

CHILD PROTECTION AND SAFEGUARDING POLICY

Tutelage Education Group Inc.

Updated - 20th of July 2021

INTRODUCTION

All children and young people have the right to a childhood free from abuse, neglect and exploitation. Tutelage Education Group is committed to the highest standards in all matters relating to child protection and safeguarding as well as the general welfare of our students, both in and out of the classroom.

All adults that interact with children, in any capacity, have a duty of care and this is doubly true in an educational context. This is important, not only to protect the children they work with, but also to allow them to have a safe environment in which they can feel safe and supported so that they can fully thrive.

This policy is intended to set out and explain our policies as well as provide behavioural guidelines, and a framework for Tutors, Students and Families to ensure that the highest standards are maintained in every interaction, along with the safety and wellbeing of everyone involved. Primarily, we want to ensure that children have a safe space in which to learn and to prevent those who might wish harm on our students from putting them in any form of danger.

OUR PROMISE

We promise that, whilst in our care, we will do our utmost look out for the wellbeing and safety of all of our students. If we see something that we don't think is right or appropriate, we will speak out, and always advocate for the rights of the young people in our care. We hope to be champions for our students, advocates and to lead by example at all times.

In order to achieve this, we will :

- Ensure that every adult that works with, or on behalf of, our students is capable, qualified and responsible
- Make sure the every adult involved with Tutelage Education is aware that they are responsible for their own actions and encourage them to always behave to the highest standards of professionalism, primarily by adhering to Tutelage's code of conduct
- Provide clear procedures for Tutors and other employees to report any concerns

GENERAL SAFEGUARDING PRINCIPLES

Tutelage Education is guided by the 6 principles of safeguarding, as set out in the UK Government's 2014 Care Act.

The UK Government created these six safeguarding principles especially for the health and social care sector to help better protect adults, but they are equally applicable to the safeguarding of children. Safeguarding both adults and children is about preventing the risk of harm from abuse or exploitation or having the ability to reduce it by raising awareness and supporting people in making informed decisions.

1. Empowerment

Ensuring people are supported and confident in making their own decisions and giving informed consent.

Empowerment gives individuals choice and control over decisions made.

2. Protection

Providing support and representation for those in greatest need.

Organisations can put measures in place to help stop abuse from occurring and offer help and support to those at risk

3. Prevention

It is crucial to try and take action before harm occurs, preventing neglect, harm or abuse is the primary objective.

Prevention is the act of organisations working to stop abuse before it happens. Raising awareness, training staff and making information easily accessible are all ways that they can demonstrate prevention measures and encourage individuals to ask for help.

4. Proportionality

We must take a proportionate and least intrusive response to the issue presented.

Proportionality ensures that services take each person into account when dealing with abuse. They will respect each individual and assess any risks presented.

5. Partnerships

Forming partnerships with local communities can create solutions as they can assist in preventing and detecting abuse.

Partnerships give organisations the opportunity to work together, as well as with the local community.

6. Accountability

Being accountable and having complete transparency in delivering safeguarding practice.

Safeguarding is everyone's business and accountability makes sure that everyone plays their part when it comes to safeguarding vulnerable people. Everyone is accountable for their actions as individuals, services and organisations.

Further to this, it is also important to state one of our own core beliefs :

All children, regardless of age, disability, gender reassignment, race, religion or belief, sex or sexual orientation, have the right to equal protection from all types of harm or abuse

Tutelage Education tolerates no form of discrimination either towards or from our students, and our safeguarding policy is designed to ensure that all students, staff and adults associated with Tutelage treat each other and are themselves treated with respect at all times, and in all situations.

DEFINITIONS OF ABUSE

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 effect on the behaviour and emotional development of that child.

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.

Extremism: A vocal or active opposition to fundamental human values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

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.

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.

RECRUITMENT AND TRAINING

Tutelage Education strives to maintain a high standard in recruiting staff and independent contractors. All Tutelage Education employees and contractors will be subject to an enhanced background and/or criminal record check before they can begin working with any of our students. Every contractor and employee must be able to fulfil one of the following:

- Have an existing enhanced background and/or criminal record check not more than 2 years old verified by a member of Tutelage Education senior staff, with the disclosure number and date of issue recorded, along with photographic ID.
- Arrange with Tutelage Education to have a new enhanced background and/or criminal record check processed and paid for by Tutelage Education

Tutelage Education staff and contractors receive training on the contents of this policy as part of their induction, this policy is made available to all adults involved in Tutelage Education's activities, so that they fully understand their responsibilities in relation to safeguarding.

Tutelage Education offers training in Online Safety and Child Protection in Education through educare.co.uk to all staff and contractors before they start working with students.

Tutelage Education is committed to the continuing professional development of its staff, in all areas of their careers, but none more so than in Safeguarding and Child Protection. To this end, Tutelage will offer funding for any staff member who wishes to undertake a course in Safeguarding, Child Protection or any related areas, in order to better provide support and protection for our students.

AIMS OF ANY SAFEGUARDING INVESTIGATION

We take any reports of inappropriate behaviour, whether by our staff, contractors or a third party, very seriously. With this in mind, we are also aware that a Safeguarding Investigation is challenging for all parties involved and we are committed to treating all everyone with fairness, respect and consideration.

In the first instance, all investigations will be conducted by the relevant Authorities, as noted below in our Reporting Procedures. If it is appropriate, and with the permission of the relevant Authorities, the DSO may decide to investigate any allegations, in order to apply our own policies and disciplinary procedures.

Throughout any internal or external investigations we will aim to:

- Put the safety, protection and wellbeing of any victims above all else
- Gather evidence and render an impartial judgement, based solely on the facts
- Make sure our response takes the needs and safety of the person experiencing abuse, and any bystanders into account
- Provide a full and detailed report to the parties involved, explaining the reasoning behind our decisions and any further action taken

ONLINE SAFEGUARDING PRINCIPLES

Providing educational services online is an excellent way to expand your reach and help as many students as possible, which is one of Tutelage's fundamental aims. However, it comes with its own pitfalls and requires extra vigilance when dealing with Safeguarding issues.

As we stated above, we believe that children and young people should never experience abuse, neglect or exploitation of any kind. Furthermore, we are passionate about children being given the opportunity to use the and explore internet for education and personal development, but safeguards must be in place to ensure they are kept safe at all times

PROTECT AND EDUCATE

We feel that it is important to recognise that:

- The online world provides everyone with many opportunities. However, it can also present risks and challenges
- We have a duty to ensure that all children, young people and adults involved in our organisation are protected from potential harm online
- We should educate children, young people and adults within our organisation (and the wider world) to use the internet in a safe and respectful manner, focusing on personal security online and courteous behaviour towards others
- We believe that the best outcomes are achieved by working in partnership with children, young people, their parents, carers and other agencies in order to promote young people's welfare and in helping young people to be responsible in their approach to online safety

To support these dual aims we commit to :

- Appointing an Online Safety Coordinator to work in conjunction with our Designated Safeguarding Officer
- Providing clear and specific directions to staff and contractors on how to behave online through our code of conduct for Tutors
- Encouraging the young people using our services to use the internet, social media and mobile phones in a way that keeps them safe and shows respect for others
- Encouraging parents and carers to do what they can to keep their children safe online
- Only conducting online lessons through our company platform on Bramble. In the event of having to find alternative solutions for any reason, we will only use trusted secure platforms (e.g. Skype, Zoom)

- Notifying parents to any such changes in advance, where possible
- Allowing parents and administrators full access to lessons, in an observatory capacity, at no notice (provided they are not disruptive to the learning environment)
- Providing resources for students, tutors, parents and carers to allow them to learn more about online safety
- Continually reviewing and updating our policies on online safety and security
- Reviewing and updating the security of our information systems regularly
- Reaffirming our commitment to ensuring personal information about the adults and children who are involved in our organisation is held securely and shared only as appropriate
- Ensuring that images of children, young people and families are used only after their written permission has been obtained, and only for the purpose for which consent has been given
- Providing adequate oversight as well as specific support and training for staff and contractors regarding online safety
- Examining and risk assessing any social media platforms and new technologies before they are used within the organisation
- Providing support and training specifically designed for online situations for all staff and volunteers on dealing with all forms of abuse, including bullying/cyberbullying, emotional abuse, sexting, sexual abuse and sexual exploitation

If online abuse occurs, we will respond to it by:

- Using our robust procedures to enable us to respond appropriately to any incidents of inappropriate online behaviour or abuse, whether by an adult or a child/young person
- Reviewing the plan developed to address online abuse at regular intervals, in order to ensure that any problems have been resolved in the long term
- Conducting a specific case review, to see if there were any shortcomings in our protection and reporting procedures and find ways to improve them

RECORDING SESSIONS

Our online tutoring sessions are recorded for both safeguarding and reference purposes. These recordings are held by our platform providers at Bramble.io and are subject to their content and privacy policies.

Students and Parents are able to set up their own Bramble accounts and access or ask for copies of the recordings of their lessons.

We send PDFs of each lesson to the Student or Parents periodically, so that they can be confident that the lessons are being conducted to a sufficient standard. We are able to provide them with the recordings of lessons on request.

As noted above, we welcome any parents dropping in on lessons, either remotely or in person. We want you to be confident that your child is being treated properly and that they are receiving the high quality service that you expect, and we feel that unannounced drop-ins, by both parents and senior staff at Tutelage are one of the best ways of ensuring this. When dropping in, you are welcome to ask any relevant questions of the tutor, but we do ask that you allow the lesson to continue in as unimpeded a fashion as possible.

INTERNATIONAL NORMS

Online tutoring often lends itself to a more international and diverse clientele than simple in-person lessons. We are aware that different parts of the world are subject to different cultural norms and will do our best to respect those when it comes to providing high quality services and connecting tutors with clients.

However, we will not at any point compromise our core beliefs of equality and fairness for all, nor will we dilute our stringent safeguarding principles in order to fit different cultural norms. If we see abuse happening, we will report it, regardless of location or any other factors.

REPORTING PROCEDURES AND DATA PROTECTION

IN ALL CASES RELATED TO CHILD PROTECTION AND SAFEGUARDING, the main procedure is to treat the allegation seriously, in strict confidence and immediately contact the Tutelage Education Designated Safeguarding Officer. Once the DSO is contacted, the following protocol will be followed:

1. Tutelage will contact the appropriate Police Child Protection Unit or the Social Services Department of the relevant Local Authority (the Authorities). This is most likely to be located in the jurisdiction where the victim is located, but we may also choose to involve Authorities in other jurisdictions or international organisations, if appropriate. Tutelage Education shall support the Authorities with any investigation and shall undertake to provide them with any reasonable assistance or document
2. Tutelage shall not undertake any independent investigation or questioning (as this may jeopardise any enquiry) unless or until Tutelage Education is given authorisation by the Authorities. Following authorisation, Tutelage Education may independently follow up on the allegation
3. All allegations or suspicions shall be referred to the Authorities no matter how insignificant they seem to be or when they occur. Any information about suspicious behaviour or circumstances will be passed to the local Police Child Protection Unit or the local Social Services within 24 hours or as soon as shall be reasonably practicable

IN THE EVENT THAT A YOUNG PERSON DISCLOSES ABUSE TO AN EMPLOYEE OF TUTELAGE EDUCATION OR A CONTRACTOR

Staff of Tutelage Education and contractors shall:

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

6. Immediately after a disclosure, contact the Designated Safeguarding Officer at Tutelage Education
7. Report the facts to the DSO as soon as you are able, as you know them/ or understand them, including the pupil's name and the account given to you by the young person using the words that they used as well as including any other information your feel is relevant
8. Tutelage Education shall retain a copy of all such notifications in accordance with applicable Data Protection guidelines

IN THE EVENT THAT A TUTOR SUSPECTS ABUSE, BUT IT HAS NOT BEEN DISCLOSED BY THE YOUNG PERSON

Staff of Tutelage Education and contractors shall:

1. Report the facts as you know them/ or understand them, including the pupil's name and the account given to you by the young person using the words that they used as well as including any other information your feel is relevant
2. Do not discuss your suspicions with the young person in question or conduct any form of independent investigative work
3. Provide this detailed information to the DSO at Action Tutoring as soon as you are able
4. Tutelage Education shall retain a copy of all such notifications in accordance with applicable Data Protection guidelines

IF YOU RECEIVE AN ALLEGATION ABOUT ANY ADULT OR ABOUT AN EMPLOYEE OF CONTRACTOR OF TUTELAGE EDUCATION (INCLUDING THE PERSON HEARING THE ALLEGATION)

Staff of Tutelage Education and contractors shall:

1. Immediately after receiving an allegation or disclosure, contact the Designated Safeguarding Officer at Tutelage Education
2. Do not conduct any form of independent investigative work
3. Report the facts to the DSO as soon as you are able, as you know them/ or understand them, including the pupil's name and the account given to you by the young person using the words that they used as well as including any other information your feel is relevant
4. Tutelage Education shall retain a copy of all such notifications in accordance with applicable Data Protection guidelines

IF YOU DEAL WITH THE PERSONAL DATA OF YOUNG PEOPLE (including names, grades and school)

Staff of Tutelage Education and contractors shall:

1. Handle all information with sensitivity and confidentiality and in accordance with applicable Data Protection guidelines
2. The information should be kept securely and not be made available to others without the authority of Tutelage Education

DESIGNATED SAFEGUARDING OFFICER AND INDEPENDENT SAFEGUARDING OMBUDSMAN

Tutelage Education has a Designated Safeguarding Officer to:

- Offer support and training to all staff and contractors involved in Tutelage Education's work
- To ensure that all Tutelage Education staff and contractors are sufficiently vetted
- To act as the main point of contact in the event of any allegation or disclosure
- To act as the as the main point of contact between Tutelage Education and outside stakeholders
- Report any instances of abuse or inappropriate behaviour to the relevant Authorities and act as their liaison for any follow up enquiries

If there is an allegation, if signs and indicators of abuse are identified or if at any point an adult involved with Tutelage Education's work fails to comply with any element of the Code of Conduct this information must be passed immediately to Tutelage's Designated Safeguarding Officer.

It is the Designated Safeguarding Officer's responsibility to collect all relevant information and make decisions on how to proceed. You have a duty of care to pass on all relevant information regarding any allegations of abuse, or identified signs and indicators of possible abuse.

The Independent Safeguarding Ombudsman will take over the place and duties of the Designated Safeguarding Officer in the following circumstances :

- If the DSO is unable to fully investigate due to any potential conflict of interest
- If the DSO is the person making or reporting the allegation

Additionally, if the allegations directly relate to the Designated Safeguarding Officer's behaviour then the report should be directly made to the ISO, bypassing the usual Reporting Policy.

Finally, if a complainant or person involved in an investigation is dissatisfied with the manner in which Tutelage and the DSO are conducting the investigation, they may request for the file and investigation to be passed on to the ISO for review.

POLICIES FOR TUTELAGE/ CODE OF CONDUCT

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

You must:

- Treat all young people with respect and kindness
- Remember that someone else might misinterpret your actions, no matter how well intentioned
- Recognise that special caution is required when discussing sensitive issues with young people
- Challenge unacceptable behaviour and report all allegations/suspicions of abuse to the Tutelage Education's Designated Safeguarding Officer
- Operate within Tutelage Education's procedures in the event of any disclosure/concern.
- Report any concerns about child protection and safeguarding with Tutelage Education's Designated Safeguarding Officer

- Only conduct online tutoring with their pupils at the pre-arranged tutoring times and dates and will keep Tutelage Education informed of any changes to those times and dates
- Conduct online tutoring either in a workplace or location that does not expose personal information or access to inappropriate background content
- Dress appropriately in a manner that would be suitable for their attendance at a school in person
- Keep their video stream 'on', where possible, during their sessions
- Never disclose their phone, email or other communication details with their pupil nor request their pupils' details through the online platform
- 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 Tutelage Education
- Consent to the recording and safe storage of online sessions. This is for reference and safeguarding purposes only
- Consent to the monitoring of all online sessions by Tutelage Education staff either live during the tutorial or afterwards in a systematic random review of safeguarding procedures
- Consent to the potential monitoring of all online sessions by the parents or guardians of the student in question
- Be aware that social networking sites are in the public domain if not protected by privacy settings. Strongly consider strengthening any privacy settings so that young people would not be able to access your online profiles and be privy to any information you would not want in the public domain
- Block any young people that approach you online and inform Tutelage Education's Designated Safeguarding Officer immediately
- Report any adult working with young people through Tutelage Education to the Designated Safeguarding Officer if you have reason to believe that they are not abiding by this Code of Conduct or our Child Protection and Safeguarding Policy

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, or, seek out their personal contact details
- Arrange to meet a young person outside of the allocated tutoring time
- Act in a manner that excludes the young people you are working with
- Make suggestive or derogatory remarks in front of young people
- Have inappropriate physical contact or verbal contact with young people
- Show favouritism to any individual
- Share any links to online content or websites that contain anything other than educational resources that directly link to the content of their sessions. If in doubt of the validity of any websites or material please get in contact with the Tutelage Education team
- Be under the influence of alcohol or other substances when working on activities involving young people
- Record video, still images or audio of any students or tutoring sessions
- Take any screenshots of sessions

Please be aware that any breaches of this Code of Conduct or our Child Protection and Safeguarding Policy will be taken very seriously and fully investigated. Serious breaches will be referred to the relevant Authorities. Non compliance with or breaches of either

this Code of Conduct or of our Child Protection and Safeguarding Policy is grounds for dismissal or termination of contract.

POLICIES FOR STUDENTS/CODE OF CONDUCT

We expect that our students behave properly during lessons, and take their time with Tutelage Education seriously. Both for their own benefit and safety and that of those around them.

Please note that students can initiate contact and register interest with Tutelage Education but cannot start using our services until a sponsor/parent/guardian/carer over the age of 18 has formally agreed to be the formal sponsor and to hold legal relationship with the site.

The student must :

- Treat the Tutor with respect and fairness, and not subject them to abusive behaviour or language
- Report any dispute with a Tutor to a parent/responsible adult
- Report any inappropriate behaviour or illegal activity by a Tutor within a session to a parent/responsible adult
- Only receive online tutoring at the designated tutoring times and dates arranged in advance with Tutelage Education
- Be dressed appropriately in either their uniform or appropriate attire for attendance at a school event
- Pupils will conduct online tutoring either in a workplace or location that does not expose personal information
- Keep their video stream 'on', where possible, during their sessions
- Have any mobile phones on silent and out of gaze during sessions, or completely away
- Consent to the recording and safe storage of online sessions. This is for reference and safeguarding purposes only
- Consent to the monitoring of all online sessions by Tutelage Education staff either live during the tutorial or afterwards in a systematic random review of safeguarding procedures
- Consent to the potential monitoring of all online sessions by their parents or guardians

The student must not :

- Have any inappropriate communication with the Tutor outside the lesson session
- Make any improper suggestions to the Tutor
- Record video, still images or audio of any tutoring sessions
- Disclose their phone, email or other communication details with their Tutor nor request those of their Tutor through the online platform
- Share any links to online content or websites that contain anything other than educational resources that directly link to the content of their sessions
- Take any screenshots of sessions without prior permission from the tutor

POLICIES FOR PARENTS, GUARDIANS AND FAMILIES/ CODE OF CONDUCT

We expect the parents, guardians and families to take an active role in their child's educational journey. They should always look out for their child's best interests and we aim to work with them to allow their child the best chance of success.

The parent/responsible adult must:

- Be responsible for the final selection of the Tutor and make any reasonable checks to ensure the tutor is suitable for the Student
- Ensure the Student is fully aware of Tutelage Education's Child Protection and Safeguarding Policy as well as the Student Code of Conduct
- Ensure the the Student follows the Child Protection and Safeguarding Policy as well as the Student Code of Conduct
- Inform Tutelage Education, in advance, of any changes made to the time and date of any lessons
- Always be responsible for the welfare of the Student during the session
- Always be responsible for the physical environment of the Student during the session ensuring it is safe and appropriate
- If they consider it appropriate, be present or available during a tutor session so any concerns encountered by the Student can be reported as soon as possible and ensure the Student and Tutor are behaving in an appropriate manner
- Treat the tutor with respect and fairness, and not subject them to abusive behaviour or language
- 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
- Ensure the Student has no inappropriate communication with the Tutor outside the lesson session
- Assume responsibility for passing on any disputes or concerns of illegal or inappropriate behaviour by the Tutor that they are made aware of by the Student
- Immediately report any inappropriate behaviour or illegal activity by a Tutor to the Designated Safeguarding Officer
- Immediately report any unsolicited communications between the Tutor and Student to the Designated Safeguarding Officer
- Report any dispute with a tutor to the Designated Safeguarding Officer
- Consent to the recording and safe storage of online sessions. This is for reference and safeguarding purposes only
- Consent to the monitoring of all online sessions by Tutelage Education staff either live during the tutorial or afterwards in a systematic random review of safeguarding procedures

The parent/responsible adult must not:

- Have any inappropriate communication with the Tutor outside the lesson session
- Make any improper suggestions to the Tutor
- Record video, still images or audio of any tutoring sessions
- Solicit the Tutor for further lessons rather than arranging them through Tutelage Education, in accordance with our Terms and Conditions

Please be aware that any breaches of this Code of Conduct or our Child Protection and Safeguarding Policy will be taken very seriously and fully investigated. Serious breaches will be referred to the relevant Authorities. Non compliance with or breaches of either

this Code of Conduct or of our Child Protection and Safeguarding Policy is grounds for immediate termination of services.

CONTACTS

For any further questions, or to report any concerns please contact either :

Tutelage Education's Designated Safeguarding Officer –

Caitlyn Tysoe

Email – cait@tutelage-education.com

Phone – (+1) 209 3535 302

Tutelage Education's Online Safety Coordinator –

David Tysoe

Email – david@tutelage-education.com

Phone – (+33) 6 67 21 81 86

Our Independent Safeguarding Ombudsman –

Susan Wherry

Email - safeguarding@tutelage-education.com

This policy will be reviewed annually or in line with UK or US Government guidance