



ONLINE TUTORING SAFEGUARDING POLICY

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Effective from: June 2020

Date last revised: n/a

Approved by: Trustees

Review date: June 2021

Contact person: Alexandra Charalambous

1. Context

This Online Tutoring Safeguarding policy was devised in conjunction with The Children's Literacy Charity's (the Charity) Safeguarding policy. The main Safeguarding policy draws upon duties conferred by new statutory guidance (July 2016) "Keeping children safe in education" as well as previous Children Acts and guidance contained in "Working Together to Safeguard Children"; "What To Do If You're Worried A Child Is Being Abused". These policies are applicable to all on and off-site activities undertaken by pupils whilst they are the responsibility of the Charity.

1.1 This policy also draws on the new statutory guidelines (May 2020, Gov.uk) 'Safeguarding and Remote Education'.

1.2 This policy should be read alongside the Safer Recruitment, Safeguarding Behaviour, Whistleblowing and Bullying and Harassment policies which together make up the charity's approach to safeguarding.

1.2 This policy is reviewed annually.

1.3 This policy has been drawn up on the basis of law and guidance that seeks to protect children, namely:

- Children and Young Persons Act (1933)
- The Children Act (1989)
- Human Rights Act (1998)
- Education Act (2002)
- Adoption and Children Act (2002)
- Children Act (2004)
- Safeguarding Vulnerable Groups Act (2006)
- Childcare Act (2006)
- Common Law Duty of Care
- The Equality Act 2010
- Children and Families Act 2014
- Counter-Terrorism and Security Act 2015
- Protection of Children Act 1978, amended by section 45 of the Sexual Offences Act 2003

1 Definitions

1.2 As set out in guidance from the Safe Network (www.safenetwork.org.uk) this policy uses the terms 'safeguarding', 'promoting children's welfare' and 'child

protection' consistently with *Working together to safeguard children 2015*. This defines safeguarding as:

- protecting children from maltreatment
- preventing impairment of children's health development
- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care, and
- taking action to enable all children to have the best life chances

1.3 Child protection is part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

2 Scope

2.2 This policy and guidance applies to all staff, including senior managers and the board of trustees, volunteers, students or anyone working on behalf of the charity.

2.3 Children's protection and safeguarding is everyone's responsibility.

3 Policy statement

3.2 The purpose of this policy is to

- protect children and young people who receive the charity's online teaching services
- protect staff with senior managers who will be teaching online
- provide staff with the overarching principles that guide our approach to child protection and safeguarding.

3.3 In addition to the information in this document all staff and volunteers should follow the:

- Safer Recruitment policy
- Code of behaviour for working with children and young people
- Whistle Blowing policy

All of which can be found in the charity policies file in you place of work or on the charity server under All Schools

4 Roles and Responsibilities

4.2 The trustee responsible for safeguarding is Mr Andrew Martin.

4.3 Alexandra Charalambous, Head of Educational Development, is the Designated Safeguarding Lead. She has undergone the following training courses:

- Child Protection Level 2 (EduCare Learning Ltd, 9th May 2018)
- Awareness of Prevent Duty (in previous role)
- Designated Safeguarding Lead Training (JH Child Protection Training Ltd, 20th June 2019)

- National Online Safety - Understanding your Statutory Duties and Effectively Supporting Parents and Carers during Lockdown, Webinar, June 2020)

She will undertake safeguarding training every two years and receives annual updates.

- 4.4 Every school setting will also have a designated safeguarding contact. Staff and volunteers must always be aware of who the Senior and Deputy Designated Professionals are in the school setting in which they work.
- 4.5 All the charity staff and volunteers receive safeguarding training at Induction followed by annual updates. All Disclosure and Barring Services (DBS) checks are renewed on a three-yearly basis, if appropriate in accordance with the guidelines of the Disclosure and Barring Service.
- 4.6 All staff will receive Online Safeguarding Training and receive this policy prior to begin teaching online.

E-Safety

As technology is a fast-paced environment, the way in which risk culminates can change. There are a myriad of potential online risks and it would be impossible to go into significant depth for all. In the context of the charity, online safety is predominantly about safeguarding.

- 4.7 The statutory areas to consider are:
 - **Child sexual exploitation** – *the internet predator, online bullying*
At a simplistic level, online bullying or cyber bullying is the use of digital or online technology to bully, harass, or intimidate someone. It is the systematic targeting of a person to cause physical or mental trauma. A good rule of thumb is to think of the anti-bullying mnemonic STOP - which is **Several Times On Purpose**. Online bullying is not young people having a public falling out online; that is considered to be a low-level behavioural issue, although it can sometimes be a trigger to more serious bullying. Online bullying can take many different forms, from the relatively easy to spot - such as abuse and threats on public social media or websites - to the more difficult to uncover such as private messaging apps, and online gaming conversations.
 - **The role of technology in sexualised behaviour – sexting**
Sexting is a term that refers to sending explicit or provocative material online, usually a fully or partially naked image, although it can refer to messages of a sexual nature too. The law is very clear in that the creation, storage, and distribution of child abuse images (sometimes incorrectly referred to as child pornography, particularly by the media) are criminal offences, falling under Section 1 of the Protection of Children Act 1978, amended by section 45 of the

Sexual Offences Act 2003 to extend the definition of children from under 16s to under 18s.

4.8 REMEMBER:

An indecent or sexually explicit image of a person under the age of 18 (a child) is ILLEGAL.

NEVER:

- Copy or share the image
- Show the image to others –staff and volunteers must use their own judgement as to whether an image is sexually explicit or not.

Radicalisation

4.9 The Counter Terrorism and Security Act 2015 places a duty on specified authorities including local authorities and child care, education and other children's services providers to have due regard to the need to prevent people from being drawn into terrorism.

This is dealt within the Prevent Duty (see main Safeguarding Policy)

5.0 Mental Health and Wellbeing

Children and young people may be worried about the impact of coronavirus, social distancing or self-isolation. Those who already have mental health difficulties such as anxiety might be finding things particularly tough. If children raise their concerns or worries on these matters, tutors will be able to provide reassurance and pass on any concerns to the school and the Safeguarding Lead.

5.1 Observations/Recording of Online Teaching sessions

- Schools Programme Managers may watch online sessions without being required to request permission for monitoring and training purposes, but it is advisable to let the staff member and parent/carer know as a courtesy.
- All recordings (including voice and video) for any internal (i.e. training, development, safeguarding) or external (i.e. marketing) purpose, must have pre requested written permission before recording commences from the parent/ guardian using our online permission forms.
- Recordings will be deleted once monitoring has occurred. Permission forms agree records can be kept for up to five years.

5.2 Use of Mobile Phones

- Staff are not permitted to use personal mobile phones whilst working with a child. These should be switched off or silent during working hours. Personal mobile phones must never be used to take or store images or recordings of any children.

5.3 E-security

- If staff are using a personal device for company purposes, we recommend to ensure that they are using a Windows10/Mac OSX and apply the security updates when made available for these systems. In addition to the built in endpoint protection present with Windows Defender and MAC OSX we can also recommend using third party antivirus tools as an added safety net.
- If a member of staff leaves the organisation, all company linked tools must be removed from the personal device prior to leaving their role.
- No sensitive company data should ever be stored locally on personal devices, this includes any data stored in cloud locations required for use in the employees' role.
- No images or recordings of children should be taken and stored on any personal device.
- Data controllers need to reassure themselves that any contact with software and/or platforms selected are suitable and raise no privacy issues; or use cases against the provider's terms and conditions.

6 Guidelines for Online Tutoring

The guidelines that follow in this section apply to all members of staff and volunteers who will be teaching online with children and young people.

- 6.1** We aim to ensure that all those working for, and volunteering with, the charity have clear direction on what to do if they have any concerns that a child is in need of protection.
- 6.2** We aim to ensure that all children supported by the charity and any other children who may come to the attention of the charity staff and volunteers receive the protection and support they need if they are at risk of abuse.

6.3 The responsibility of the Tutor is to:

- Ensure that their environment does not display any inappropriate images or documentation capable of being viewed by the children or parent/carer when conducting a session. Change your background to a blank or coloured screen if possible.
- Ensure no personal information about yourself is visible, including closing down other websites that are not relevant to the session.
- Remain vigilant, ensure no one else is present/visible in your own or the child's background that should not be.
- Request children are dressed appropriately for their session if in their home environment.
- Treat children fairly and without prejudice or discrimination; children who have a disability or come from a minority ethnic or cultural group can easily become victims of discrimination and prejudice which may be harmful to the child's well-being.
- Always ensure language is appropriate and not offensive or discriminatory.
- Ensure any contact with the child is appropriate to their role as a tutor and confined to the relevant online session.
- Not make any improper suggestions to a child.
- Not send unsolicited communications to the child or parent/carer.
- Value and take children's contributions seriously and ensure that children value and respect each other's contributions.
- Report any dispute with a child or parent/carer to the Designated Safeguarding Lead (DSL), in accordance with the Safeguarding procedures document.
- Report any inappropriate behaviour or illegal activity identified within an online session by the child or third party, in accordance with procedures set out in Safeguarding procedures.
- Ensure that parent/carer is present at the start of the online session that the child is comfortable to continue the session; if not, they can terminate the session.
- Tutors must not share any personal details with children or their families.

- Tutors could record the session, ensuring that they have told the children and their parents that they will be doing that.
- Follow all safeguarding instructions provided and end a session immediately if a child behaves inappropriately.

6.4 The responsibility of the school/teachers or school representative is to:

- Be responsible for the welfare of the child during the session.
- Be responsible for the physical environment of the child during the session, ensuring that it is safe and appropriate.
- Be responsible for the behaviour of the child during the session, ensuring that tutors will be treated with respect and fairness and will not be subjected to abusive behaviour or language.
- Ensure that no improper suggestions are made by either the tutor or child.
- Be present or available for the child during the session to address any issues.
- Report any dispute with a tutor to the DSL in accordance with procedures set out in this document.
- Report any inappropriate behaviour or illegal activity by a tutor within a session in accordance with procedures set out in this document.
- If the online session has been arranged by the school but takes place outside school hours and away from school premises, it is the responsibility of the school to make the appropriate parent/carer aware of the Safeguarding Policy and that both parties agree their safeguarding responsibilities.

6.5 The responsibility of the parent/carer is to (when tutoring online is in the child's home):

- Always be responsible for the welfare of the child during the session.
- Always be responsible for the physical environment of the child during the session ensuring it is safe and appropriate.
- Be present or available during a tutor session so any concerns encountered by the child can be reported as soon as possible and ensure the child and tutor are behaving in an appropriate manner.
- Always be nearby when the lesson takes place but are not expected to directly take part in the lesson.
- Announce their presence to the tutor at the start of the lesson.
- If a parent/carer is not present at the start of the lesson then the lesson may be terminated by the tutor. The child may then re-join once an adult is present.
- Other children are not allowed to be present during lessons.
- The child should receive lessons in a shared family space and not in a child's bedroom, unless there is no alternative
- Consider where your child's session is being held, check personal information about the family or photos in the background that you may not want others to see

- Ensure that tutors will be treated with respect and fairness by the child and will not be subjected to abusive behaviour or language.
- Ensure that no improper suggestions are made by either the tutor or child.
- Ensure the child has no inappropriate communication with the tutor outside the online session.
- Personal devices: add appropriate child locks/filters, and check/clear your internet browser history as required.
- Report any unsolicited communications between the tutor and child if appropriate.
- Report any dispute with a tutor to the Charity's DSL in accordance with procedures set out in this document.
- Report any inappropriate behaviour or illegal activity by a tutor in accordance with procedures set out in this document.

Useful numbers

Alexandra Charalambous - Designated Safeguarding Lead (DSL)
07857 048568

Beata Gawthrop - Deputy Safeguarding Lead
07706 729715

Claudette Taylor - Deputy Safeguarding Lead
07971 451532

CEOP – National Crime Agency
0370 496 7622
communication@nca.gov.uk

NSPCC Child Protection helpline
0808 800 5000

NSPCC whistle-blowing helpline
0800 028 0285

Southwark Local Safeguarding Board
Tel: **020 7525 1921**
Out of hours: **020 7525 5000**

Lambeth Local Safeguarding Board
Tel: **020 7926 5555**

Westminster Local Safeguarding Board
Tel: **020 7641 4000**
Out of hours: **020 7641 600**

A. Safeguarding Procedures

What to do if a child tells you about abuse or if you are concerned about a child's welfare?

- 1.1 The meaning of 'tell' is very broad in this context. It includes a child making a direct disclosure about him or herself or about another child, as well as sharing information that is worrying but not a direct disclosure. It also includes a parent/carer making a disclosure or sharing information that is worrying but is not a direct disclosure.
- 1.2 Sometimes, it is not what a child says, but what s/he does, or does not do, that alerts you. A child may be frightened to talk about what is happening at home. A child may display sudden or strange changes of behaviour, for example angry outbursts or complete withdrawal. A child might become unusually dirty or dishevelled, may lose weight dramatically, or look exhausted. Changes in behaviour or appearance that worry you must be passed on.
- 1.3 **If a child or adult shares information with you, you must**
 - **listen carefully**
 - **let the child lead the pace.** Try not to ask questions. Don't jump in to fill pauses. Keep the conversation going with encouraging nods, attentive eye contact and repetitions of what has been said
 - **reassure the child that telling someone was the right thing to do.** Make sure the child knows that s/he is not alone, and that you are taking what s/he says seriously. You will be getting help from someone who knows what to do in this kind of situation
 - **let the child tell his/her whole story.** Don't investigate, quiz the child or ask them to repeat what they have said but make sure you are clear about what he/she is saying
 - **let the child know what you are going to do next** and who else needs to know about it
 - **be honest.** Answer the child's questions as honestly as you can; if you don't know the answer, say so, but say you will try to find out
 - **don't investigate, don't confront.** Your job will be to pass on the information, not to investigate
 - **ask the child what he/she would like to happen as a result of what he/she has said but make sure that you don't make or imply promises you can't keep.** Never promise total confidentiality if you are told about possible abuse. You will almost certainly have to share the information in order to help keep the child safe. If a child wants to tell, but wants a promise of confidentiality first, tell them that you cannot keep it a secret and that as an 'unsafe secret', if you believe that they or anyone else might be harmed, you will have to tell someone.

Keep a record of your concerns

- 1.4 Once a child discloses something you **must** keep a factual written record of the incident and what you did as a result.

- 1.5 The record should be signed and dated by all staff or volunteers involved and kept confidentially in the **school's file** for that child. The name of the person making the notes should be written alongside each entry including who it has been passed on to and when.

Reporting concerns:

- 1.6 If a child is in need of emergency medical attention or in immediate danger, follow the appropriate procedures of the school or environment you are working or volunteering in. You must ensure you are familiar with, and keep yourself updated with, the procedures in place in the school in which you are working/volunteering.
- 1.7 In other circumstances you should record your concerns and inform the Deputy Designated Lead in your setting as a first priority. You should also ensure you make the charity's Deputy Safeguarding Lead aware of your concerns and the action taken.

What to do if you have concerns about an adult who works with children?

- 1.8 Sometimes, adults deliberately seek work or volunteer positions that will give them ready access to children for abuse. There may be others who would be horrified at the thought of harming a child, but who nonetheless unintentionally put children at risk, or actually harm them.
- 1.9 Ideally, you should be working in an ethos of open and honest comment. So if you are worried about something a colleague/volunteer does, you can talk directly to him/her about it at an early stage – just as s/he would talk to you if your practice was not quite following the charity's policy and guidance when working with children. Then you would only need to refer the concern if the behaviour didn't change. This open and honest relationship between those who work with children protects children but also protects the adult from misunderstandings and false allegations.
- 1.10 The charity has a clear, comprehensive Whistle Blowing Policy to help you protect children from those who might put them at risk. You have a duty to seek advice from the charity's Designated Safeguarding Lead where you observe:
 - a lack of appropriate boundaries e.g. in physical contact
 - personal issues affecting behaviour with children
 - ignorance of, or refusal to accept, health and safety issues
 - an uncontrolled tendency to lash out when angry
 - special attention to a child or group of children that singles them out from the rest of the group
 - attempts to make contact with children outside the school environment
 - flouting of guidelines for behaviour with children
 - possible targeting and grooming of individual children
 - a child's disclosure of abuse or of behaviour that has made the child feel unsafe.
- 1.11 If the charity's Designated Safeguarding Lead is the person about whom you have concerns, contact the CEO. If you are concerned about the behaviour of the CEO, contact the designated trustee for safeguarding.

- 1.12 Reporting the behaviour of a colleague/volunteer can be an uncomfortable situation, particularly if you are unsure about what is happening. You might be worried that you are over-reacting and that you might be wrong. It is useful to consider what could happen if your concerns are well-founded and you fail to act: it is very likely that children will come to harm. So it is better to be safe than sorry. Your role is to pass on concerns, not to investigate their merit. You have no option but to pass on information about behaviour in a colleague/volunteer that worries you.
- 1.13 The Whistle Blowing Policy is designed to protect you during the process of investigation; if your concerns turn out to be mistaken, you should not be made to feel that you were wrong to bring it to anyone's attention. Whistleblowers are protected by the law.

Peer-on-Peer Abuse. What to do if you have concerns about a child who might be harming other children?

- 1.14 It is important to be aware that children can abuse other children. It is therefore important to understand the difference between consenting and abusive, appropriate and exploitative peer relationships. You should not dismiss some abusive sexual behaviour as 'normal' between children, and should not develop high thresholds before taking action. Abuse is abuse and should never be tolerated or passed off as 'banter' or 'part of growing up'
- 1.15 Therefore when another child within or outside the family alleges abuse of a child, the Safeguarding procedures must be followed in respect of both the victim and considered in relation to the alleged abuser.
- 1.16 The needs of children who abuse other children should be considered separately from the needs of their victims, and an assessment should be carried out in each case. They may also be in need of protection. The perpetrator of abuse should therefore also be referred to the charity's DSL .

2. Allegations against staff or volunteers

- 2.1 All members of staff and volunteers receive training on an annual basis regarding safer working practices and have the knowledge of how to avoid situations that place themselves or the children they work with at risk.

Staff

- 2.2 If an allegation is made against a member of staff, the DSL will take appropriate action as soon as it is brought to their attention.
- 2.3 The allegation will be investigated without delay. This will be done in consultation with the school under their procedure and other professionals will be involved if appropriate to the nature of the allegation (see the policy for the school setting). The member of staff will be suspended pending investigation.

- 2.4 After the investigation, if the member of staff is found innocent of the allegation they will be reinstated but additional supervision will be put in place to ensure that for a minimum period of 2 weeks they will be closely monitored by a designated senior member of staff. Thereafter they will continue to be supervised and assessed for a further 3 months during which time they will receive further Safeguarding training.
- 2.5 If the member of staff is found guilty then appropriate action will be taken depending on whether the abuse is deemed a criminal offence or not. This could be dismissal or reassignment to another post.
- 2.6 In relation to an allegation of abuse made against a charity member of staff there are procedures in place to make a referral to the DBS if a person has been dismissed or removed due to safeguarding concerns, or would have been had they not resigned. Failure to refer when these criteria are met is a criminal offence; therefore the charity will always refer.

Volunteers

- 2.7 If an allegation is made against a volunteer, the DSL will take appropriate action as soon as it is brought to their attention. The volunteer will be called into a meeting at the earliest possible time to inform them of the allegation. This will usually be with the DSL and another member of the charity's staff team.
- 2.8 The allegation can only be investigated with cooperation of the school under their procedure. Most schools will not be able to carry out investigations and their policy is to remove the volunteer from the school premises permanently.
- 2.9 If the school does not cooperate in an investigation, the charity will be unable to carry out a proper investigation and the volunteer will be unable to continue in their role as a volunteer in the school for the charity.

3. Working Online with Community Literacy Lab Children

- 3.1 Parents are normally the first point of contact. If a suspicion of abuse is recorded, parents are informed at the same time as the report is made, except where the guidance of the local safeguarding Children Board does not allow this. This will usually be the case where the parent is the likely abuser. In these cases the investigating officers will inform the parents.
- 3.2 We have procedures for contacting the local authority on child protection issues, including maintaining a list of names, addresses and telephone numbers of social workers to ensure that it is easy, in an emergency for the setting and social services to liaise together.