



Pearson

Pearson Tutoring

Programme:

Safeguarding Policy

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Policy Statement

Purpose and scope of policy statement

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 sessions whether online or face to face with the overarching principles that guide our approach to child protection.

The Pearson Tutoring Programme will usually be delivered via a school. As such we will work closely with the school on all matters regarding Safeguarding and the welfare of the students. The links with the school's Designated Lead for Safeguarding will be particularly important and this is reflected in the document below.

Legal framework and related policies and procedures

This policy is complementary to several existing organisational policies and practices 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 policy & procedure
- Specific practices for online tutoring

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 online or in schools/colleges, whether this is from Pearson employees, peers or contractors. We will recognize 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 and other interested parties and are published on our corporate website. Appropriate training is also carried out to build our people's skills in avoiding, identifying, responding and reporting cases of harm. This activity is monitored by a Designated Safeguarding Lead. We also document all serious safeguarding concerns, reporting them to the Designated Safeguarding Lead and where appropriate to safeguarding agencies.

Contact details

Designated Safeguarding Lead:

James Healey
Director, Strategic Initiatives
James.healey@pearson.com
Tel: 07725 600 857

Designated Deputy Safeguarding Lead:

Heather Rhodes
Principal of Harrow School Online
Heather.rhodes@pearson.com

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Issue date: 11/09/2020

Review date: 30/06/2021

Owner: Shaun Kelly

Tel: 07775979391

Further escalation:

Shaun Kelly
Global Director of Safeguarding
shaun.kelly@pearson.com
Tel: 07808641120

NSPCC Helpline:

0808 800 5000

Childline:

0800 1111

Dates

We review our Policy at least every year to ensure that are commitments remain relevant to the nature of Pearson operations and online practices.

Signature



shaun kelly (Dec 11, 2020 08:39 GMT)

Shaun Kelly

Procedure document

Areas of risk

We will provide 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. Most contact with learners will be online; however, on occasions where tutors meet with learners in a school, schools will take reasonable safeguarding measures to provide a secure environment for learners. The tutor will also ensure that they comply with the school's guidance on COVID-19 and social distancing at all times when in a school.

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 isn't 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 what will be done 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 a tutoring session. This list of devices is not exhaustive and changes over time.

Recognising abuse

All Pearson Tutoring Programme tutors have a responsibility to identify the symptoms and triggers of abuse and neglect, and to report any concerns they may have about a pupil's wellbeing. These symptoms of abuse can be found in Keeping Children Safe in Education

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Review date: 30/06/2021

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(KCSIE) 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 Pearson Tutoring Programme tutors 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

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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 Pearson Tutoring Programme tutors to report any and all niggling worries or concerns over safeguarding and welfare to the Designated Safeguarding Lead (Pearson Tutoring Programme). It is not the responsibility of Pearson Tutoring Programme tutors 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

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Review date: 30/06/2021

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A Pearson Tutoring Programme tutor may also see or hear behaviour in the pupil's background when tutoring online which raises concern. Any concerns about a pupil should be reported by Pearson Tutoring Programme tutors even if there is no conclusive evidence of abuse.

Responding to immediate danger

As a Pearson Tutoring Programme tutor, if you believe a pupil is in immediate danger or is at risk of harm, you must take appropriate action to address this. This could include contacting the pupil's school and/or calling the police or emergency services where the pupil 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, parent, police or emergency service agency gives you feedback on what actions they will take.

After taking initial action, Pearson Tutoring Programme tutors should speak to the Designated Safeguarding Lead (DSL Pearson Tutoring Programme) or in their absence to the Deputy Designated Safeguarding Lead (DDSL Pearson Tutoring Programme). A written incident report should be completed and submitted to the DSL. Any verbal contact with the parent or criminal justice agency should be followed up in writing within 24 hours; the DSL (Pearson Tutoring Programme) or DDSL (Pearson Tutoring Programme) will liaise with you on this.

The DSL (Pearson Tutoring Programme) or DDSL (Pearson Tutoring Programme) will report the concern and actions to the Designated Safeguarding Lead at the student's school.

Responding to crimes

If you believe a crime has been committed, you should report this to the DSL (Pearson Tutoring Programme) or in their absence to the DDSL (Pearson Tutoring Programme) who will report the Designated Safeguarding Lead at the student's school.

Reporting safeguarding concerns

If you have a Safeguarding concern about a student, you should speak to the DSL (Pearson Tutoring Programme) or in their absence to the DDSL (Pearson Tutoring Programme). You will be asked to complete a written incident report detailing your concerns. The DSL (Pearson Tutoring Programme) will consider your concerns and also take into account any previously tracked information about the pupil.

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They will make the decision to refer to the Designated Safeguarding Lead at the student's school who will then make the decision as to what action to take. The DSL (Pearson Tutoring Programme) should ensure that the Designated Safeguarding Lead at the student's school shares all the necessary information needed to address the concerns.

This conversation should be followed up in writing within 24 hours of the incident, or concern arising.

Asking a pupil if they are okay

If you suspect that a pupil may be at risk but have no 'real' evidence, where possible you should give the pupil an opportunity to talk. It is fine to ask the pupil if he or she is okay, or if you can help in any way. Following an initial conversation with the pupil, if you remain concerned, you should discuss your concerns with the DSL (Pearson Tutoring Programme).

If a pupil makes a disclosure

It takes courage for a pupil to disclose that he or she is being or has been abused. If a pupil 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 pupil for failing to disclose earlier
- establish next steps (agree to talk with the DSL) and let the pupil know that someone will be in touch with them within 24 hours
- report verbally to the DSL (Pearson Tutoring Programme), even if the pupil has promised to do it by themselves
- write up an incident report including a record of the conversation as soon as possible and submit it to the DSL (Pearson Tutoring Programme)
- seek support, if distressed

Securing evidence

Tutoring sessions and tutoring meetings which take place online at Pearson Tutoring Programme are recorded. If an incident or disclosure occurs in a recorded tutoring session or tutoring meeting, the following files should be secured:

- the recording of the tutoring sessions or tutoring meeting
- any written communication related to the incident on the white board or elsewhere

These files should be passed to the DSL (Pearson Tutoring Programme) who will ensure they are copied onto the pupil's child protection file, which is separate to their academic record.

Escalating concerns

Pearson Tutoring Programme tutors should normally follow the reporting procedures outlined in this policy. However, they should escalate their concerns if:

- the situation is an emergency and the DSL (Pearson Tutoring Programme), DDSL (Pearson Tutoring Programme) are unavailable
- their concern involves the DSL (Pearson Tutoring Programme), DDSL (Pearson Tutoring Programme)
- they have reported their concern to the DSL (Pearson Tutoring Programme) or DDSL (Pearson Tutoring Programme) and feel their concern has not been adequately addressed
- they make a judgement that an escalated report is in the best interests of the student

Pearson Tutoring Programme tutors can escalate a concern by reporting their concern directly to Pearson's Global Director of Safeguarding. If after escalation they remain concerned, they should report their concern via one of the following means:

- reporting to Children's Services or an equivalent organisation local to the Local Authority or region in which the child is resident
- reporting to the NSPCC

Reporting to the Educational Endowment Foundation

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The Pearson Tutoring Programme is required to report safeguarding incidents or suspected incidents to the EEF. This includes regular reporting and urgent notification. This reporting will be undertaken by the Designated Safeguarding Lead for the Pearson Tutoring Programme.

Regular reporting

The Designated Safeguarding Lead for the Pearson Tutoring Programme will submit a termly anonymised log of reported safeguarding incidents, concerns or allegations in every term where safeguarding concerns have been raised for the duration of the grant. This safeguarding log contains the following headings:

- reference number;
- date of incidents;
- category of abuse;
- short narrative of what took place;
- name or initials of the person (tutor/teacher/parent/child) reporting the concern;
- action taken;
- any referrals made to outside agencies such as LADO, police, social services;
- outcomes;
- case open or closed.

It is the tuition partner's responsibility to ensure personal data is protected in these reports.

The Designated Safeguarding Lead will submit the safeguarding log to safeguarding@nationaltutoring.org.uk on the dates below:

- 1) 15 January 2021
- 2) 16 April 2021
- 3) 16 July 2021

Serious Safeguarding risks

The Designated Safeguarding Lead for the Pearson Tutoring Programme will submit a report to EEF if a serious safeguarding risk occurs. This will usually be if any of the following takes place:

- incidents of abuse or mistreatment (alleged or actual) of beneficiaries of the NTP (children) which have resulted in or risk significant harm to them and:

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- this happened while they were attending or in contact with any Pearson member of staff or the tutors on the Pearson Tutoring Programme; or
- someone connected with your organisation, for example a trustee, director, staff member, tutor or volunteer, was responsible for the abuse or mistreatment (alleged or actual);
- other incidents of abuse or mistreatment (alleged or actual) of people who come into contact with Pearson through its work, which have resulted in or risk significant harm to them and are connected to the NTP;
- breaches of procedures or policies within the organisation which have put people who come into contact with it through its work at significant risk of harm, including failure to carry out relevant vetting checks which would have identified that a person is disqualified in law from holding their position within the charity. This might be, for example, because they are disqualified under safeguarding legislation from working with children.

When to report

The Designated Safeguarding Lead for the Pearson Tutoring Programme will report an actual or alleged incident to the EEF promptly. This means as soon as is reasonably possible after it happens, or immediately after the organisation becomes aware of it.

What to report

- Protecting children and young people and safeguarding incidents – incidents that have resulted in or risk significant harm to beneficiaries and other people who come into contact with Pearson through its work under the Pearson Tutoring Programme
- Allegations of a breach of trust against a staff member or tutor
- Cyber crime
- Links to terrorism and extremism
- Breaches of Code of Conducts
- The organisation is subject to an investigation by a regulatory body e.g. Ofsted
- Data breaches or data loss that may lead to a safeguarding risk
- Any other type of incident that appears serious and could put someone or damage the reputation of the NTP

This will include serious safeguarding concerns being raised about a member of staff or tutor or where an allegation is made about their conduct. If a serious incident takes place, it is the Pearson Tutoring Programme's obligation to report it immediately to EEF's NTP Designated Safeguarding Officer, Emma Price: emma.price@nationaltutoring.org.uk copying safeguarding@nationaltutoring.org.uk.

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Confidentiality

The Pearson's Tutoring Programme 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 the Data Protection Act 2018 principles. Information is processed for limited purposes; is adequate, relevant and not excessive. It is accurate; kept no longer than necessary; processed in accordance with the data subject's rights; and secure.

Child protection records will be stored securely online in a partitioned limited access area of the network and only made available to relevant individuals. Child protection records are normally exempt from the disclosure provisions of the Data Protection Act. This means that pupils and parents do not have an automatic right to see them. If any Pearson Tutoring Programme tutor receives a request from a pupil or parent to see child protection records, they will refer the request to the DSL (Pearson Tutoring Programme) or the DDSL (Pearson Tutoring Programme) who will be guided by advice from the Data Privacy Officer.

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, ethos and policies are designed to provide an environment which will support pupils.

Concerns or allegations relating to pupils

All Pearson Tutoring Programme tutors 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:

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- **Managing Internally:** Incidents where there is no risk of significant harm will normally be managed internally using the Code of Conduct. If the bullying-type behaviour is particularly serious, or the Code of Conduct is deemed ineffective, the DSL (Pearson Tutoring Programme) will discuss with the Designated Safeguarding Lead at the student's school as to the appropriate response.
- **Where there are concerns of significant harm:** Where the bullying causes or is likely to cause significant harm, the DSL (Pearson Tutoring Programme) will refer to the Designated Safeguarding Lead at the student's school. The Pearson Tutoring Programme will cooperate with the school and other agencies to support both the instigator of the bullying and the subject of the bullying.

Any incident involving youth-produced sexual imagery should be reported to the DSL (Pearson Tutoring Programme) immediately, who will refer to the Designated Safeguarding Lead at the student's school.

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 tutors

When an allegation is made against a Pearson Tutoring Programme tutor, or a concern is expressed about their conduct relating to children, set procedures must be followed. 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 Pearson Tutoring Programme tutor who is concerned about the conduct of another tutor towards a pupil must remember that the welfare of the child is paramount. No tutor will suffer a detriment for raising a genuine concern.

- Allegations or concerns against Pearson Tutoring Programme tutors or the DSL (Pearson Tutoring Programme) or the DDSL (Pearson Tutoring Programme) should be reported directly to the Global Director of Safeguarding
- Pearson Tutoring Programme tutors may also report any allegations or concerns directly to the police if they believe direct reporting is necessary to secure action and they feel a crime has been committed
- Pearson Tutoring Programme tutors may alternatively use the NSPCC whistleblowing helpline number, 0800 028 0285 if they feel that conduct may not have passed the

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threshold for a criminal offence but raises concerns which are not being addressed within the internal reporting mechanisms

- Allegations against a former tutor no longer working at the Pearson Tutoring Programme should be referred to the police

Reports can be made verbally but should be supported by a dated and timed note of what has been disclosed, noticed, said or done.

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.

The Pearson Tutoring Programme accepts that some professionals can pose a serious risk to the pupils and will act on every allegation or concern that a person working with, or who is in contact with pupils, 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, the Pearson Tutoring Programme will resolve the matter as quickly as possible, and where more appropriate, may use the Complaints Procedure instead. 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.

Codes of conduct

Student code of conduct

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Review date: 30/06/2021

Owner: Shaun Kelly

The Pearson Tutoring Programme would expect that all students are responsible for their behaviour during online learning. Our expectation is that all students will participate positively and gain from the experience.

- Students should ensure a neutral background, if they are accessing the tutoring session outside the school environment.
- Learners must treat tutors and their peers with respect and fairness.
- Learners must not make any improper suggestions towards any tutor or peer during their sessions or through their online communications.
- Learners will not send a 'friend' or 'follow' request to their tutors via social media. They will refrain from asking tutors 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 platform and any communication that are sent from this address. They must not share their username and password and must not let someone else log into their account assuming their identity.
- If learners feel their login details have been compromised, they must immediately change their password and report the situation to their teacher if this is within their school or to their parent/carer if this occurs outside of their school with the relevant details.

Students should always use a computer in a way that shows consideration and respect. It is not acceptable to use obscene, profane, threatening, or disrespectful language.

These behaviours 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 code or password without authorization
- Sending or posting confidential material, outside 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 Bramble 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 tutoring session and transmitting it
- Recording the tutor and/or fellow students
- Not dressing properly for class (examples: dressed in revealing clothes, dressed in clothes with inappropriate sayings)
- Participation in Cyber bullying and/or Harassment

Tutor code of conduct

- The safeguarding of pupils is paramount and takes precedence over all

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- Tutors must identify a suitable environment for the call. They discourage, where possible, pupils from making video calls from their bedroom
- Tutors must ensure appropriate clothing for all participants
- Tutors should ensure no personal items visible in the background
- Tutors must ensure distractions and disturbances are minimised
- Tutors must be conscious of confidentiality when working online
- Tutors must not engage in conduct (including other employment) which could reasonably be expected to damage the reputation and standing of the Pearson Tutoring Programme
- Tutors must complete all relevant safeguarding training provided by Pearson Tutoring Programme
- Tutors must treat all learners fairly and without prejudice. Tutors must treat learners and other tutors with respect
- Tutors must not make any improper suggestions towards any children, young people and vulnerable adults during their sessions or through their online communications
- Tutors must not share their personal contact details with learners including their personal mobile number, personal email address, social media accounts. Tutors should therefore not accept any 'friend' or 'follow' requests from learners on their social media accounts
- Tutors must not share the link to the video conferencing platform with anyone other than the learners involved in the session
- Tutors are responsible for the security of their login details to the platform and any communication that are sent from this address. They must not share their username and password and must not let someone else log into their account assuming their identity
- If tutors feel their login details have been compromised, they must immediately change their password and report the situation to the Designated Safeguarding Lead with the relevant details
- Any instances where tutors feel their actions, or the actions of others may have compromised the Pearson Tutoring Programme, or their own professional standing should be recorded and reported to Pearson Tutoring Programme
- 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 pupil/tutor relationships, tutors 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 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.

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These documents will be stored separately from a child, young person and vulnerable adults' general documents by the school and will be up to date and relevant to the purpose for which they are held. These will only be kept for as long as is necessary and will be destroyed when they are no longer relevant.

The files will only be accessed by those involved in safeguarding procedures within the Pearson Tutoring Programme and relevant school. They will be made available to safeguarding agencies/the Police and to Pearson's Designated Safeguarding Lead if necessary.

When a safeguarding incident occurs, records need to be made as soon as possible by the tutor and must include:

- The date and time of the incident/disclosure of incident
- The date and time the record is being made
- The name, role and contact details of the person the concern was originally report to
- 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 to investigate the matter and any further action taken (such as referrals)
- The reasons why the matter was not referred to statutory agencies

These will be stored in the same manner as other child protection records as mentioned above.

Safeguarding training and development

Pearson Tutoring Programme considers Safeguarding and Prevent training as essential for ensuring all learners are protected. As such:

All Pearson Tutoring Programme tutors will receive:

- Safeguarding training in their induction (this will include the use of the functionality of the Bramble platform, and specific online Safeguarding practices)
- Prevent training
- Regular emails and other communications updating them on new information, legislation etc
- Yearly Safeguarding update training

Pearson Tutoring Programme Designated Safeguarding Leads will receive:

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Review date: 30/06/2021

Owner: Shaun Kelly

- Specialist Designated Safeguarding Lead training
- Yearly Safeguarding update training for Designated Safeguarding Leads

Interview panels:

- All interview panels will contain at least one member who has been trained in Safer Recruitment

Organisational structure and governance

The staff at Pearson Tutoring Programme have the following roles and responsibilities in relation to Safeguarding:

All Pearson Tutoring Programme tutors should:

- 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

Designated Safeguarding Lead (Pearson Tutoring Programme) and their deputies should:

- Take the lead for Safeguarding (including online)
- Make the necessary links and referrals to other agencies and professionals
- Support and advise other staff in the Pearson Tutoring Programme in relation to Safeguarding
- Raise awareness of Safeguarding with other Pearson Tutoring Programme staff
- Encourage a culture of listening to learners and taking account of their wishes and feelings in any measure that Pearson Tutoring Programme puts in place to protect learners
- Be available during the operating hours of Pearson Tutoring Programme for staff to discuss their Safeguarding concerns.

The Programme Lead for the Pearson Tutoring Programme should:

- Ensure that the Safeguarding and other relevant policies are updated at least yearly
- Ensure that all tutors and DSLs and their deputies have undertaken appropriate training
- Have an overview of any Safeguarding incidents and ensure that any relevant learning from these are incorporated into the practice of the Pearson Tutoring Programme
- Ensure that all tutors are recruited in line with the Pearson Tutoring Programmes recruitment policy and that all relevant checks are carried out
- Ensure that Safeguarding is part of any contract with a third-party provider, where this third-party provider's service may impact on the safety or welfare of learners

In addition to the above, all Pearson Tutoring Programme staff can consult with Pearson's Global Director of Safeguarding, regarding any issue of Safeguarding.

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Review date: 30/06/2021

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Appendix A: Specific Safeguarding issues

Pearson Tutoring Programme tutors should be aware of the following specific safeguarding issues.

Gang involvement and criminal activity

Tutors 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

Tutors need to be able to identify the signs and indicators of these and share their concerns immediately with the DSL (Pearson Tutoring Programme) who will refer to the Designated Safeguarding Lead at the student's school.

Child criminal exploitation

Pearson Tutoring Programme tutors are 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

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- 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 Pearson Tutoring Programme tutor develops concerns that a pupil is being drawn into criminal exploitation, this should be reported to the DSL (Pearson Tutoring Programme) who will refer to the Designated Safeguarding Lead at the student's school.

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 Pearson Tutoring Programme tutors are made aware of the indicators of sexual exploitation in their safeguarding training and any concerns should be reported immediately to the DSL (Pearson Tutoring Programme) who will refer them to the Designated Safeguarding Lead at the student's school.

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Radicalisation

Pearson Tutoring Programme 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.

Pearson Tutoring Programme tutors who have concerns about a pupil will make these concerns known to the DSL (Pearson Tutoring Programme) at the earliest opportunity, who will refer them to the Designated Safeguarding Lead at the student's school.

The Pearson Tutoring Programme will work more generally to ensure the fundamental British values of democracy, rule of law, mutual respect and tolerance are celebrated and not undermined. Non-emergency advice for Pearson Tutoring Programme staff is available via the DfE's helpline +44 (0)20 7340 7264 and by email at counter-extremism@education.gsi.gov.uk.

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 recognized as a human rights violation by UNICEF. More information on this can be found on the [UNICEF website here](#). Pearson

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Tutoring Programme 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. Pearson Tutoring Programme staff can also contact the Forced Marriage Unit, if they need advice or information: contact +44 (0)20 7008 0151 or email fmu@fco.gov.uk.

Any concerns about so-called “honour based violence”, should be reported immediately to the DSL (Pearson Tutoring Programme) who will refer to the Designated Safeguarding Lead at the student’s school.

Private fostering

Private fostering is when a parent makes arrangements for their child (who is under 16, or under 18 if they are disabled) to live with someone who isn’t an aunt/uncle, grandparent, brother/sister or step-parent, for longer than 28 days. The person who has been asked to look after the child is known as a private foster carer. The DSL (Pearson Tutoring Programme) should be made aware of any concerns immediately, they will then refer to the Designated Safeguarding Lead at the student’s school. This person has a legal duty to tell the relevant Local Authority if they become aware of any private fostering arrangement in the UK or if it suspects that a child is subject to a private fostering arrangement in the UK. The Local Authority is then able to check that the child is safe and being well looked after and that the accommodation and care being given is satisfactory.

Looked after children

A looked after child is a child who is looked after by a local authority, subject to a care order or who is voluntarily accommodated by a local authority, commonly as a result of abuse or neglect. All Pearson Tutoring Programme tutors should understand how to keep a looked after child safe. If a Pearson Tutoring Programme tutor is given responsibility for a looked after child, they will be provided with the information they need in relation to the child’s legal status, care arrangements and the level of authority delegated to the cases by the local authority looking after him. The DSL at the student’s school takes the lead on all looked after children and will hold details of and liaise with the child’s social worker.

Appendix B: Missing pupils procedure

The Pearson Tutoring Programme 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 DSL (Pearson Tutoring Programme) who will refer to the DSL as the student's school.