorities

It is the responsibility of all directors, staff and tutors, service users (students/parents) and tutors to read this policy and supporting procedures and be fully informed of what to do in the event of a safeguarding concern.

### **WHO IS THIS POLICY FOR?**

- Directors
- Tutors
- Staff and tutors
- Service users (parents/guardians)
- Educational establishments

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#### 4. DEFINITIONS OF ABUSE

Children are considered to be abused or at risk of abuse by others when the basic needs of the child are not being met through acts of either commission or omission. Children includes everyone under the age of 18 (KCSIE, 2023). Someone who is subjected to abuse may be experiencing more than one type of abuse and the abuse may be being conducted by family, friends, professional, someone they trust or know.

Knowing the signs of abuse is vital to the early identification of abuse and neglect. All staff and tutors will be aware of indicators of abuse and neglect through their experience and training so that they are able to identify cases of children who may be in need of help or protection. If staff and tutors are unsure, they should always speak to the designated safeguarding lead (or deputy), sometimes there may not be a specific verbal or visual clue but a change in behaviour or conduct/language should still be reported as it may form part of a bigger picture.

All staff and tutors are aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their own experiences as harmful (KCSIE 2023).

All staff and tutors should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children and young people are at risk.

Safeguarding and promoting the welfare of children and young people is defined as:

- Protecting children from maltreatment
- Preventing impairment of children’s mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- Taking action to enable all children to have the best outcomes

#### 4.1 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. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children (KCSIE, 2023, para 26).

#### 4.2 Types of abuse and neglect

##### 4.2.1 Physical abuse

Is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

##### 4.2.2 Emotional abuse

Is 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 in so far as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children.

These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

##### 4.2.3 Sexual abuse

This involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing.

They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse.

Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of

sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

#### 4.2.4 Neglect

Is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs

#### 4.2.5 Peer on Peer / Child on Child Abuse

Children can abuse other children (often referred to as peer-on-peer abuse) and it can take many forms. It can happen both inside and outside of school/college and online. It is important that all staff and tutors recognise the indicators and signs of peer-on-peer abuse and know how to identify it and respond to reports. This can include (but is not limited to): bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse within intimate partner relationships (sometimes known as "teenage relationship abuse"); physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence and sexual harassment; consensual and non-consensual sharing of nude and semi-nude images and/or videos; causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party; upskirting and initiation/hazing type violence and rituals; sexual comments, remarks, jokes and online sexual harassment.

Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. It is crucial that all staff and tutors understand when working with children they should maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the best interests of the child. Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe (KCSIE 2023, pg 139)

#### 4.2.6 Sexual Violence and Sexual Harassment between children

Sexual violence and sexual harassment can occur between two or more children of any age and sex, from primary through to secondary stage and into college. It can occur also through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face-to-face (both physically and verbally) and are never acceptable (KCSIE 2023, Part 5: 448)

ABC Education Limited are clear that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated. It should never be passed off as; banter, having a laugh, part of growing up or boys being boys.

Child on child sexual violence can happen both inside and outside of education settings. For the purposes of this policy and procedures when referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 specifically, rape, assault by penetration, sexual assault and causing someone to engage in sexual activity without consent (KCSIE 2023 Part 5: 452)

Sexual harassment is 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside education settings. Child on child sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated degraded or humiliated and/or create a hostile, offensive or sexualised environment. (Sexual violence and sexual harassment between children in schools and colleges, (KCSIE 2023, Part 5: 453-6)

#### 4.2.7 Harmful Sexual Behaviour

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour" (HSB). HSB can occur online or face to face, or simultaneously. HSB should be considered in a Child Protection context. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying HSB have often experienced their own abuse and trauma. It is important that they are offered appropriate support (KCSIE 2023, Part 5: 459)

#### 4.2.8 Child Protection

Is one part of safeguarding and promoting the welfare of children and refers to the activity that is undertaken to protect children who are suffering, or at risk of suffering significant harm.

#### 4.2.9 Significant Harm

The definition of significant harm is not prescriptive. The interpretation will depend largely on professional judgement, based on the known facts. It can include inappropriate touching, an assault, or a series of compounding events e.g., bullying. Other factors to be considered include the age and vulnerability of the child, the degree of force used, the frequency of the harm, the nature of the harm in terms of ill treatment, and the impact on the child's health and development.

Annexes A & B of KCSIE 2023 contains important additional information about specific forms of abuse and safeguarding issues. ABC Education Limited requires all staff and tutors to read the annexes in conjunction with this policy and supporting procedures.

## 5. SAFER RECRUITMENT

### Introduction

- 1.1 ABC Education Limited (company number 11946305) Lower Bungalow, Kildare Road, Bordon, Hampshire, GU35 0HL (“ABC Education”) requires tutors representing it to provide tuition to students in an amiable and safe environment.
- 1.2 ABC Education has a moral and legal obligation to ensure that, when given responsibility for young people and vulnerable adults, they are treated with the highest possible standard of care.
- 1.3 ABC Education’s Safer Recruitment Policy (the “Policy”) aims to ensure that unsuitable candidates are deterred from applying to work with ABC Education’s students and should they apply, they will not be successful in their application.
- 1.4 Our recruitment and selection procedures have the objective that the most suitable candidates are hired as tutors, with all applicants receiving fair and unbiased treatment during the entire recruitment process.
- 1.5 ABC Education is committed to providing the best possible care to its students and vulnerable adults and to safeguarding and promoting the welfare of children and young people.
- 1.6 Our Policy adheres to relevant employment law practice and other legislation and incorporates statutory guidance for schools and colleges contained in Keeping children safe in education 2023, Part three: Safer recruitment (2023) where relevant to ABC Education.
- 1.7 Potential candidates should note that it is an offence in accordance with Section 7(1)(a) of the Safeguarding Vulnerable Groups Act 2006 to apply for a role as a private tutor working with children if the applicant is barred from engaging in regulated activity relevant to children.
- 1.8 Safer recruitment is acknowledged as our first line of defence in the safeguarding of children and young people.
- 1.9 The Policy is intended to set out the values, principles and policies underpinning ABC Education’s approach to recruitment and selection of its tutors.
- 1.10 All staff involved in the recruitment process must fully adhere to this Policy.

## **2 Job Advertisements**

- 2.1 ABC Education posts tutoring vacancies which run on job internet platforms such as Indeed and TES. These posts run for 2 weeks approximately a month in duration, ensuring that ABC Education benefits from as wide a pool of prospective candidates as possible.
- 2.2 These adverts outline the expectations and requirements for the tutoring role, including the requirement to have a minimum of 12 months of relevant UK tutoring / teaching experience and a QTS if needed for the role.
- 2.3 Adverts require candidates to submit a CV and encourage candidates to submit a cover letter.
- 2.4 The adverts make clear that ABC Education follows stringent screening, and pre-employment checks including:

2.4.1 Holding a screening call and in-person/video interview;

2.4.2 Ensuring that a candidate has a clean and current Enhanced DBS, with a check of the children's barred list; and

2.4.3 Require candidates to provide at least 2 independent professional work references relevant to the role advertised. One of these referees will be called and the reference is confirmed for reliability.

2.4.4 Require candidates to fill out a registration form and pre disclosure form.

2.4 The adverts include pre-screening questions, including a question on whether the candidate has a clean and current enhanced DBS in place and the necessary required experience.

### **3 Initial Screening**

3.1 ABC Education reviews pre-screening questions, CVs, and cover letters to determine if a candidate meets the job requirements.

3.2 ABC Education has a broadly gender balanced workforce of tutors and Safer Recruitment Policy – Tutors gender is not considered when hiring tutors.

3.3 Potentially suitable applicants are shortlisted, provided with a registration form to complete, and then screened after this form is received.

3.4 The purpose of the screening call is to determine if the candidate appears suitable to work with our students and thus be offered an interview.

3.5 Key questions covered in the screening call include:

3.5.1 Whether they have the right to work in the UK

3.5.2 Their current role;

3.5.2 Their motivation for applying for the role;

3.5.3 Their tutoring / teaching experience and whether they are registered with any professional bodies

3.5.4 If they possess an Enhanced DBS;

3.5.5 What subjects they are looking to tutor;

3.5.6 Their available time to tutor during the week;

3.5.7 Their SEN or other relevant experience;

3.5.8 Other relevant questions based on their CV or cover letter, such as understanding gaps; if they have lived or been schooled overseas; and

3.5.9 Determination of their communication skills, enthusiasm, and professionalism.



## **4 Equal Opportunities**

4.1 ABC Education follows an equal opportunities policy and wishes to recruit and employ those people who are best suited for the vacancies for which they have applied, regardless of sex, sexual orientation, religion and belief, race, disability, maternity and pregnancy, age, gender, gender reassignment, marriage and civil partnership.

4.2 ABC Education complies fully with the Equality Act 2010.

## **5 Initial Interview**

5.1 Successfully screened candidates are invited for an interview with the directors and are asked to provide the list of documents/references outlined in Clause 6.2 below prior to the interview. These documents are checked for authenticity, copied, and kept on file with signatories from the directors.

5.2 The interview process is designed to ensure that a candidate would be suitable for the role based on their qualifications and experience, that they understand their obligations in terms of safeguarding and child protection and take them seriously, and to identify any red flags.

5.3 The interview also enables ABC Education to get to know its tutors more personally to make better matches to students.

5.4 During the interview, ABC Education provides the candidate with:

5.4.1 An introduction to ABC Education and its mission statements, including guidance on the ABC Education approach;

5.4.2 An outline of the key requirements of our Child Protection and Safeguarding Policy;

5.4.3 The expectations of ABC Education regarding communication and conduct and a broad outline of the tutoring process;

5.4.4 A description of the training tutors will be required to do as ABC Education tutors including our induction process and yearly training.

5.4.5 The pay for their role; and

5.4.6 An explanation of the next steps in the process.

5.5 The candidate is asked a variety of questions to cover the objectives in Clauses 5.2 and 5.3, including:

5.5.1 A review of their experience as outlined in their CV and a request for further references if references supplied do not cover key relevant recent roles;

5.5.2 Scenarios for handling a particular type of student, to determine if they demonstrate the experience claimed in their CV;

- 5.5.3 A discussion of any gaps in their CV;
  - 5.5.4 A review of their relevant qualifications;
  - 5.5.5 An assessment of their motivation for wanting to work with children in the particular role;
  - 5.5.6 If there are any disciplinary actions outstanding, or cautions, warnings or barrings;
  - 5.5.7 If they are able to perform the duties of a self-employed tutor; and
  - 5.5.8 If they have the right to work in the UK if they do not possess a UK passport.
- 5.6 In the interview, the candidate's responses are closely examined when questioned about how they tutor and work with students, especially those with special educational needs.
- 5.7 Initial interviews are conducted by both ABC Education's directors online using video communications software, but subject to a final in-person meeting and document check.
- 5.1 Successfully screened candidates are invited for an interview with the directors and are asked to provide the list of documents/references outlined in Clause 6.2 below prior to the interview. These documents are checked for authenticity are copied and place on file with signatories from the directors should the candidate be deemed suitable for the role. All interview notes are signed by both directors and kept on the candidate's file along with their documents.

## **6 Checks and References**

6.1 ABC Education carries out several pre-hiring checks in respect of tutors short-listed for background checks following the interview stage.

6.2 The following checks are performed:

- 6.2.1 A minimum of 2 professional written references, with the references to cover recent relevant jobs in the candidate's CV;
- 6.2.2 At least one of these references is called to confirm the authenticity of their reference;
- 6.2.3 Original documentary evidence of relevant qualifications and professional certifications, for example, a QTS certificate;
- 6.2.4 A current original DBS at enhanced level, with a check of the children's barred list. This must be maintained on the update service, which ABC Education will only check once it receives the express permission of the tutor following contracting); and
- 6.2.5 A candidate's passport and if appropriate, that a valid work permit is in place. Where tutors have immigrated or returned to the UK in the last 5

years, they will also need to provide references from their country of origin and a police check / DBS equivalent from their country of origin.

6.3 To streamline its process following Covid-19, ABC Education performs initial checks of the documents outlined in Clause 6.2 via scans sent via email, with a final in-person check of documents scheduled before a tutor is eligible to commence tutoring.

6.4 Reference checks include enquiring about any safeguarding concerns.

6.5 In addition, the short-listed tutor is required to complete a tutor profile on our tuition management system, which includes:

6.5.1 Address, phone number and a recent professional photograph;

6.5.2 Teaching Experience and Bio;

6.5.3 Teaching skills;

6.5.4 Qualifications, professional certifications, and academic institutions; and

6.5.5 CV (up to date to incorporate latest tutoring/teaching experience).

6.6 Where a candidate does not have an enhanced DBS check in place, ABC Education is able to process this check on their behalf, using a third-party provider (DBS Direct), (the tutor is responsible for this cost). This is performed following contracting and an in-person meeting but is a requirement before any tuition can commence.

## **7 Contracting**

7.1 If the referencing process is satisfactorily completed and all checks outlined in Clause 6.2 (except where Clause 6.6 applies) have been completed, the directors propose the candidate joins our team of tutors.

7.2 Both directors are responsible for performing a final review of a candidate's documents and their tutor profile before sending them the following:

7.2.1 A Key Information Document in accordance with regulation 13A of the Conduct of Employment Agencies and Employment Businesses Regulations 2003;

7.2.2 A Tutor Pack providing a tutor with information on their role, next steps for training, including signing documents and a final in-person meeting and document check;

7.2.3 A contract for services;

7.2.4 The Safeguarding and Child Protection Policy;

7.2.5 An agreement between the tutor and clients of the agency;

7.2.6 The tutor pack, containing detailed guidance on providing tuition safely (including taking necessary precautions due to Covid-19 and adhering to the Safeguarding and Child Protection Policy), how to access online training, ABC Education's tuition management system, Tutor Toolkit, and providing online tuition safely.

7.3 Candidates are required to sign the contract for services and the Safeguarding and Child Protection Policy.

7.4 The contract for services requires the tutor to:

7.4.1 adhere to ABC Education's various policies and procedures, including ABC Education's Safeguarding and Child Protection Policy and those outlined in the tutor pack;

7.4.2 provide ABC Education with a clean enhanced DBS that is on the update service.

7.4.3 give ABC Education permission to check the DBS update service every 6 months;

7.4.4 provide ABC Education's with information about any criminal history or anything that would make the tutor unsuitable to work with children, as well as previous or pending complaints, disciplinary procedures or investigations made against the tutor, by any party and of whatsoever nature, regardless of whether the tutor believes there is any merit in such action;

7.4.5 give ABC Education permission to carry out any checks that it deems necessary in connection with Clause 7.4.4 above, including, for qualified teachers, the Prohibited Teacher List database, and the tutor agrees to provide the Agency with any information requested to carry out such checks;

7.4.6 agree to undertake required induction tutor training and safeguarding training as well as safeguarding refresher training;

7.4.7 acknowledge that it is an offence in accordance with Section 7(1)(a) of the Safeguarding Vulnerable Groups Act 2006 to provide tuition if barred from engaging in regulated activity relevant to children; and

7.4.8 attest to being physically and mentally fit to provide tuition.

## **8 In-person final meeting, final checks, and induction training**

8.1 Candidates who sign a contract for services and their Safeguarding and Child Protection Policy will be invited to an in-person meeting with one of the directors prior to commencing any tutoring.

8.2 This in person meeting will take the form of an informal chat over coffee as well as a document check of original documents outlined in Clauses 6.2.3, 6.2.4 and 6.2.5.

8.3 For qualified teachers, ABC Education checks the Prohibited Teacher List database and documents in its tutor database that this check has been satisfactorily completed (or terminates a tutor's contract if this check brings to light information that was withheld from ABC Education in contravention of the contract for services). Note that although ABC Education is ineligible to use the Teacher Services web portal to directly perform prohibition list checks on teachers, in order to safeguard its students, it has entered into an agreement with the Teaching Regulation Agency to carry out such checks on its behalf.

8.4 ABC Education flags on its tutor database those tutors that have not completed an in-person check, or have an outstanding or expired DBS. Such tutors are not eligible to provide tutoring to any students.

8.5 Tutors must undertake induction tutor training (created by ABC Education for our tutors) and safeguarding induction training and submit and pass a series of assessments for each training course within one month of signing their contract as a condition of their contract for services.

8.6 Tutors that have not satisfactorily completed induction tutor training or safeguarding induction training or safeguarding refresher training are also flagged on the system as ineligible to provide tutoring to any students.

## **9 On-going procedures**

9.1 ABC Education carefully monitors tuition and lesson reports weekly and follows up with all clients/councils following a tutor trial and on a periodic basis.

9.2 ABC Education Limited do not place newly recruited tutors into packages on a full time basis until they are satisfied with conduct, lesson report details, termly report details and work output. The length of time will depend on the amount of hours the tutor has done to support and this is at the discretion of the Directors of ABC Education Limited.

9.3 Any client/council concerns raised are escalated and discussed with the other directors and any appropriate action is taken, including terminating a tutor's contract for services and ceasing to work with a tutor, or taking any further steps necessary.

9.4 ABC Education arranges periodic training workshops, discussions and CPD for tutors.

9.5 ABC Education provides tutors with ongoing feedback about their performance. ABC Education also conducts termly observations of teaching and provides written feedback as well as discusses with the tutor teaching progress.

9.6 ABC Education maintains active dialogue with all tutors, and sends tutor broadcasts via its tuition management system to all tutors with important updates when required, for example to update tutors on safeguarding or Covid-19 procedures.

## 10 Conclusion

10.1 ABC Education is committed to ensuring that when given responsibility for young people and vulnerable adults, they are treated with the highest possible standard of care.

10.2 ABC Education will take all necessary steps to guard against working with tutors who are not suitable to work with children or vulnerable adults and will cease to work with tutors that do not meet our stringent tutoring standards.

## 6. ONLINE SAFETY

ABC Education Limited takes a holistic approach to online safety that aims to protect staff and tutors, tutors and students in their use of technology. All communication between tutors and students take place via email and the office is copied in to any communication. Parents/guardians must also copied in to all communications as stated in our tutor handbook. Personal details of clients are kept to a minimum (name, email address as well as address if in person tuition is taking place) for the tutor to be able to conduct their role in the education of the student.

We have established mechanisms to identify, intervene in and escalate any concerns where appropriate.

As outlined in KCSIE 2023 (Part 1: 136) ABC Education Limited recognise the considerable breadth of issues classified within online safety, which have been categorised into the following four areas:

- content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism
- contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes'
- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g., consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and

- commerce - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff and tutors are at risk, please report it to the Anti-Phishing Working Group. <https://apwg.org/>

ABC Education Limited ensures online safety is a constant running and interrelated theme through the development and implementation of all our services, policies and procedures.

## 7. SOCIAL MEDIA ACCEPTABLE USE

Social media is a broad term for any kind of online platform which enables people to directly interact with each other. It allows people to share information, ideas and views. Examples of social media include blogs, Facebook, LinkedIn, Twitter, Google+, Instagram, TikTok, Snapchat and YouTube.

### 7.1 Acceptable Use

ABC Education Limited staff and tutors should be aware that content uploaded to social media is not private. Even if you restrict it to 'friends', there is still capacity for it to be re-posted or distributed beyond the intended recipients. Therefore, staff and tutors using social media should conduct themselves with professionalism and respect.

Staff and tutors and tutors should not upload any content on to social media sites that:

- is confidential to the company or its staff and tutors
- amounts to bullying
- amounts to unlawful discrimination, harassment or victimisation
- brings the company into disrepute
- contains lewd, sexually explicit, threatening or similarly inappropriate or offensive comments, images or video clips
- undermines the reputation of the school and/or individuals
- is defamatory or knowingly false
- breaches copyright
- is in any other way unlawful.

Staff and tutors and tutors on the platform should be aware of both professional and social boundaries and should not accept or invite 'friend' requests from students or ex-students, or from parents on their personal social media accounts such as Facebook.

Any content or online activity which raises a safeguarding concern must be reported to the ABC Education Limited safeguarding team via the incident report form.

Following any report of inappropriate use of social media, the Company will conduct an investigation, this may lead to removal from the contract and/or disciplinary action taken. This includes a referral to any external agencies if deemed necessary.

## 8. SAFEGUARDING STUDENTS OF DIFFERENT AGES

ABC Education Limited recognises that it provides tuition across a wide range of age groups, from Primary education through to A-level students.

ABC Education Limited is committed to ensuring their staff and tutors and are adequately trained and prepared to recognise the different types of abuse that can impact the different age groups.

All staff and tutors undergo compulsory training on an annual basis. Tutors are made aware of how they can report a Safeguarding concern, and particularly what to recognise in a Primary environment, where signs may be less obvious.

In addition, ABC Education Limited recognises their safeguarding responsibilities towards their tutors. ABC Education Limited provides support and advice to all tutors, by providing open and easy methods of communication and supporting tutors through lesson observations and feedback.

## 9. SAFEGUARDING INTERNATIONAL STUDENTS

ABC Education Limited recognises that international students use and access online tuition. ABC Education Limited uses the same reporting approach to international students as it does to the UK.

The ABC Education Limited safeguarding team will always endeavour to follow the same policy and procedures and notify the relevant local authority equivalent where possible.

## 10. WHAT TO DO IF YOU HAVE A SAFEGUARDING CONCERN

### 10.1 Reporting

It's vital that you report any safeguarding concerns to ABC Education Limited so our Safeguarding Team can investigate fully. All Safeguarding concerns will be investigated within 24 hours of ABC Education Limited receiving the report.

To help the Safeguarding team respond and refer appropriately you should follow the guidance below.

- Remember that concern forms are used in court cases and inquests as evidence.
- Reports should be objective and detailed.
- If you cannot access a copy of the Safeguarding Concern Form then contact a member of the ABC Education Limited Team who will assist you with making a report.
- Please alert the team as soon as possible, the earlier we start the better

To report a safeguarding concern to ABC Education Limited:

- ABC Education Limited Safeguarding Concern Form
- Get in touch via email or phone.
- [safeguarding@abctutoring.co.uk](mailto:safeguarding@abctutoring.co.uk)
- +44 (0) 1420 610 147 - Monday-Sunday, 8am-7pm



- +44 (0) 3330 902 646 - Out of hours Safeguarding

To report a safeguarding concern to Cambridgeshire and Peterborough Council:

- <https://www.safeguardingcambspeterborough.org.uk/concerned/>

## 10.2 Disclosure

Once a disclosure has been made or a concern has been shared, the Safeguarding Team will consider the information, if necessary, taking advice from the relevant safeguarding teams, and will make a decision to either:

- Keep detailed records of the concern with no further action at this time
- Make a child protection referral to Children's Social Care

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.

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 via e-mail within 24 hours.

## 10.3 Emergency responses

Where a child is identified at immediate risk of harm then the tutor will immediately contact the Designated Safeguarding Lead who will in turn contact the Police for the areas where the risk is located using 999 or the NSPCC on 0808 800 5000. 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 ABC Education Limited DSO/ Deputy must inform the school's Designated Safeguarding Lead/ Officer of any safeguarding concern.

## 10.4 Allegations against Directors

ABC Education Limited 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 and tutors will then be appointed to take the place of the DSO in response to the allegation.

This guidance should be followed when any ABC Education Limited 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 ABC Education Limited (KCSIE 2023, Section 1: Part 356-357)

ABC Education Limited 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: a guide to inter-agency working to safeguard and promote the welfare of children.” (Department for Education, 2018).

ABC Education Limited 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 2023, Part 4: 380.

Suspension will also be considered even if the allegation is not linked to their role or activity with ABC Education Limited.

#### 10.5 DBS Requirement and Duty to Report

Under legal duties to make referrals to the Disclosure and Barring Service, ABC Education Limited 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 2023, Part 4: 404)

If at any time ABC Education Limited 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.

#### 10.6 Learning Lessons

ABC Education Limited are committed to learning any lessons, alongside support and guidance with the LADO to determine whether there are any improvements to be made to our procedures, or to help prevent similar events in the future. This includes lessons learned about suspension, reinstatement after suspension. (KCSIE 2023, Part 4: 421-422)

#### 10.7 Low Level Concerns

We aim to create a culture where all concerns about all adults working on behalf of ABC Education Limited are dealt with promptly and appropriately.

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of ABC Education Limited may have acted in a way that:

- is inconsistent with the staff and tutors code of conduct, including inappropriate conduct outside of work and
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

## 11. ANTI-BRIBERY AND CORRUPTION

Bribery is, in the conduct of the Company's business, the offering or accepting of any gift, loan, payment, reward or advantage for personal gain as an encouragement to do something which is dishonest, illegal or a breach of trust. Bribery is a criminal offence.

The Company prohibits any form of bribery. We require compliance, from everyone connected with our business, with the highest ethical standards and anti-bribery laws applicable. Integrity and transparency are of utmost importance to us and we have a zero tolerance attitude towards corrupt activities of any kind, whether committed by ABC Education Limited employees or by third parties acting for or on behalf of ABC Education Limited.

### 11.1 Offence

It is a criminal offence to:

- offer a bribe
- accept a bribe
- bribe a foreign official
- as a commercial organisation,
- to fail to prevent a bribe

You should be aware that if you are found guilty by a court of committing bribery, you could face up to 10 years in prison and/or an unlimited fine. The Company could also face prosecution and be liable to pay a fine.

### 11.2 Definitions of Bribery and Corruption

Corruption is the misuse of office or power for private gain. Bribery is a form of corruption which means in the course of business giving or receiving money, gifts, meals, entertainment or anything else of value as an inducement to a person to do something which is dishonest or illegal.

### 11.3 Scope

This policy applies to all employees of ABC Education Limited regardless of seniority or site. It also extends to anyone working for or on our behalf e.g. those engaged by us on a self-employed basis or an agency arrangement. We will encourage the application of this policy where our business involves the use of third parties e.g. suppliers; contractors.

#### 11.4 Gifts and Hospitality

We realise that the giving and receiving of gifts and hospitality where nothing is expected in return helps form positive relationships with third parties where it is proportionate and properly recorded. This does not constitute bribery and consequently such actions are not considered a breach of this policy.

Gifts include money; goods (flowers, vouchers, food, drink, event tickets when not used in a hosted business context); services or loans given or received as a mark of friendship or appreciation.

Hospitality includes entertaining; meals or event tickets (when used in a hosted business context) given or received to initiate or develop relations. Hospitality will become a gift if the host is not present.

No gift should be given nor hospitality offered by an employee or anyone working on our behalf to any party in connection with our business without receiving prior written approval from Claire McAvoy and Alicia Buckle (Directors). Similarly, no gift nor offer of hospitality should be accepted by an employee or anyone working on our behalf without receiving prior written approval from Claire McAvoy and Alicia Buckle (Directors).

A record will be made of every instance in which gifts or hospitality are given or received.

#### 11.5 Policy

It is prohibited, directly or indirectly, to offer, give, request or accept any bribe i.e. gift, loan, payment, reward or advantage, either in cash or any other form of inducement, to or from any person or company in order to gain commercial, contractual or regulatory advantage for the Company, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.

It is also prohibited to act in the above manner in order to influence an individual in his capacity as a foreign public official. You should not make a payment to a third party on behalf of a foreign public official.

If you are offered a bribe, or a bribe is solicited from you, you should not agree to it unless your immediate safety is in jeopardy. You should immediately contact Claire McAvoy and Alicia Buckle (Directors) so that action can be taken if considered necessary. You may be asked to give a written account of events.

If you, as an employee or person working on our behalf, suspect that an act of bribery, or attempted bribery, has taken place, even if you are not personally involved, you are expected to report this to contact Claire McAvoy and Alicia Buckle (Directors). You may be asked to give a written account of events.

Appropriate checks will be made before engaging with suppliers or other third parties of any kind to reduce the risk of our business partners breaching our anti-bribery rules. The Company will ensure that all of its transactions, including any sponsorship or donations given to charity, are made transparently and legitimately.

ABC Education Limited takes any actual or suspected breach of this policy extremely seriously and will carry out a thorough investigation should any instances arise. We will uphold laws relating to bribery and will take disciplinary action against any employee, or other relevant action against

persons working on our behalf or in connection with us, should we find that an act of bribery, or attempted bribery, has taken place. This action may result in your dismissal if you are an employee, or the cessation of our arrangement with you if you are self employed, an agency worker, contractor etc.

## 12. WHISTLEBLOWING

Staff and tutors and tutors should feel able to raise concerns about poor or unsafe practice and potential failures in ABC Education Limited's safeguarding regime.

Appropriate whistleblowing procedures, which are suitably reflected in staff and tutors and tutors' induction, training and the code of conduct, are in place for such concerns to be raised with ABC Education Limited's leadership team.

Where a staff and tutors member or tutor feels unable to raise the issue with their manager or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them:

- general guidance on whistleblowing can be found via: Advice on Whistleblowing; and
- The NSPCC's What you can do to report abuse dedicated helpline is available as an alternative route for staff and tutors who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school or college. Staff and tutors and tutors can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

ABC Education Limited whistleblowing policy can be found separately.

## 13. SAFEGUARDING GOVERNANCE

ABC Education Limited is committed to providing support to all those involved with the organisation. A clear structure of safeguarding accountability supports everyone to understand their individual and collective responsibilities for safeguarding children and young people.

ABC Education Limited will ensure it has arrangements in place to fulfil its commitment and duty to safeguard children and young people in accordance with legislation and statutory guidance.

### 13.1 ABC Education Limited Board of Directors

Directors play a vital role in ensuring that they are legally compliant in order to manage the organisation's resources effectively and provide a long-term vision and protect the organisation's reputation and values.

In order to fulfil these responsibilities, the Board of Directors may delegate some or all of these responsibilities' individual directors or members of the leadership team.

Directors are responsible for:

- Approving all safeguarding policies and supporting procedures
- Ensuring adequate resources are available for effective safeguarding practices and training

- Ensuring effective reporting and auditing processes are in place and that the same are regularly reviewed
- Receiving regular safeguarding reports from the leadership team
- Developing a culture within the organisation that promotes effective safeguarding practices

### 13.2 ABC Education Limited Leadership Team

The leadership team will ensure a commitment to safeguarding is integral in the delivery of all its services, activities and contracts. They will assist in the safer recruitment and selection of staff and tutors.

The Leadership Team will ensure that:

- Safeguarding and a culture of vigilance is promoted and embedded in all areas of the organisation including with the organisation's partners and contractors
- Clear and effective communication pathways for safeguarding are shared with all staff, tutors and customers
- Proposed changes to safeguarding policies and supporting procedures are presented to the Board in accordance with the agreed cycle of policy review
- The Named Designated Safeguarding Officer and Deputy Designated Safeguarding Officers have sufficient resources in order that they may discharge their functions detailed below
- Safe recruitment and selection practices of staff and tutors and tutors are implemented in accordance with the safer recruitment policy and procedures
- They coordinate the investigation of concerns and allegations against staff and tutors members or tutors

### 13.3 ABC Education Limited Named Designated Safeguarding Officer and Deputies

The Named Designated Safeguarding Officer (DSO) and Deputy Designated Safeguarding Officers (DDSO) will be provided with the appropriate level of training to enable them to fulfil their responsibilities in supporting and guiding staff and tutors and tutors on safeguarding matters. The training should be updated every two years. They are responsible for responding to initial concerns or disclosures.

The Named Designated Safeguarding Officer and Deputies will:

- Provide ready and accessible support and guidance to all staff and tutors, tutors and directors on safeguarding matters
- Manage all safeguarding reports and act as liaison for statutory services during any criminal or safeguarding investigation
- Ensure that serious incidents relating to safeguarding are reported immediately and managed effectively
- Report allegations against directors, staff and tutors, or tutors to the relevant Local Authority and Disclosure and Barring Service as appropriate

- Ensure accurate records of all safeguarding concerns and the secure storage of all safeguarding records
- Provide a quality assurance and review function for all safeguarding concerns
- Work with all the above governance bodies to inform of serious or untoward safeguarding incidents as appropriate
- Ensure the adoption, implementation and auditing of all policies and strategies in relation to safeguarding
- Liaise with school Designated Safeguarding Leads on matters of safety and safeguarding, in particular online and digital safety involving ABC Education Limited tutors, when deciding whether to make a referral to the relevant agencies

### **Designated Safeguarding Officer**

Name: Claire McAvoy

Phone: 01420 610147

Email: [safeguarding@abctutoring.co.uk](mailto:safeguarding@abctutoring.co.uk)

### **Deputy Designated Safeguarding Officer**

Name: Allicia Buckle

Phone: 01420 610147

Email: [safeguarding@abctutoring.co.uk](mailto:safeguarding@abctutoring.co.uk)

Further information on the role and responsibilities of the Designated Safeguarding Lead, Deputies and Champions in the context of schools can be found in the statutory guidance KCSIE 2023, Annex C.

#### 13.4 ABC Education Limited Staff and tutors and Tutors

All ABC Education Limited staff and tutors have a shared responsibility to safeguard and promote the welfare of children and young people. They should know how to recognise, respond to, report and record any safeguarding concerns.

All staff and tutors and tutors are responsible for following the organisation's safeguarding procedures for reporting any concerns relating to abuse or neglect or suspected abuse or neglect of any child or young person immediately.

In an emergency staff and tutors and tutors will be expected to report urgent concerns directly to the relevant statutory agency.

## 14. COMPLAINTS

If a complaint is identified as a potential safeguarding concern, then the Safeguarding Procedures will be followed.

## 15. QUALITY ASSURANCE AND REVIEW

ABC Education Limited is committed to striving for excellence in the provision of all its services. We do this by actively reviewing the safeguarding systems in place.

We use an electronic recording system to capture all relevant data that supports the evidencing and monitoring of compliance in safeguarding. This quality assurance mechanism is a crucial and integral part of the governance structure.

The leadership team will review the safeguarding policy and supporting procedures annually to ensure they continue to reflect legislation and guidance. Any amendments to the policy and supporting procedures will be submitted to the Directors for approval.

## 16. UNDERPINNING LEGISLATION AND GUIDANCE

### 16.1 Legislation

- Children Act 1989
- Human Rights Act 1998
- United Nations Convention on the Rights of the Child, 1991
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- The Forced Marriage (Civil Protection) Act 2007
- The Equality Act 2010
- Children and Families Act 2014
- Anti-Social Behaviour, Crime and Policing Act 2014
- Modern Slavery Act 2015
- Counter Terrorism and Security Act 2015
- Children and Social Work Act 2017
- Data Protection Act 2018
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021
- Children's Code (issued under S125 DPA 2018, effective Oct 2021)

### 16.2 Guidance

- What to do if you're worried about a Child is being Abused, 2015



- Child Sexual Exploitation Guidance 2017
- Information Sharing Advice for Safeguarding Practitioners 2018
- Working Together to Safeguard Children 2018 places a general duty on schools to work and cooperate with other agencies to safeguard and promote the welfare of children. ABC Education Limited is committed to do this by having an open, honest and transparent line of communication.
- Guidance for Safer Working Practice for those working with children and young people in education settings, May 2019

This document is an update by the Safer Recruitment Consortium of a document previously published for schools by the Department for Education and Skills (DfES). It was initially issued as those working with children had expressed concern about their vulnerability and requested clearer advice about what constitutes illegal behaviour and what might be considered as misconduct. Education staff and tutors asked for practical guidance about which behaviours constitute safe practice and which behaviours should be avoided. This safe working practice document is NOT statutory guidance from the Department for Education (DfE); it is for employers, local authorities and/or the Three Safeguarding Partners to decide whether to use this as the basis for their code of conduct / staff and tutors behaviour guidelines.

An addendum was published in response to Covid-19 in April 2020.

- Keeping Children Safe in Education 2023 (KCSIE) is statutory guidance issued from the Department for Education under Section 175 of the Education Act 2002. Schools and colleges must have regard to this when carrying out their duties to safeguard and promote the wellbeing of children.
- Sexual violence and sexual harassment between children in schools and colleges 2021 – the advice provided by the DfE sets out what sexual violence and sexual harassment is, how to minimise the risk of it occurring and what to do when it does occur or is alleged to have occurred.
- Children’s Code is a statutory code of practice that articulates how online services likely to be accessed by children should comply with the UK GDPR when using children’s data. The code was prepared under s121 of the DPA 2018 and issued under s125 of DPA 2018, coming into effect on 5 October 2021.

## Appendix A

### ABC Education Limited Safeguarding Concern Form

## Appendix B

### Guidance on completing the Safeguarding Concern Form

It is important that this concern form is fully completed in a timely manner. The details are important. To help the Designated Safeguarding team respond and refer appropriately you should follow the guidance below.

- Only write about one child on each form
- Remember that concern forms are used in court cases and inquests as evidence.
- Make sure you use the ABC Education Limited Safeguarding Concern Form to record your concerns/disclosure.
- If you cannot access a copy of the Safeguarding Concern Form then contact the Designated Safeguarding Officer (or Deputy) as soon as you are able to who will supply the form for you
- Please alert the team as soon as possible. It can take several hours to deal with even urgent concerns and the earlier we start the better

Signed

Claire McAvoy

Director

A handwritten signature in black ink, appearing to read 'CMcAvoy', written in a cursive style.

Allicia Buckle

Director

A handwritten signature in black ink, appearing to read 'ABuckle', written in a cursive style.

19<sup>th</sup> March 2024

Review date 18<sup>th</sup> March 2025.