

Pearson Online School Services Safeguarding Policy

29 April 2021

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Policy Statement

Purpose and scope of policy

Pearson puts the learner at the centre of all that we do. We are committed to providing a safe and secure online environment for all our learners, employees, apprentices and stakeholders, particularly those that are under 18 or in some other way vulnerable.

Our primary consideration is to ensure that no learner is at risk of abuse or is harmed. We aim to protect children, young people and vulnerable adults who are engaging with our instruction whether online or face to face with the overarching principles that guide our approach to child protection.

In most instances, Pearson Online School Services ('POSS') will be providing teaching and learning delivered online to learners in a partner's school. As such, POSS staff will work closely with the partner on all matters regarding safeguarding and the welfare of the learners. The links with the partner's Designated Lead for Safeguarding ('DSL') and Deputy Designated Safeguarding Leads ('DDSLs') will be particularly important and this is reflected in this Policy.

Except where stated, it is assumed throughout this policy that the DSL is an employee of the POSS partner school.

Where POSS delivers a substantive amount of the teaching at the school, members of the POSS academic staff may hold the posts of DSL and/ or DDSL. Such assignment of duties will be explicitly confirmed before teaching begins at each partner school, by consultation between the Business Managers of POSS and the partner.

Legal framework and related policies and procedures

POSS's approach to safeguarding, and thus this policy, is based upon, and informed by, recognised best practice in the UK and the UK regulatory framework and statutory guidance regarding safeguarding. As such, the UK Department for Education's statutory guidance, [Keeping Children Safe in Education](#) ('KCSIE'), is at the heart of this policy.

This policy is complementary to several of Pearson's existing policies and practices which are mentioned below. In general, where any reference is made to the physical world in these documents, this will apply in the same way in the online world, or as near to it as is reasonably foreseeable and possible.

- Code of Conduct
- Health and Safety
- Social media guidelines
- Online safety

- Global Information Security
- Recruitment, Selection and Disclosure.

Our beliefs

We aim for all learners to have the same opportunity to use and engage with our materials and therefore all learners should have equality of protection when doing so. This is regardless of their gender, ability, race, sexuality, ethnicity, circumstances or age. Vulnerable children and adults require particular attention in order to optimise their safety needs and promote their access to important opportunities.

Our objective is to do all that we can to ensure that learners are not at risk of abuse while receiving a service from us, whether this is from Pearson employees, peers, contractors or partners. We will recognise and take appropriate action, when a child, young person or vulnerable adult might be abused in the community or family.

How we will help keep children, young people and vulnerable adults safe

This policy defines procedures on the safeguarding standards we expect our employees to follow and the actions that they should take to avoid risk and respond to cases of abuse. These procedures are communicated to our employees, contractors, parents, partners and other interested parties. Appropriate training is carried out to build our people's skills in avoiding, identifying, responding and reporting cases of harm. This activity is monitored by the Pearson Safeguarding Manager. We also document all serious safeguarding concerns, reporting them to the school's DSL and where appropriate to the Pearson Safeguarding Manager, who acts as the DSL for POSS activities, and safeguarding agencies.

Contact details

Designated Safeguarding Lead for Pearson Online School Services	TBC Safeguarding Manager xxx +44 (0) xxx
Deputy Designated Safeguarding Lead for Pearson Online School Services	James Healey Director, Virtual Schools james.healey@pearson.com +44 (0) 7725 600 857
Further escalation	Shaun Kelly Global Director of Safeguarding shaun.kelly@pearson.com +44 (0) 7808 641120

Policy review

We regularly review our Policy to ensure that our commitments remain relevant to the nature of Pearson operations and online practices.

Policy created	April, 2021
Author	James Healey. Director, Virtual Schools.
Next review date	September, 2021

Recognising concerns and reporting

Areas of risk

POSS will provide a safe and secure online environment for all our learners, employees, apprentices, partners and stakeholders, particularly those that are under 18 or in some other way vulnerable.

The three main areas of risk online are context, content and conduct.

Content

- Material that can be damaging to children, young people or vulnerable adults when it is not age appropriate
- Sites may show sexual, violent or, hate material
- Sites may promote harmful behaviour.

Contact

- This is where adults or peers contact children with a view to abusing them
- This is where children, young people, and vulnerable adults are contacted for exploitation and radicalisation.

Conduct

- This relates to children, young people and vulnerable adults' behaviour online
- This may include bullying and sexting
- This may take place inside and outside of the tutoring session.

The following procedures set out POSS's approach if safeguarding concerns occur. The term 'online' in this document refers to someone using a device to gain access to the internet necessary in facilitating teaching and learning. This list of devices is not exhaustive and changes over time.

Recognising abuse

All POSS teachers, tutors or other member of academic staff ('academic staff') whether full time or part time, temporary or permanent, in either a paid or voluntary capacity have a responsibility to identify the symptoms and triggers of abuse and neglect, and to report any concerns they may have about a learner's wellbeing. These symptoms of abuse can be found in the KCSIE report and in the Pearson Safeguarding Policy and are reviewed in induction training and annual safeguarding training. Appendix A sets out some particular types of abuse that POSS academic staff should be aware of; in the UK they fall under the following categories:

PHYSICAL ABUSE

Physical abuse is any form of threatened or actual violence, 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.

EMOTIONAL ABUSE

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's psychological state and emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar 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 participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber-bullying), causing children to frequently 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.

SEXUAL ABUSE

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of 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.

NEGLECT

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 because 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 care-givers); or ensure access to appropriate medical care or treatment. This form of abuse may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Indicators of abuse

It is the responsibility of all POSS academic staff to report any and all niggling worries or concerns over safeguarding and welfare via the partner's safeguarding monitoring and reporting system to the school's DSL. It is not the responsibility of POSS academic staff to investigate or decide whether a child has been abused. A child who is being abused or neglected may:

- be reluctant to turn on their webcam
- have visible bruises, bleeding, burns, fractures or other injuries
- show signs of pain or discomfort
- look unkempt and uncared for
- have difficulty in making or sustaining friendships
- appear fearful
- be reckless with regard to their own or other's safety
- self-harm
- show signs of not wanting to be at home
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn
- challenge authority
- become disinterested in their schoolwork
- be constantly tired or preoccupied
- be involved in, or particularly knowledgeable about drugs or alcohol
- display sexual knowledge or behaviour beyond that normally expected for their age.

POSS academic staff may also see or hear behaviour in the learner's background when teaching online which raises concern. Any concerns about a learner should be reported by POSS academic staff even if there is no conclusive evidence of abuse.

Responding to immediate danger

As a member of the POSS academic staff, if you believe that a learner is in immediate danger or is at risk of harm, you must take appropriate action to address this. This could include contacting the school's DSL and/ or calling the police or emergency services where the learner is resident. Any contact with the parent would be done via the school in question. When reporting any such concern you should ensure that the school, police or emergency service agency gives you feedback on what actions they will take.

After taking initial action, the member of academic staff should immediately contact the school's DSL and then complete a written incident report and submit it via the school's safeguarding monitoring and reporting system. This report must be submitted before the end of the school day during which the initial action was taken.

Responding to crimes

If you believe a crime has been committed, you should report this to the school's DSL, or in their absence to the DDSL, and also report it to Pearson's Safeguarding Manager.

Reporting safeguarding concerns

If you have a safeguarding concern about a learner which is not regarding immediate danger or risk of harm, you should directly contact the school's DSL and then submit a written report detailing your concerns via the school's safeguarding monitoring and reporting system. This report should be submitted as soon as possible, and no later than before the end of the school day for which the concern was first raised or noticed. The report must include:

- The date and time of the incident, or the disclosure of the incident
- The date and time the record is being made
- The name, role and contact details of the person to whom the concern was originally reported
- The name, role and contact details of the person making the report (if this is not the same person as above)
- The name, age and other relevant information about the child, young person, vulnerable adult, who is the subject of the concern
- The names of all parties involved in the incident including any witnesses
- What was said and done and by whom
- Any action taken regarding the matter.

The school's DSL will consider your concerns and also take into account any previously tracked information about the learner. They may contact you for further information to assist with their decision making. They will make the decision as to what action to take and inform you of any necessary follow-up actions or information. The school's DSL will update the report to record what, if any, further action was taken, such as a referral to a statutory agency and, if appropriate, the reasons why the matter was not referred to a statutory agency.

Records will be stored in line with the partner school's child protection records policy.

Asking a learner if they are okay

If you suspect that a learner may be at risk but have no 'real' evidence, where possible you should give the learner an opportunity to talk. It is fine to ask the learner if they are okay, or if you can help in any way. Following an initial conversation with the learner, if you remain concerned, you

should submit a written report detailing your concerns via the school's safeguarding monitoring and reporting system.

If a learner makes a disclosure

It takes courage for a learner to disclose that they are being or have been abused. If a learner talks to you about any risks to their safety or wellbeing, you should:

- allow the pupil to speak freely
- remain calm and avoid overreaction
- offer reassurance and general words of comfort
- not be afraid of pauses or silences
- not ask investigative questions
- explain at an appropriate time that, in order to help, the information must be passed on to relevant people in positions of responsibility
- not reprimand the learner for failing to disclose earlier
- establish the next steps which will be to inform the school's DSL and let the learner know that someone will be in touch with them within 24 hours
- report verbally to the school's DSL, even if the student has promised to do it by themselves
- submit a written report, including a record of the conversation, via the school's safeguarding monitoring and reporting system before the end of the school day
- seek support, if distressed.

Securing evidence

All teaching and mentoring sessions are recorded for up to two years. If an incident or disclosure occurs in a recorded session, the following files should be secured:

- the recording of the session, and
- any written communication related to the incident on the online white board, chat box or elsewhere.

These files should be passed to the school's DSL who will ensure they are copied onto the learner's child protection file, which is separate to their academic record.

CONSTANT VIGILANCE

It is considered best-practice for a school's safeguarding team to spot-check at random at least one live or recorded lesson or session per week per teacher, to be vigilant for child protection and safeguarding concerns.

Escalating concerns

POSS academic staff should normally follow the reporting procedures outlined in this policy. However, they should escalate their concerns if:

- the situation is an emergency and the school's DSL (and DDSL, if such a role exists) is unavailable
- their concern involves the school's DSL, DDSL or Principal
- they have reported their concern to the school's DSL and feel their concern has not been adequately addressed
- they have reported their concern to the Pearson Safeguarding Manager and feel their concern has not been adequately addressed
- they make a judgement that an escalated report is in the best interests of the learner.

POSS academic staff can escalate a concern further by reporting it directly to Pearson's Global Director of Safeguarding.

Confidentiality

POSS recognises that all matters relating to child protection are sensitive and confidential. Information is shared only on a 'need to know, what and when' basis. Concerns about individuals should never be discussed elsewhere, inside or outside the service, unless in confidential meetings for the purpose of safeguarding. This is not only to respect any individuals involved but also to ensure that information released into the public domain does not compromise evidence.

Child protection information will be stored and handled in line with legislation in the partner school's jurisdiction. It is anticipated that the legislation would ensure that information is processed for limited purposes; is adequate, relevant and not excessive; is accurate; kept no longer than necessary; processed in accordance with the data subject's rights; and secure.

If any member of the POSS academic staff receives a request from a learner or parent to see child protection records, they will refer the request to the school's DSL.

Support for children involved

We recognise that children who are abused or witness abuse can find it difficult to develop a sense of self-worth and may feel helplessness, humiliation and a sense of self-blame. Our curriculum, teaching, ethos and policies are designed to provide an environment which will support learners.

Concerns or Allegations Relating To Learners

All POSS academic staff should be alert to the risk of peer-on-peer abuse and understand their role in preventing, identifying and responding to it.

Peer-on-peer abuse may take different forms. In an online setting, the most pertinent are sexual harassment, sexting (also known as youth produced sexual imagery), use of hate language and bullying. There are two likely routes to consider when managing a report of peer-on-peer abuse:

- Likely no risk of significant harm: The member of staff should contact the school's DSL and then submit a report to the school's safeguarding monitoring and reporting system. Incidents where there is no risk of significant harm will be managed internally by the school's DSL.
- Where there are concerns of significant harm: The member of staff shall contact the school's DSL and then submit a report to the school's safeguarding monitoring and reporting system. The school DSL will contact the Pearson Safeguarding Manager and agree the appropriate next steps and actions.

POSS academic staff will cooperate with the school and other agencies to support both the instigator of the bullying and the subject of the bullying.

Young people who abuse others may be victims of abuse themselves, and the child protection procedures will be followed for victims and perpetrators. It is important to ensure that victims and perpetrators are supported and protected, especially from bullying and harassment.

Concerns or allegations relating to members of staff

When an allegation is made against a member of the school's academic staff, or a concern is expressed about their conduct relating to children, set procedures must be followed, regardless of whether the individual is, or was, employed by POSS or the partner school. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events can happen, and a child may make an allegation against an innocent party because they are too afraid to name the real perpetrator.

A member of the POSS academic staff who is concerned about the conduct of another member of staff towards a learner must remember that the welfare of the child is paramount. No member of POSS academic staff will suffer a detriment for raising a genuine concern.

It is vital that expressions of concern that do not necessarily amount to 'allegations' are reported, particularly if there are repeated reports of such concerns and/ or questionable conduct. It may be that the concern expressed has been raised by another party. If there are repeated reports of such concerns and/or questionable conduct, a pattern of unacceptable behaviour may be identified.

POSS accepts that some professionals can pose a serious risk to the learners and will act on every allegation or concern that a person working with, or who is in contact with learners, may have:

- behaved in a way that has harmed a child
- committed a criminal offence against or related to a child
- behaved in a way that calls into question their suitability to work with children.

If the concerns raised do not meet these criteria, POSS will resolve the matter as quickly as possible. A record of the concern will be kept to allow any patterns of unacceptable behaviour to be identified.

The context of the abuse or harm occurring in an online setting is no different to other situations where there are safeguarding concerns for the safety/welfare of a child, young person or vulnerable adult.

CONCERNS OR ALLEGATIONS RELATING TO POSS MEMBERS OF STAFF

- Allegations or concerns against a current or former POSS member of academic staff should be immediately reported directly to the Pearson Safeguarding Manager, who will immediately inform the Pearson Global Director of Safeguarding. The school's DSL and Principal should then also be informed by the Pearson Safeguarding Manager. The Pearson Safeguarding Manager and Global Director of Safeguarding will decide the appropriate next steps and actions, and the Pearson Safeguarding Manager shall inform the school's DSL and Principal of them.
- After raising the allegation or concern, the member of staff reporting it must submit a written report via Pearson's safeguarding monitoring and reporting system, PRISM, before the end of the school day.

CONCERNS OR ALLEGATIONS RELATING TO NON-POSS MEMBERS OF STAFF

- Allegations or concerns against a current or former member of the partner school's academic staff should be immediately reported directly to the school's DSL. The school's DSL should inform the Principal and follow the school's safeguarding policy with regards appropriate next steps and actions. The Pearson Safeguarding Manager must be informed of the next steps and actions that are decided upon by the school.
- After raising the allegation or concern, the member of staff reporting it must submit a written report via (i) the school's safeguarding monitoring and reporting system; and (ii) Pearson's safeguarding monitoring and reporting system, PRISM. Both reports must be submitted before the end of the school day.

REPORTING TO THE POLICE

POSS academic staff may also report any allegations or concerns directly to the local police if they believe direct reporting is necessary to secure action and they feel a crime has been committed.

Concerns or allegations relating to the school's DSL

Allegations or concerns against a school's DSL, whether they are an employee of the partner school or an employee of POSS, should be immediately reported directly to the school's Principal, the Pearson Safeguarding Manager and the Pearson Global Director of Safeguarding. Together, they will decide the appropriate next steps and actions.

After raising the allegation or concern, the member of staff reporting it must submit a written report via Pearson's safeguarding monitoring and reporting system, PRISM, before the end of the school day.

Concerns or allegations relating to the school's Principal

Allegations or concerns against a partner school's Principal, should be immediately reported directly to the Pearson Safeguarding Manager. The Pearson Safeguarding Manager will immediately inform (i) the Pearson Global Director of Safeguarding; (ii) the relevant Business Managers of POSS and the partner school; and (iii) the Chair of Governors of the school, if such a role exists. Together, these parties shall decide the appropriate next steps and actions. The Business Manager of the partner school may decide to include additional personal from their organisation in the discussion.

After raising the allegation or concern, the member of staff reporting it must submit a written report via Pearson's safeguarding monitoring and reporting system, PRISM, before the end of the school day.

In Appendix C, there is a flowchart on the procedures for reporting concerns.

Managing allegations against members of POSS staff

Upon receiving an allegation or concern about a POSS member of staff, the Pearson Safeguarding Manager and Pearson Global Director of Safeguarding will immediately discuss the allegation with the Local Authority Designated Officer ('LADO') for Westminster, London. The purpose of an initial discussion is for the LADO and the Pearson safeguarding personnel to consider the nature, content and context of the allegation and agree a course of action. In the process of this liaison, Pearson and the LADO will:

- share what information is available, both from the source of the allegation and also from Personnel files
- identify what other information might be needed
- consider whether the alleged perpetrator should continue working or remain in contact with learners
- consider whether suspension is appropriate advice on this aspect
- decide what information and/ or advice is to be given to the Pearson Safeguarding Manager, including whether the member of staff should be informed of the allegation at this stage
- decide what action is needed, and who needs to be involved and informed (including the DBS and/ or Teaching Agency).

Decisions about the course of action is taken on a case-by-case basis, bearing in mind the paramount importance of the safety of any child(ren) involved but also remembering that the member of staff, against whom an allegation has been made, has the right to remain anonymous and to expect any allegations to be investigated as expeditiously as possible. Any course of action

is subject to a risk assessment. Decisions would also follow the guidance of the LADO and/ or police.

The following definitions will be used when determining the outcome of allegation investigations:

- Substantiated: there is sufficient evidence to prove the allegation
- Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- False: there is sufficient evidence to disprove the allegation
- Unsubstantiated: there is insufficient evidence to either to prove or disprove the allegation; the term, therefore, does not imply guilt or innocence
- Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

If Social Services and the police decide to take no action, Pearson will still need to consider what further investigation is necessary. If there is a case to answer, a disciplinary hearing will be called, which could lead to dismissal.

Where a criminal investigation has taken place and either (i) a trial has resulted, (ii) the investigation has been closed without charge or (iii) a decision has been taken not to prosecute a case after charge, the Pearson Safeguarding Manager will discuss with the LADO what, if any, further action is required as regards the member of staff concerned and the sharing of information obtained by the agencies involved in assisting any further action to be taken by Pearson.

Where a disciplinary investigation is required, the investigation should be conducted in accordance with Pearson's disciplinary procedure.

Supporting those involved

Every effort will be made to maintain confidentiality and guard against publicity while an allegation is being investigated or considered. Apart from keeping the learner(s), parent(s)/guardian(s) and the person about whom the allegation has been made (in cases when this would not place the learner at further risk) up to date with progress of the case, information should be restricted to those who have a need to know in order to protect children, facilitate enquiries or manage related disciplinary processes.

As an employer, Pearson has a duty of care towards its employees. Pearson provides effective support for anyone facing an allegation and provides staff members with a named contact if they are suspended. Social contact with POSS colleagues will not be prevented, unless there is evidence to suggest that it is likely to be prejudicial to the gathering and presentation of evidence.

Parent(s) or guardian(s) of a learner involved will be told about the allegation if appropriate as soon as possible, if they do not already know of it. They will also be kept informed about the progress of the case and told the outcome where there is not a criminal prosecution. However, if police or other agencies need to be involved, this should not take place unless or until those agencies have been consulted and have agreed what information can be disclosed to the

parent(s)/guardian(s). That includes the outcome of any disciplinary process. The deliberations of a disciplinary hearing, and the information taken into account in reaching a decision, cannot normally be disclosed, but the parent(s)/guardian(s) of the learner will be told the outcome.

Action upon the conclusion of a case

The Pearson Safeguarding Manager will refer to the UK's Disclosure and Barring Service ('DBS') any person who has been removed from working (paid or unpaid) in a regulated teaching activity, or would or might have been removed had they not resigned or left of their own accord, and Pearson believes the person may have harmed, attempted to harm, incited another to harm or put a child at risk of harm or if there is reason to believe the person may have committed one of a number of offences listed under the UK's Safeguarding Vulnerable Groups Act (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009.

'Removal from working' for these purposes will include dismissal, non-renewal of a fixed-term contract, no longer using a supply teacher engaged directly or supplied by an agency, terminating the placement of a trainee or volunteer, no longer using staff employed by a contractor and resignation or voluntary withdrawal from any of the above.

In cases where it is decided on the conclusion of the case that a person who has been suspended can return to work, Pearson will consider how best to facilitate this in collaboration with the partner school. Pearson appreciates that most people would benefit from some help and support when returning to work after a very stressful experience. Depending on the individual's circumstances, a phased return and/or the provision of a mentor to provide assistance and support in the short term may be appropriate. Pearson will also consider how the person's contact with the learner who made the allegation can best be managed if they are still attending the partner school.

If an allegation is determined to be false, the school's DSL may refer the matter to the appropriate Children's Services, or such agency/ body in the country of the learner, to determine whether the learner concerned is in need of services or may have been abused by someone else.

In the event that an allegation is shown to have been deliberately invented or malicious, the Principal will consider whether any disciplinary action is appropriate against the learner who made it, in accordance with the school's rules. This may include permanent exclusion from the school.

A referral will be made to the UK's Teaching Regulation Agency (TRA) where a member of the POSS academic staff has been dismissed (or would have been dismissed had they not resigned) and a prohibition order may be appropriate. The reasons such an order would be considered are 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'.

For POSS academic staff who live outside the UK, Pearson shall seek to communicate with, and follow the procedures in place for making a referral to the relevant in-country teaching regulatory agency or body.

Codes of Conduct

Learner Code of Conduct

POSS would expect that all learners are responsible for their behaviour during online learning. Our expectation is that all learners will participate positively and gain from the experience.

- Learners should ensure a neutral background, if they are accessing live lessons outside a school environment.
- Learners must treat all members of school staff and their peers with respect and fairness.
- Learners must not make any improper suggestions towards any member of staff or peer during their lessons or through their online communications.
- Learners will not send a 'friend' or 'follow' request to any member of school staff via social media. They will refrain from asking any member of staff to disclose their personal information such as their personal address or personal phone number.
- Learners are responsible for the security of their login details to the learning platform and any communication that are sent from it. They must not share their username and password and must not let someone else log into their account assuming their identity.
- If a learner has reason to believe that their login details have been compromised, they must immediately change their password and report the situation to a member of the POSS academic staff or school's DSL.

Learners should always use their computer in a way that shows consideration and respect. It is not acceptable to use obscene, profane, threatening, or disrespectful language in verbal or written communication. These behaviours, including those listed below, will result in sanctions, and where appropriate safeguarding procedures will be initiated:

- Sending or posting discriminatory, harassing, or threatening messages or images
- Stealing, using, or disclosing someone else's login information without explicit authorisation
- Sending or posting confidential material, outside of the school
- Violating copyright law
- Participating in the viewing or exchange of pornography or obscene materials
- Sending or posting messages that defame or slander other individuals
- Using the POSS learning platform for the purposes of promoting radicalisation or any sort of gambling
- Refusing to follow the rules of the specific tutor or tutoring session
- Recording any live lesson or session and transmitting it
- Recording a member of the school's staff and/ or fellow learners
- Not dressing properly for class (for example: dressed in revealing clothes, dressed in clothes with inappropriate logos or words)
- Participation in cyber-bullying and/ or harassment.

POSS academic staff Code of Conduct

- The safeguarding of learners is paramount and takes precedence over all
- Staff must identify a suitable environment for a live lesson or session. They discourage, where possible, learners from joining live lessons or sessions from their bedroom.
- Staff must ensure appropriate clothing for all participants
- Staff should ensure no personal items are visible in the background of their webcam
- Staff must ensure distractions and disturbances around them are minimised
- Staff must be conscious of confidentiality
- Staff must not engage in conduct (including other employment) which could reasonably be expected to damage the reputation and standing of Pearson and/ or POSS
- Staff must complete all relevant safeguarding training provided by Pearson
- Staff must treat all learners and other members of school staff with respect, fairly and without prejudice
- Staff must not make any improper suggestions towards any children, young people and vulnerable adults during their teaching or through their online communications
- Staff must not share their personal contact details with any learner, including their personal mobile number, personal email address and social media accounts. Staff must ensure that all personal social media/ networking sites are set to 'private' and must not accept any 'friend' or 'follow' requests from learners.
- Staff must not share the link to the video conferencing platform with anyone other than the learners involved in the lesson or session
- Staff are responsible for the security of their login details to the platform and any communication that are sent from it. They must not share their username and password and must not let someone else log into their account assuming their identity.
- If any member of staff believes that their login details have been compromised, they must immediately change their password and report the situation to the school's DSL and the Pearson Safeguarding Manager.
- Any instances where a member of staff feels that their actions, or the actions of others, may have compromised POSS, or their own professional standing, should be recorded and reported to school's DSL and the Pearson Safeguarding Manager
- Although this Code of Conduct gives advice and instruction on how to deal with specific situations, it should not replace professional common sense and good judgement. In all matters relating to learner/ school staff relationships, members of staff must bear in mind how an action might reasonably be regarded by a third party.

Accessing, storing and retaining child protection records

Child protection records

Child protection records refer to records relating to concerns about a child's safety and welfare, and/ or concerns about possible risks posed by people working with children, young people and vulnerable adults.

POSS will comply with the partner school's child protection records policy.

Records relating to POSS academic staff

A central record of all allegations and concerns (and connected documents) against members of POSS academic staff will be kept securely by the Pearson Safeguarding Manager, and with access limited to the relevant school DSL, as well as Pearson Human Resources representatives and officers who may be key workers for cases. The only exception to this requirement for permanent recording is where allegations have been found to be malicious. In such cases, all records will be removed from staff personnel files.

The record of allegations against a member of staff may provide clarification in cases where a future Disclosure and Barring Service ('DBS') disclosure reveals information from the police about an allegation that did not result in a criminal conviction. It will also help to prevent unnecessary re-investigation if, as occasionally happens, an allegation re-surfaces after a period. The record will be retained at least until the member of staff involved has reached normal retirement age, or for a period of 10 years from the date of the allegation if that is longer.

An allegation which was proven to be false, unsubstantiated or malicious will not be included in references for staff.

Where there have been concerns about a member of POSS' academic staff and they leave the School to work elsewhere, the Pearson Safeguarding Manager will consider the question of passing the concerns to the new employer or authority.

GDPR and the Data Protection Act 2018

Where POSS has personable identifiable data it will only be kept for as long as is necessary and will be destroyed when no longer relevant, in accordance with the UK's General Data Protection Regulation ('GDPR') and the Data Protection Act 2018.

Safeguarding training and development

POSS considers safeguarding training essential for ensuring that all learners are protected.

Recruiting POSS members of staff

The recruitment process for any member of academic staff will follow the best practice as established in Part three: Safer recruitment of the *KCS/E* statutory guidance. These are reflected in POSS' Recruitment, Selection and Disclosure Policy.

All interview panels will include at least one member who has been trained in Safer Recruitment.

Safeguarding training

Before any member of POSS academic staff is assigned learners and begins teaching, they must complete:

- Pearson safeguarding training, including specific guidance on the safeguarding monitoring and reporting system of the relevant partner school(s).
- Prevent training, which aims to safeguard vulnerable people from being radicalised to supporting terrorism or becoming terrorists themselves.

All member of POSS academic staff will also receive regular, ongoing safeguarding professional development training from Pearson, including:

- Regular emails and other communications updating them on new information, legislation, etc.
- Annual safeguarding update training.

Single Central Register ('SCR')

The Pearson Safeguarding Manager will manage a SCR for all POSS members of staff, to keep a record of their identification, qualification and safeguarding recruitment checks, as well as recording their onboarding and ongoing safeguarding training.

Roles and responsibilities

This section outlines the roles and responsibilities in relation to safeguarding for staff at Pearson and partner schools.

POSS academic staff

All member of POSS academic staff will also receive regular, ongoing safeguarding professional development training from Pearson. They must:

- Provide a safe environment where children can learn
- Be prepared to identify children who may benefit from early help
- Follow the safeguarding procedure when they have a safeguarding concern.

The school's DSL

This person should have the appropriate status and authority within the school to carry out the duties of the post. They should be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters. They will be the first point of contact for POSS staff with regards all matters concerning child protection and safeguarding, including raising concerns. The DSL should:

- Undergo training to provide them with the knowledge and skills required to carry out the role of the DSL. This training should be updated at least every two years.
- Take lead responsibility for safeguarding and child protection, including online safety, for all learners in the school.
- Manage all safeguarding referrals and liaise with all relevant local, national and/ or international agencies.
- Establish a robust monitoring process to ensure vigilance for potential child safeguarding and protection concerns, including a procedure for spot-checking live or recorded lessons.
- Support any member of staff who makes such a referral.
- Act as a point of contact with external safeguarding agencies, this would include but is not limited to Children's Services and the Police.
- Liaise with school staff, the school Principal and the Pearson Safeguarding Manager on all matters relating to safeguarding, and the Business Managers of POSS and the partner, where relevant.
- Ensure that the Principal is made aware of any safeguarding concerns, including ongoing investigations.
- Act as a point of contact and support for school staff.
- Ensure that all staff understand and have access to the school's Child Protection and Safeguarding Policy.

- Ensure the school's Child Protection and Safeguarding policy is reviewed annually, as a minimum, and that the procedures and implementation are updated and reviewed regularly.
- In addition to formal training, the DSL's knowledge and skills should be refreshed (this might be via e-bulletins, meeting other DSLs, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually.
- The DSL, or a DDSL, should always be available during school hours for staff to discuss any safeguarding concerns.

The school's DDSL

A DDSL shall deputise for the DSL if they are absent or unavailable and must be capable of carrying out all the duties and responsibilities of the DSL.

The Principal of the school

The Principal shall:

- Ensure that there is a strong culture of child protection and welfare throughout the school.
- Ensure that all learners are provided with a safe learning environment.
- Ensure that there is a suitable safeguarding monitoring and reporting system in the school.
- Ensure that all members of school staff undergo the relevant safeguarding training at the appropriate time, and that the school's policies and procedures are rigorously followed.
- Ensure that the DSL and DDSLs fulfil their duties in accordance with their roles and responsibilities, and that they feel fully supported in their duties.
- Ensure that all staff at the school have sufficient time and resources to act on their responsibilities.
- Ensure that all staff at the school feel able to raise a concern about any member of the school community, without fear of retribution, retaliation or other negative consequence.
- Liaise with the Pearson Safeguarding Manager and the Business Managers of POSS and the partner with regards safeguarding matters.

The Principal cannot also be the DSL, or DDSL.

The Pearson Safeguarding Manager

The Pearson Safeguarding Manager shall:

- Be the first point of contact at POSS for the school's DSL for any matters relating to safeguarding and child protection and welfare.
- Be the first point of contact for any POSS member of staff who has safeguarding concerns or questions.

- Maintain the Single Central Register ('SCR') for POSS members of staff and take responsibility for the collection, storage and sharing of any safeguarding records relating to POSS academic staff.
- Support any POSS member of staff if an allegation has been raised against them.
- Ensure that the partner school has in place appropriate safeguarding policies, procedures and reporting and monitoring systems.
- Liaise with the Pearson Global Director of Safeguarding in relation to any safeguarding allegations involving the POSS members of staff and agree appropriate next steps and actions.
- Liaise with the Principal of the school and Pearson Global Director of Safeguarding in relation to any safeguarding allegations involving the school's DSL and agree appropriate next steps and actions.
- Liaise with the Business Managers of POSS and the school partner, the Pearson Global Director of Safeguarding, and the Chair of Governors of the school (if such a role exists) in relation to any safeguarding allegations involving the Principal of the school and agree appropriate next steps and actions.
- Be the first point of contact for POSS with local and national child protection agencies or bodies, and teacher agencies or bodies.
- Ensure that POSS faithfully implements its Recruitment, Selection and Disclosure Policy and adheres to Safer Recruitment best practice, for all staff recruitment.
- Ensure that POSS members of staff receive the appropriate safeguarding training during their induction, and also an annual refresher update.
- Keep abreast of safeguarding developments and share new information and guidance or best practice with the school's DSL and POSS members of staff.
- Regularly review, at a minimum once a year, the POSS Safeguarding Policy and the POSS Recruitment, Selection and Disclosure Policy.

Pearson's Global Director of Safeguarding

Pearson's Global Director of Safeguarding shall:

- Provide safeguarding support and insight to POSS Business Managers in relation to new business models.
- Provide support to and oversight of the Pearson Safeguarding Manager.
- Liaise with the Pearson Safeguarding Manager in relation to any safeguarding allegations involving the POSS members of staff and agree appropriate next steps and actions.
- Liaise with the Principal of the school and the Pearson Safeguarding Manager in relation to any safeguarding allegations involving the school's DSL and agree appropriate next steps and actions.
- Liaise with the Business Managers of POSS and the school partner, the Pearson Global Safeguarding Manager and the Chair of Governors of the school (if such a role exists), in relation to any safeguarding allegations involving the Principal of the school and agree appropriate next steps and actions.
- Be the final internal escalation contact for any POSS member of staff.

The Business Managers

The Business Managers of POSS and the partner school shall both:

- Ensure that the child protection and safeguarding roles and responsibilities of POSS and the partner are clearly established before the school begins teaching. And inform the Pearson Safeguarding Manager of key safeguarding contacts.
- Liaise with the Pearson Safeguarding Manager, the Pearson Global Director of Safeguarding and the Chair of Governors of the school (if such a role exists), in relation to any safeguarding allegations involving the Principal of the school and agree appropriate next steps.

Appendix A: Specific Safeguarding issues

POSS academic staff should be aware of the following specific safeguarding issues.

Gang involvement and criminal activity

All members of POSS academic staff should be aware of the indicators which may signal that children are at risk from or are involved with serious violent crime, either through participation in or as victims of gang violence. These may include:

- becoming withdrawn from family
- a change in friendships or relationships with older individuals or groups
- a sudden loss of interest in school – decline in attendance or academic achievement
- using new or unknown slang words
- holding unexplained money or possessions
- staying out unusually late without reason
- a sudden change in appearance, including dressing in a particular style or ‘uniform’
- a new nickname
- signs of assault or unexplained injuries
- increased use of social networking sites
- starting to adopt codes of group behaviour e.g. ways of talking and hand signs
- expressing aggressive or intimidating views towards other groups of young people, some of whom may have been friends in the past
- expressing fear about entering certain areas or being concerned by the presence of unknown youths in their neighbourhood.

All members of staff need to be able to identify the signs and indicators of these and share their concerns immediately with the school's DSL.

Child criminal exploitation

All members of POSS academic staff must be aware that the criminal exploitation of children is a geographically widespread form of harm which:

- can affect any child or young person (male or female) under the age of 18 years
- can affect any vulnerable adult over the age of 18 years
- can still be exploitation even if the activity appears consensual
- can involve force and/ or enticement-based methods of compliance and is often accompanied by violence or threats of violence
- can be perpetrated by individuals or groups, males or females, and young people or adults
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due

to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Guidance about criminal exploitation of children is available in [Criminal Exploitation of Children and Vulnerable Adults](#). This guidance outlines what signs to look for in potential victims, and what to do about it. The document is a supplement to existing safeguarding policies, to help identify and protect those exploited through this criminal activity.

If a member of POSS academic staff develops concerns that a learner is being drawn into criminal exploitation, this should be reported to the school's DSL.

Sexual exploitation of children

Child sexual exploitation is a form of sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage of increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact. It can also occur with technology.

A significant number of children who are victims of exploitation go missing from home, care and education at some point. Some of the following signs may be indicators:

- children who have unexplained gifts or new possessions
- children who associate with other young people involved in exploitation
- children who have older girlfriends or boyfriends
- children who suffer from sexually transmitted infections
- children who suffer from changes in emotional wellbeing
- children who misuse drugs or alcohol
- children who go missing for periods of time or regularly come home late
- children who regularly miss school or education or do not take part in education.

Child sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking. All members of POSS academic staff are made aware of the indicators of sexual exploitation in their safeguarding training and any concerns should be reported immediately to the school's DSL and the Pearson Safeguarding Manager.

Radicalisation

POSS recognises its duty to help prevent young people from being drawn into extremist viewpoints and radicalisation. In the UK, the [Prevent Duty](#) is the duty in the [Counter-Terrorism](#)

and Security Act 2015 of specified authorities, including schools, to have due regard to the need to prevent people from being drawn into terrorism.

There is no single way of identifying an individual who is likely to be susceptible to radicalisation, but there are number of early indicators of radicalisation or extremism, which may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour and peer relationships
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- artwork or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views
- advocating violence towards others.

Members of POSS academic staff who have concerns about a learner will make these concerns known to the school's DSL at the earliest opportunity.

Honour based violence

So-called 'honour based' violence encompasses crimes which have been committed to protect and defend the honour of the family and/ or a community. These crimes should be dealt with as part of existing child safeguarding/ protection structures, policies and procedures. The following practices are illegal in England:

- Female Genital Mutilation: Honour based violence includes the physical act of Female Genital Mutilation (FGM). This is a form of child abuse and a method of violence against women and girls which is internationally recognised as a human rights violation by UNICEF. More information on this can be found on the [UNICEF website here](#). POSS staff are alert to the mandatory reporting requirement for suspected cases of FGM in England, Wales and Northern Ireland.
- Forced Marriage: A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical, emotional and psychological. A lack of free and full consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Forcing a person into a marriage is a crime in the United Kingdom. POSS staff can also contact the Forced Marriage Unit, if they need advice or information: contact +44 (0)20 7008 0151 or email fmufco.gov.uk.

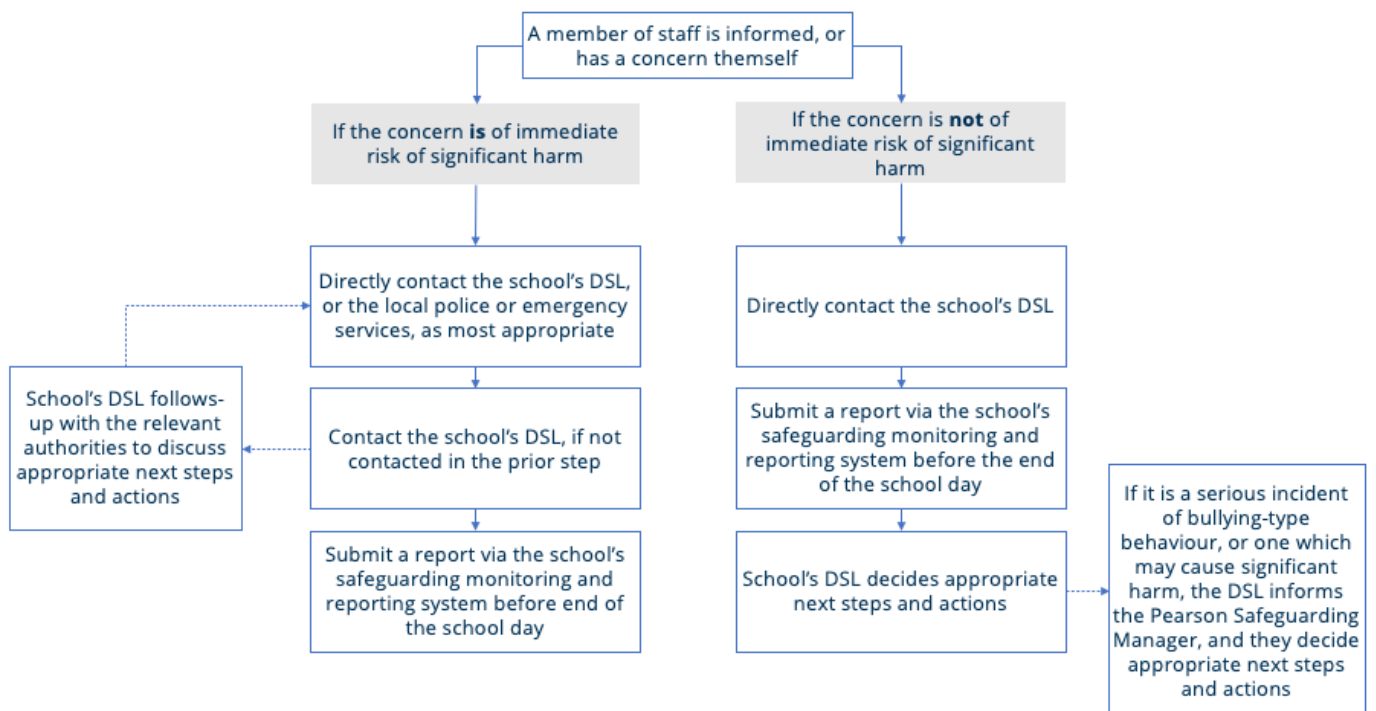
Any concerns about so-called “honour based violence”, should be reported immediately to the school’s DSL.

Appendix B: Missing learners procedure

POSS recognises that a child going missing from education could be a potential indicator of abuse or neglect, including sexual abuse and sexual exploitation. Any concerns that a child/ young person is missing should be reported to the school’s DSL.

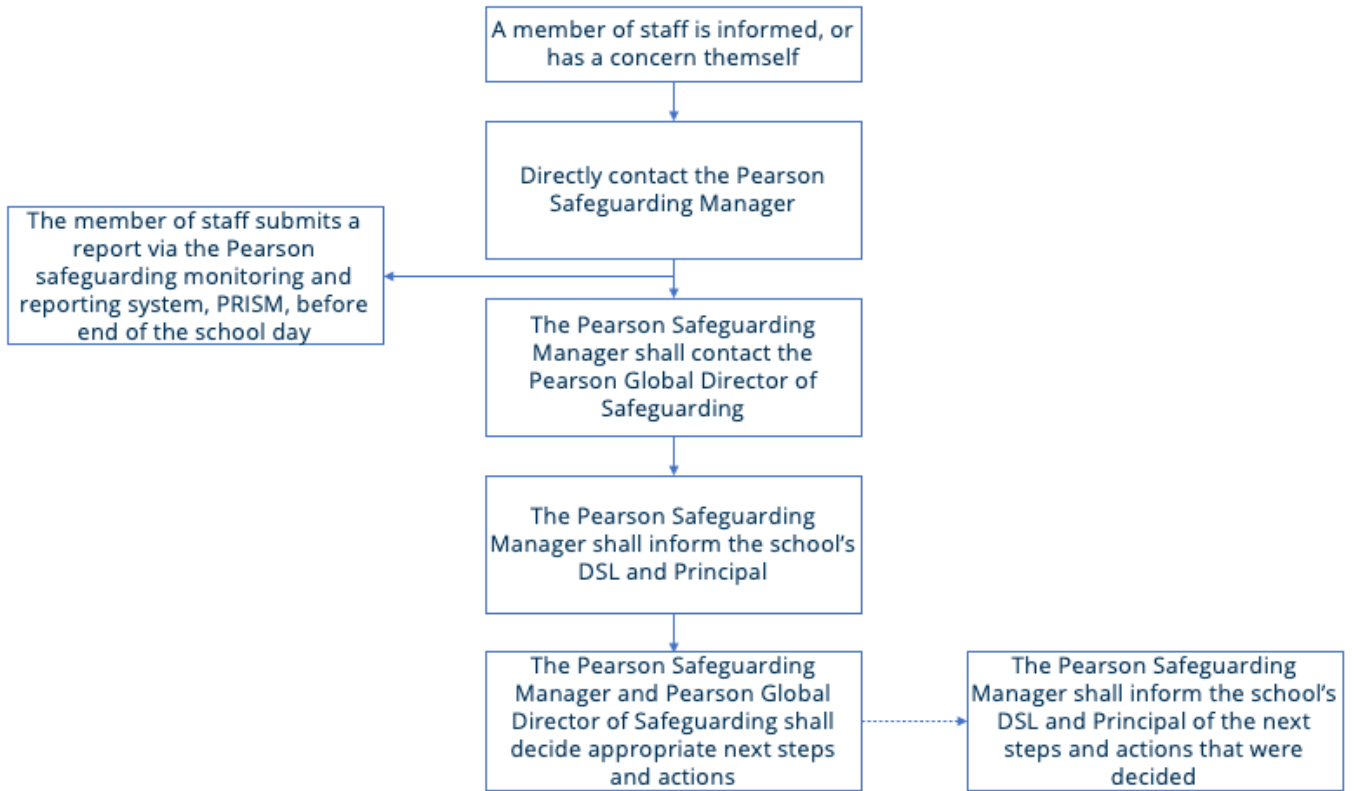
Appendix C: Flowchart for reporting concerns

A child abuse, protection or welfare concern

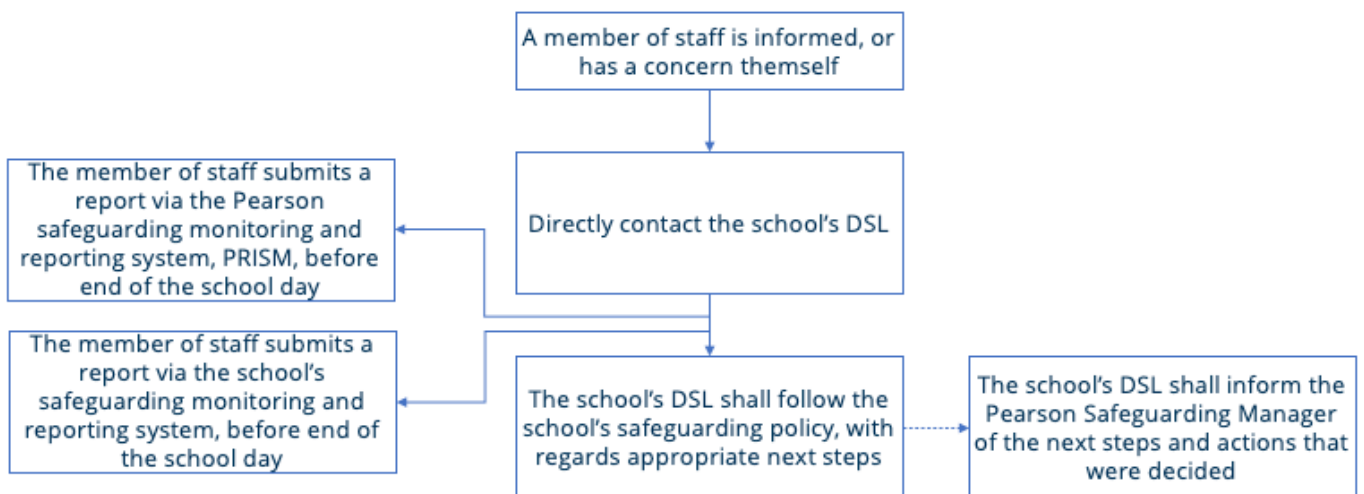


Concerns or allegations relating to school staff

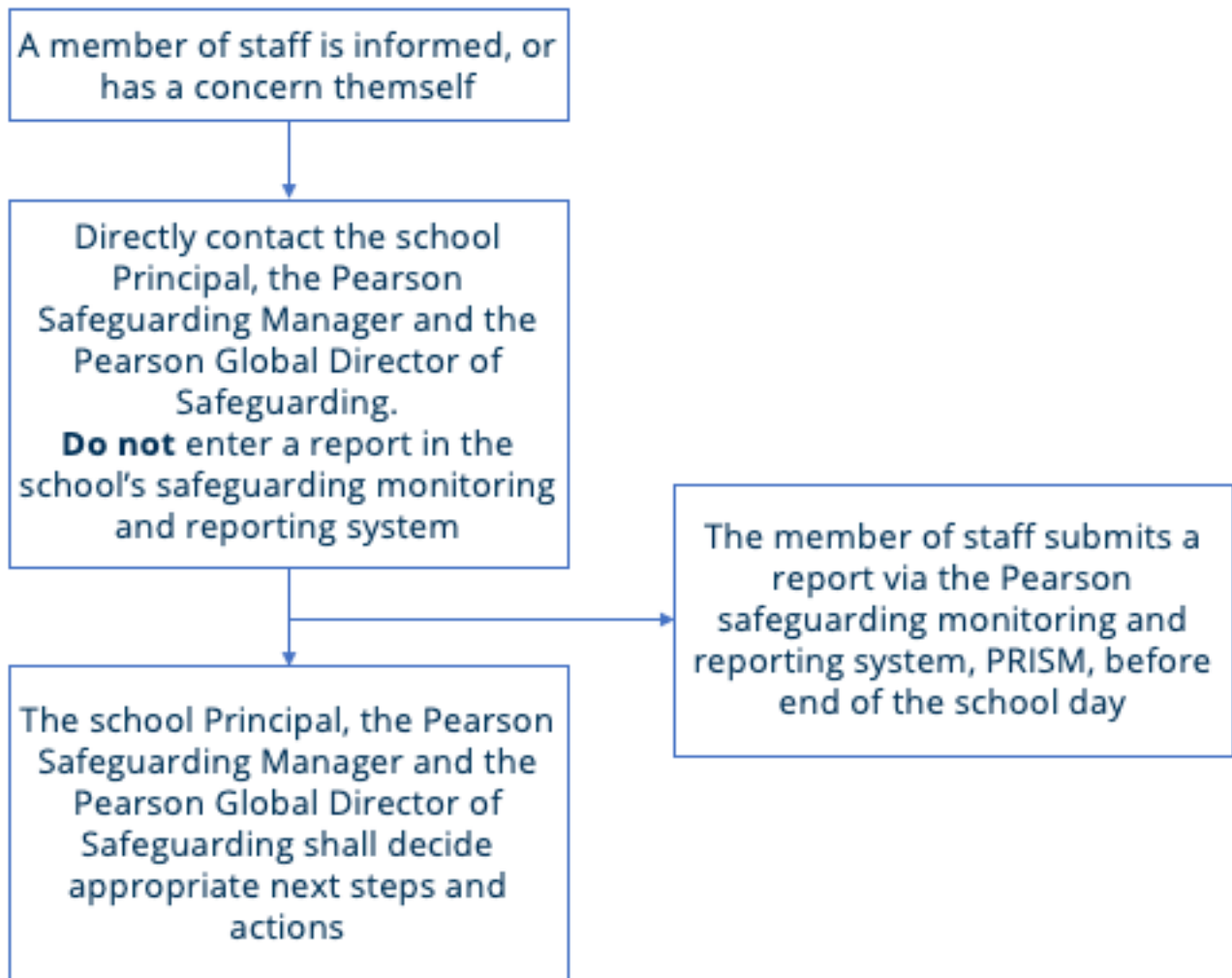
A POSS MEMBER OF STAFF



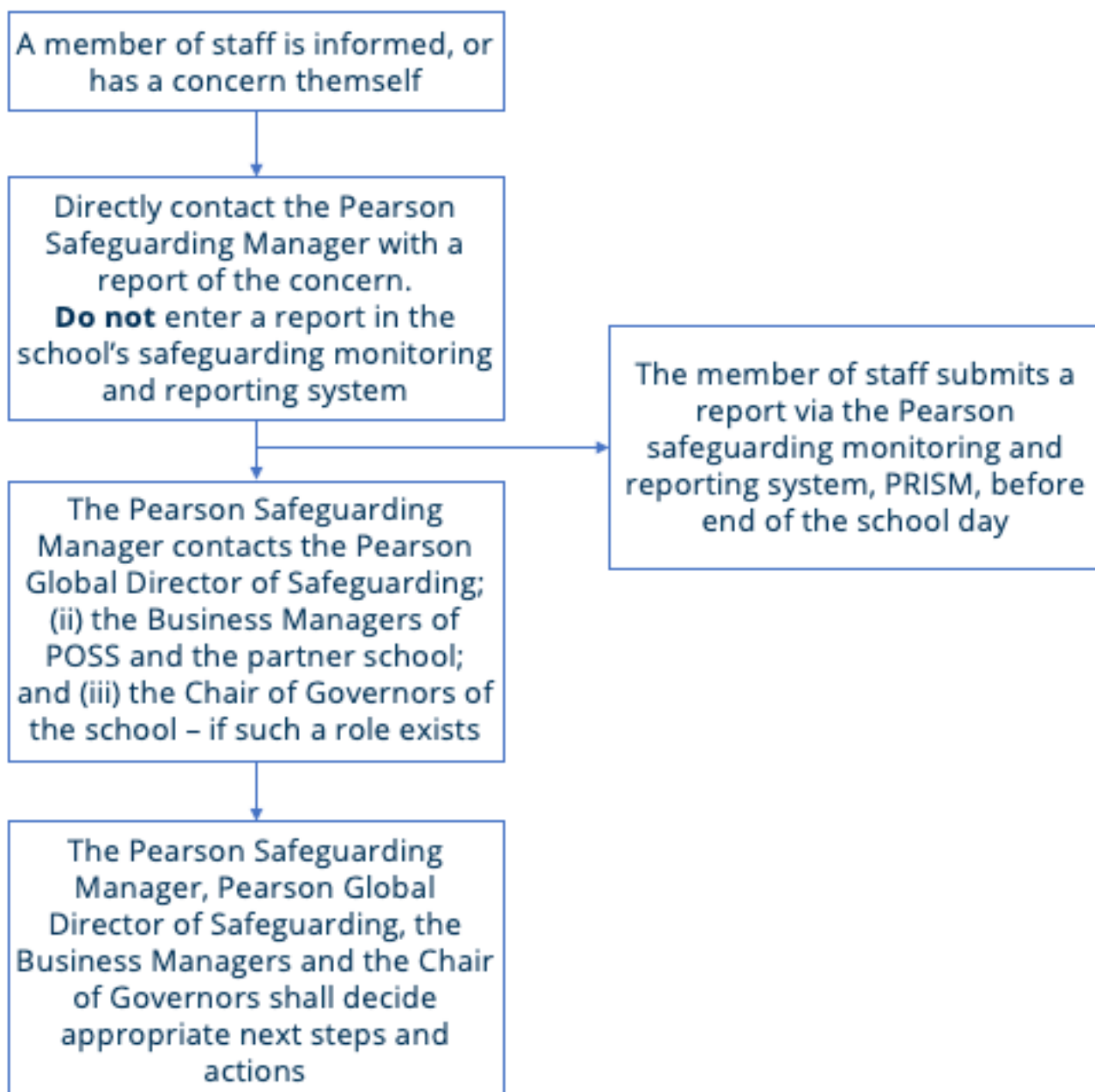
A NON-POSS MEMBER OF STAFF



Concerns or allegations relating to the school's DSL



Concerns or allegations relating to the Principal



Appendix D: Safeguarding criteria for POSS partners

To ensure that all POSS partner schools have a robust Safeguarding Policy, the partner must share the Policy with Pearson. The partner must ensure that the Policy covers the following areas:

- Defines what safeguarding is and what issues it covers
- Contains specific references to online safeguarding
- Contains a clear procedure as to what staff should do if they have a safeguarding concern about a learner, or member of staff
- Contact details for the Designated Safeguarding Lead ('DSL')/ Person
- The recruitment and selection procedure of staff, including background checks. [If these procedures are maintained in a separate policy document, this document must be provided in addition.]
- A clear procedure for safeguarding allegations concerning POSS school staff
- Safeguarding training for staff.

POSS' expectations of a Designated Safeguarding Lead ('DSL')/ Person at the school

This person should have the appropriate status and authority within the school to carry out the duties of the post. They should be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters. They will be the first point of contact for POSS staff with regards all matters concerning child protection and safeguarding, including raising concerns.

It is assumed that the DSL is an employee of the POSS partner school. But where POSS delivers a substantive amount of the teaching at the school, members of the POSS academic staff may hold the posts of DSL and/ or Deputy Designated Safeguarding Lead ('DDSL'). Such assignment of duties will be explicitly confirmed before teaching begins at each partner school, by consultation between the Business Managers of POSS and the partner.

The DSL should:

- Undergo training to provide them with the knowledge and skills required to carry out the role of the DSL. This training should be updated at least every two years.
- Take lead responsibility for safeguarding and child protection, including online safety, for all learners in the school.
- Manage all safeguarding referrals and liaise with all relevant local, national and/ or international agencies.
- Establish a robust monitoring process to ensure vigilance for potential child safeguarding and protection concerns, including a procedure for spot-checking live or recorded lessons.

- Support any member of staff who makes such a referral.
- Act as a point of contact with external safeguarding agencies, this would include but is not limited to Children's Services and the Police.
- Liaise with school staff, the school Principal and the Pearson Safeguarding Manager on all matters relating to safeguarding, and the Business Managers of POSS and the partner, where relevant.
- Ensure that the Principal is made aware of any safeguarding concerns, including ongoing investigations.
- Act as a point of contact and support for school staff.

Ensure that all staff understand and have access to the school's Child Protection and Safeguarding Policy.

- Ensure the school's Child Protection and Safeguarding policy is reviewed annually, as a minimum, and that the procedures and implementation are updated and reviewed regularly.
- In addition to formal training, the DSL's knowledge and skills should be refreshed (this might be via e-bulletins, meeting other DSLs, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually.
- The DSL, or a DDSL, should always be available during school hours for staff to discuss any safeguarding concerns.