



Tuition
extra

Safeguarding Policy

Tuition Extra Safeguarding Statement:

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

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1. OBJECTIVE

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

This policy establishes a framework to support all those who come into contact with Tuition Extra, protect them from abuse and maltreatment of any kind and clarifies the organisation's expectations.

We will apply robust risk management processes for the identification of situations which may require the organisation to make professional judgements to protect students from harm.

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

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

It is the responsibility of all directors, staff and tutors to read this policy and supporting procedures and know what to do in the event of a safeguarding concern.

2. WHO IS THIS POLICY FOR?

- Tutors, Schools, Parents, Students, and Tuition Extra staff.

3. DEFINITIONS OF ABUSE

Children are considered to be abused or at risk of abuse by parents/carers when the basic needs of the child are not being met through acts of either commission or omission. Children includes everyone under the age of 18 (KCSIE, 2022).

Knowing what to look for is vital to the early identification of abuse and neglect. All staff will be aware of indicators of abuse and neglect through their experience and training so that they are able to identify cases of children who may be in need of help or protection. If staff are unsure, they should always speak to the designated safeguarding lead (or deputy).

All staff are aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their own experiences as harmful (KCSIE 2022).

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

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

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

(Keeping Children Safe in Education (KCSIE), DfE, September 2022)

3.1 Abuse

Is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children (KCSIE, 2022, para 26).

3.2 Types of abuse and neglect

3.2.1 Physical abuse

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

3.2.2 Emotional abuse

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only 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 cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

3.2.3 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 (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as child on child abuse) in education and all staff and tutors should be aware of it and adhere to this policy and procedures in dealing with it.

3.2.4 Neglect

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 as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

3.2.5 Child on Child Abuse

Children can abuse other children (often referred to as peer-on-peer abuse) and it can take many forms. It can happen both inside and outside of school/college and

online. It is important that all staff recognise the indicators and signs of peer-on-peer abuse and know how to identify it and respond to reports. This can include (but is not limited to): bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse within intimate partner relationships; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence and sexual harassment; consensual and non-consensual sharing of nude and semi-nude images and/or videos; causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party; upskirting and initiation/hazing type violence and rituals.

Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. It is crucial that all staff understand that even if there are no reports in Tuition Extra or the schools and colleges we support, it does not mean it isn't happening (KCSIE 2022, pg 137)

3.2.6 Sexual Violence and Sexual Harassment between children

Sexual violence and sexual harassment can occur between two or more children of any age and sex, from primary through to secondary stage and into college. It can occur also through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face-to-face (both physically and verbally) and are never acceptable (KCSIE 2022, Part 5: 446)

Tuition Extra are clear that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated.

Child on child sexual violence can happen both inside and outside of education settings. For the purposes of this policy and procedures when referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 specifically, rape, assault by penetration, sexual assault and causing someone to engage in sexual activity without consent (KSCIE 2022 Part 5: 450)

Sexual harassment is 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside education settings. Child on child sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated degraded or humiliated and/or create a hostile, offensive or sexualised environment. (Sexual violence and sexual harassment between children in schools and colleges, (KCSIE 2022, Part 5: 451-3)

3.2.7 Harmful Sexual Behaviour

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour". Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying HSB have often experienced their own

abuse and trauma. It is important that they are offered appropriate support (KCSIE 2022, Part 5: 454-457)

3.2.8 Child Protection

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

3.2.9 Significant Harm

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

Annexes A & B of KCSIE 2022 contains important additional information about specific forms of abuse and safeguarding issues. Tuition Extra requires all staff and tutors to read the annexes in conjunction with this policy and supporting procedures.

4. SAFER RECRUITMENT

The Safeguarding Vulnerable Groups Act 2006 requires Tuition Extra to carry out specific vetting (enhanced DBS and barred list checks) on staff or tutors if they work with children and young people.

In order to deter and prevent unsuitable individuals and inappropriate behaviour on the platform, Tuition Extra has a rigorous and robust recruitment process which incorporates the specific "Safer Recruitment" requirements highlighted in KCSIE 2022.

4.1 Interview

All tutors must successfully pass a live or online interview before being accepted to work.

4.1.1 ID Verification

Tutors will be required to provide proof of identification during their live interview. This will be verified by the Tuition Extra interviewer during the live interview.

4.1.2 Health Declaration

Tuition Extra requires that all tutors self-declare they are physically and mentally fit to deliver lessons, by asking them to sign the Terms and Conditions.

4.1.3 Verified Employment history

Tuition Extra discusses with candidates their employment history at the interview. Any gaps or inconsistencies are noted and explained.

4.1.4 Criminal Background Checks

We require all tutors to have a valid enhanced Criminal Background check to tutor.

Tuition Extra considers a criminal background record check to be valid if it:

- Is an up to date enhanced DBS check
- Is issued in the UK
- Details Children's Barred List Information
- Is relevant to the tutor's place of work and previous address history

4.2.1 New Tutors

All new tutors joining the service will be required to have an updated Enhanced DBS Check with Child Barring Service, unless they are registered on the DBS Update Service prior to starting with the service. Tutors who teach or reside in Scotland, Wales, NI or abroad may be subject to additional checks at the request of Tuition Extra.

Section 242 of KCSIE 2022 states "Once the checks are complete, the DBS will send a DBS certificate to the applicant. The applicant **must** show the original paper DBS certificate to their potential employer before they take up the post, or as soon as practicable afterwards."

Tuition Extra uses Ucheck, a certified screening provider to carry out any new criminal background checks. Ucheck provides a report to Tuition Extra on whether a tutor has convictions before sending a certificate to the individual. Tuition Extra uses this result to determine appointments.

All tutors must send a copy of their DBS certificate to the HR manager at Tuition Extra once it has been issued. Tuition Extra will retain a copy of the certificate for up to 6 months, in line with KCSIE 2022 guidance and Tuition Extra's Data Protection obligations.

Tutors will not be allowed to join the service until we have received the results of their DBS check from our DBS online screening partner.

Tutors on the Update Service will be expected to provide a copy of the original DBS certificate to Tuition Extra so a check can be conducted before they gain access to the service.

As an organisation using Disclosure information for the purpose of assessing an applicant's suitability for employment purposes we undertake to treat all applicants fairly. We undertake not to discriminate unfairly against any subject of a Disclosure on the basis of a conviction or other information revealed.

We are committed to the fair treatment of our staff, potential staff or users of its services, regardless of race, gender, religion, sexual orientation, responsibilities for dependants, age, physical/mental disability or offending background.

A Disclosure should only be requested after a thorough risk assessment has indicated that one is both proportionate and relevant to the position concerned. For those positions where a disclosure is required, all application forms, job adverts, and recruitment briefs will contain a statement that a Disclosure will be requested.

Unless the nature of the position allows us to ask questions about your entire criminal record, we will only ask about “Unspent” convictions as defined in the Rehabilitation of Offenders Act 1974.

We ensure that all those within the company who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences. We also ensure that they have received appropriate guidance and training in the relevant legislation relating to the employment of ex-offenders, e.g. The Rehabilitation of Offenders Act 1974.

We make every subject of a Disclosure aware of the existence of the Code of Practice and make a copy available on request.

Having a criminal record will not necessarily bar individuals from working in specific industries. It will depend on the nature of the position and the circumstances and background of your offences.

4.3 Reference Checks

All tutors are required to submit a minimum of 2 reference checks before gaining access to the service.

Reference checks must be:

- Addressed to Tuition Extra
- Either from previous employment, an academic source or a recognised professional who has been known to the applicant for a minimum of 6 months
- Confirm dates of employment
- Confirm that the candidate is suitable to work with children

References will be asked for during onboarding. If a tutor fails to have 2 complete and relevant references, they will not be permitted to tutor.

4.4 Overseas Checks

Tuition Extra collects an individual’s address history for the past 5 years, this is to identify if any additional and overseas checks are required on an individual working with children (as per Section 279 KCSIE). Tuition Extra defines overseas as “If they have been resident overseas for more than 3 months in one country.”

Tuition Extra requests this information from a tutor during onboarding. If an overseas address is provided a tutor is flagged into a “holding” phase before being

allowed to tutor. This gives Tuition Extra the chance to identify the correct check needed to take place, if an overseas check is not viable, Tuition Extra conducts a suitable risk assessment that supports and informs the decision making on whether to proceed with the appointment (281 KCSIE).

4.5 Tutor Training.

Tuition Extra believes that training and raising awareness of safeguarding issues, policies and procedures is fundamental to the development and maintenance of a safer environment, safer organisation and safer staff/ tutors.

We ensure that appropriate safeguarding training is provided to all staff and tutors to assist them in:

- preventing abuse
- recognising abuse
- recording concerns
- responding appropriately to allegations of abuse
- knowing who to tell, and
- when information can be shared.

Safeguarding training at the appropriate level to the role and responsibilities held is a mandatory element of all inductions for staff and tutors. Furthermore, safeguarding training is not regarded as a 'once only' activity, but as an ongoing development of skills and knowledge of safeguarding practices. Safeguarding training is in the form of an online course from a recognised provider and all details will be sent to the tutor so they may complete this training.

5. ONLINE SAFETY

Tuition Extra takes a holistic approach to online safety that aims to protect staff, tutors and students in their use of technology, and specifically our site.

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

As outlined in KCSIE 2022 (Part 1: 134) Tuition Extra recognise the considerable breadth of issues classified within online safety, which have been categorised into the following four areas:

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

- **commerce** - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group.

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

6. SOCIAL MEDIA ACCEPTABLE USE

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

6.1 Acceptable Use

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

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

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

Staff and tutors on the platform should be aware of both professional and social boundaries and should not accept or invite 'friend' requests from students or ex-students under the age of 18, or from parents on their personal social media accounts such as Facebook. All communication with parents should be through the Tuition Extra platform.

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

Following any report of inappropriate use of social media, the Company will conduct an investigation, this may lead to removal from the platform or disciplinary action taken.

7. SAFEGUARDING STUDENTS OF DIFFERENT AGES

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

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

All staff and tutor's undergo compulsory training. Tutor's are made aware of how they can report a Safeguarding concern.

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

8. SAFEGUARDING SEN STUDENTS

- Tuition Extra acknowledges that children with special educational needs (SEN) and disabilities can face additional safeguarding challenges as they may have an impaired capacity to resist or avoid abuse. They may have speech, language and communication needs which may make it difficult to tell others what is happening.
- Tuition Extra will ensure that children with SEN and disabilities, specifically those with communication difficulties will be supported to ensure that their voice is heard and acted upon.
- Members of staff are encouraged to be aware that children with SEN and disabilities can be disproportionately impacted by safeguarding concerns such as bullying. All members of staff will be encouraged to appropriately explore possible indicators of abuse such as behaviour/mood changes or injuries and not to assume that they are related to the child's disability and be aware that children with SEN and disabilities may not always outwardly display indicators of abuse.

WHAT TO DO IF YOU HAVE A SAFEGUARDING CONCERN

9.1 Reporting

It's vital that you report any safeguarding concerns to Tuition Extra so our Safeguarding Team can investigate fully. Tuition Extra uses an electronic reporting platform called My Concern. All staff and tutors will receive training on the use of My Concern as part of their induction.

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

- Remember that concerns are used in court cases and inquests as evidence.
- Reports should be objective and detailed.
- If you cannot access My Concern then contact a member of the Tuition Extra Designated Safeguarding Lead Team who will assist you with making a report.
- Please alert the team as soon as possible. It can take several hours to deal with even urgent concerns and the earlier we start the better.

To report a safeguarding concern to Tuition Extra:

- Log into My Concern and raise a new concern
- Get in touch via email, chat or phone.
 - Email – Steff.dowle@tuition-extra.co.uk
 - Tel 07951321233 or office 01227469156

9.2 Disclosure

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

- Keep detailed records of the concern with no further action at this time
- Liaise with the host school's Designated Safeguarding Lead.
- Liaise with the students SEN case worker or social worker
- Make a child protection referral to Children's Social Care

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and if appropriate the police) is made immediately.

Once the decision is made to make a referral the Safeguarding Team will contact the relevant Children's Social Care Team and make a telephone referral. This must be followed up in writing within 24 hours.

9.3 Emergency responses

Where a child is identified at immediate risk of harm then tutor will immediately contact the Designated Safeguarding Lead who will in turn contact the Police for the areas where the risk is located using 999. This is especially important when the child is being tutored at home and there is no independent school teacher present.

Within one working day of a referral being made, a local authority social worker should acknowledge receipt to the referrer and make a decision about the next steps and the type of response that is required.

Where tutors are delivering tuition to children and young people in a school or college, the Tuition Extra DSL/ Deputy must inform the school's Designated Safeguarding Lead/ Officer of any safeguarding concern.

9.4 Allegations against Directors

Tuition Extra recognises its duty to report concerns or allegations against its directors, staff, or tutors. All directors, staff and tutors must comply with the relevant Code of Conduct when performing their role in order to promote safer working practices.

Allegations of abuse against directors, staff or tutors can be made by either a child or an adult and should be made immediately to the DSL. Allegations made against the DSL should instead be made to another member of the leadership team who will inform the other team members. Another suitable senior member of staff will then be appointed to take the place of the DSL in response to the allegation.

This guidance should be followed when any Tuition Extra representative has:

- behaved in a way that has harmed a child, or may have harmed a child and/or
- possibly committed a criminal offence against or related to a child, and/or
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes in and outside responsibilities in Tuition Extra (KCSIE 2022, Section 1: Part 355-356)

Tuition Extra will deal appropriately and promptly with all allegations or concerns and refer all safeguarding concerns or allegations about its directors, staff or tutors immediately to the appropriate local authority designated officer (LADO) in accordance with local safeguarding procedures and practical guidance, in accordance with the statutory guidance [Working Together to Safeguard Children, 2018](#).

Tuition Extra will consider immediate suspension (without prejudice) if a safeguarding allegation is made against any director, staff member or tutor pending investigation when there is cause to suspect that another child(ren) is /are at risk of harm from their continued contact with children. Refer to KCSIE 2022, Part 4: 379.

Suspension will also be considered even if the allegation is not linked to their role or activity with Tuition Extra.

9.5 DBS Requirement and Duty to Report

Under legal duties to make referrals to the Disclosure and Barring Service, Tuition Extra will report any concerns about unsafe practice by any of its directors, staff or

tutors to the Disclosure and Barring Service (DBS). This applies where an individual has engaged in conduct that has either harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child. (KCSIE 2022, Part 4: 402)

If at any time Tuition Extra dismisses a director, member of staff or tutor due to relevant conduct, risk of harm or receiving a caution or conviction for a relevant offence (or the person has resigned or left that post in circumstances where they may have been removed), then a referral to the Disclosure and Barring Service will be made by the DSL.

9.6 Learning Lessons

Tuition Extra are committed to learning any lessons, alongside support and guidance with the LADO to determine whether there are any improvements to be made to our procedures, or to help prevent similar events in the future. This includes lessons learned about suspension, reinstatement after suspension. (KCSIE 2022, Part 4: 419-420)

10.7 Low Level Concerns

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

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

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

10. ANTI-BRIBERY AND CORRUPTION

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

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

10.1 Offence

- It is a criminal offence to:
- offer a bribe

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

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

10.2 Definitions of Bribery and Corruption

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

10.3 Scope

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

10.4 Gifts and Hospitality

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

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

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

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

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

10.5 Policy

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

personal advantage for an individual or anyone connected with the individual in a way that is unethical.

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

If you are offered a bribe, or a bribe is solicited from you, you should not agree to it unless your immediate safety is in jeopardy. You should immediately contact [insert name/position] so that action can be taken if considered necessary. You may be asked to give a written account of events.

If you, as an employee or person working on our behalf, suspect that an act of bribery, or attempted bribery, has taken place, even if you are not personally involved, you are expected to report this to contact [insert name/position]. You may be asked to give a written account of events.

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

Tuition Extra takes any actual or suspected breach of this policy extremely seriously and will carry out a thorough investigation should any instances arise. We will uphold laws relating to bribery and will take disciplinary action against any employee, or other relevant action against persons working on our behalf or in connection with us, should we find that an act of bribery, or attempted bribery, has taken place. This action may result in your dismissal if you are an employee, or the cessation of our arrangement with you if you are self employed, an agency worker, contractor etc.

11. WHISTLEBLOWING

Staff and tutors should feel able to raise concerns about poor or unsafe practice and potential failures in Tuition Extra's safeguarding regime. Appropriate whistleblowing procedures, which are suitably reflected in staff and tutors' induction, training and the code of conduct, are in place for such concerns to be raised with Tuition Extra's leadership team.

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

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

12. SAFEGUARDING GOVERNANCE

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

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

12.1 Tuition Extra Leadership Team

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

The Leadership Team will ensure that:

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

12.2 Tuition Extra Named Designated Safeguarding Lead and Deputies

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

The Named Designated Safeguarding Lead and Deputies will:

- Provide ready and accessible support and guidance to all staff, tutors and directors on safeguarding matters
- Manage all safeguarding reports and act as liaison for statutory services during any criminal or safeguarding investigation
- Ensure that serious incidents relating to safeguarding are reported immediately and managed effectively

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

Designated Safeguarding Lead

Name: Mr Steff Dowle

Phone: 07951321233 - 01227469156

Email: steff.dowle@Tuition-Extra.co.uk

Further information on the role and responsibilities of the Designated Safeguarding Lead, Deputies of the service can be found in the statutory guidance KCSIE 2022, Annex C.

12.4 Tuition Extra Staff and Tutors

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

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

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

13. COMPLAINTS

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

14. QUALITY ASSURANCE AND REVIEW

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

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

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

15. UNDERPINNING LEGISLATION AND GUIDANCE

15.1 Legislation

- Children Act 1989
- Human Rights Act 1998
- United Nations Convention on the Rights of the Child, 1991
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- The Forced Marriage (Civil Protection) Act 2007
- The Equality Act 2010
- Children and Families Act 2014
- Anti-Social Behaviour, Crime and Policing Act 2014
- Modern Slavery Act 2015
- Counter Terrorism and Security Act 2015
- Children and Social Work Act 2017
- Data Protection Act 2018
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021
- Children's Code (issued under SI25 DPA 2018, effective Oct 2021)

15.2 Guidance

- What to do if you're worried about a Child is being Abused, 2015
- Child Sexual Exploitation Guidance 2017
- Information Sharing Advice for Safeguarding Practitioners 2018
- Working Together to Safeguard Children 2018 places a general duty on schools to work and cooperate with other agencies to safeguard and promote the welfare of children. Tuition Extra is committed to do this by having an open, honest and transparent line of communication.
- Guidance for Safer Working Practice for those working with children and young people in education settings, May 2019

This document is an update by the Safer Recruitment Consortium of a document previously published for schools by the Department for Education and Skills (DfES). It was initially issued as those working with children had

expressed concern about their vulnerability and requested clearer advice about what constitutes illegal behaviour and what might be considered as misconduct. Education staff asked for practical guidance about which behaviours constitute safe practice and which behaviours should be avoided. This safe working practice document is NOT statutory guidance from the Department for Education (DfE); it is for employers, local authorities and/or the Three Safeguarding Partners to decide whether to use this as the basis for their code of conduct / staff behaviour guidelines.

- **Keeping Children Safe in Education 2022 (KCSIE)** is statutory guidance issued from the Department for Education under Section 175 of the Education Act 2002. Schools and colleges must have regard to this when carrying out their duties to safeguard and promote the wellbeing of children.
- **Sexual violence and sexual harassment between children in schools and colleges 2021** – the advice provided by the DfE sets out what sexual violence and sexual harassment is, how to minimise the risk of it occurring and what to do when it does occur or is alleged to have occurred.
- **Children’s Code** is a statutory code of practice that articulates how online services likely to be accessed by children should comply with the UK GDPR when using children’s data. The code was prepared under s121 of the DPA 2018 and issued under s125 of DPA 2018, coming into effect on 5 October 2021.