

# Circa Tutors Safeguarding Policy

## Our pledge

Circa Tutors provide online educational services to support, foster and enhance the academic capabilities of our students.

Therefore, our services put our team members and self-employed tutors into contact with children, in an online environment.

It is our primary objective and responsibility to ensure that all children partaking in our academic services are protected from any form of abuse. It is our duty to establish a protected environment, in which the well-being of our students is our prime concern when dealing with safeguarding issues.

To keep children safe, this policy booklet will define the policies, procedures and actions, that our team members, self-employed tutors and anyone in connection with Circa Tutors to take in response to cases of abuse and safeguarding issues.

We are committed to reviewing and updating our policy ever year to ensure good practice

This policy was last reviewed on the 16<sup>th</sup> August 2021

Signed:

Adil Akhtar, Co-founder

Nickeal Sidhu, Co-founder

## **Purpose and Scope of Policy Statement**

Circa Tutors work with children and young persons in academic activities, such as:

- 1 on 1 tutoring
- Courses
- Tutorials
- Group conferences

The purpose of this policy statement is to provide:

- A safe online environment for all the children, who receive academic services from Circa Tutors
- A clear set of policies, procedures, and actions for our team members and self-employed tutors to follow

Our policies are clearly communicated and are expected to be followed by anyone who partakes in a working relationship with Circa Tutors, this includes:

- Team members
- Self-employed Tutors
- Volunteers
- Contractors
- Students

## **Legal Framework**

This policy has been created with the basis of legislation and guidance that seeks to protect Children in the UK.

A full report of key child protection legislation can be accessed here:  
<https://commonslibrary.parliament.uk/research-briefings/sn06787/>

At Circa, we believe:

- That we have a duty and responsibility to ensure the welfare of the children and young people who develop a working relationship with us
- No child should be the victim of any form of abuse
- All children should be afforded the equality of protection, regardless of age, ability, sex, gender, disability, race, religion, circumstances, or ethnicity.
- Vulnerable children will require specific attention to ensure the same access to safety and academic opportunity

We will keep children safe by:

- Ensuring that we build, maintain, and protect a safe online working environment for the children, staff members, self-employed tutors and any other persons who work closely with Circa Tutors.
- Enacting and developing effective safeguarding policies and procedures to maintain good practice
- Enacting and implementing policies and procedures to effectively respond to any identification of child abuse
- Informing the relevant agencies and organisations when we are concerned of the well-being of the child
- Maintaining a professional standard of data and information storing
- Taking the necessary precautions and making the relevant checks when recruiting new staff members and contractors
- Implanting a code of conduct for staff members, self-employed tutors and contractors
- Ensuring that we use our policies and procedures to effectively manage any allegations made about team members, self-employed tutors, and contractors
- Ensuring that we have an efficient and working complaints process in place

## **Related Policies**

- This policy statement should be read in conjunction with the policies outlined below:
  - Code of conduct for adults
  - Code of conduct for students
  - Procedures
  - Reporting incidents
  - Allegations related to pupils
  - Allegations related to tutors
  - Online safety
  - Child data protection, storing and management
  - Confidentiality

## **Key Definitions**

### Legal background

We have created our policies, procedures, and actions in relation to the principles and policies within the UK legislation and the governments guidance.

Our policies take in consideration the relevant UK legislation such as:

Children Act 2004

Serious Crime Act 2015

Keeping Children Safe in Education 2018

Data Protection Act of 2018

Working Together to Safeguard Children 2018

## Care Act 2014

A full report of key child protection legislation can be accessed here:  
<https://commonslibrary.parliament.uk/research-briefings/sn06787/>

More information about Child Protections systems in the UK:  
<https://learning.nspcc.org.uk/child-protection-system>

## Definitions

Child – is anyone who has not reached their 18<sup>th</sup> Birthday, according to the Children's Act 2004.

Adult at Risk – anyone over the age of 18, who is unable to look after their own wellbeing and is at risk of putting themselves and others at harm.

Safeguarding Children – as defined in the working together to safeguard children, safeguarding is defined as:

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

Safeguarding Adults – as defined in the care and support statutory guidance of the Care Act 2014 as:

- Protecting the rights of adults to live in a safety and free from abuse
- Good practice to ensure adult's wellbeing is promoted
- Working together with organisations to prevent and stop both the risks and experience of abuse and neglect

Safeguarding concern – a situation in which it is identified that a child is at risk of being harmed or being harmed, by their own or someone else's actions.

Safeguarding allegation – if a safeguarding concern identifies the involvement of any person in relation to Circa Tutors, employed or self-employed, will be treated and categorized as safeguarding allegation.

Wellbeing – as defined in the care and support statutory guidance of the Care Act 2014 as being related to the following areas:

- Personal dignity (including treatment of the individual with respect)
- Physical and mental health
- Emotional wellbeing

- Protection from abuse and neglect
- Social and economic wellbeing
- Domestic, family, and personal
- Suitability of living accommodation
- Participation in work, education, training, or recreation

Abuse – is considered any form of maltreatment of a child or adult. Children and adults may be at risk from abuse from individuals in their homes, in a community setting, in an online sphere, at a family gathering and anyone they may encounter in their daily lives.

Abuse can take shape in a variety of ways including the 4 most notable forms of abuse:

### **As defined in Working Together to Safeguard Children 2018**

#### *Physical abuse*

A form of abuse which may include violence or threatened violence, that may involve hitting, shaking, burning, throwing, 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*

The persistent emotional maltreatment of a child such as to cause severe and persistent 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 cyber bullying), 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, though it may occur alone.

#### *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 the child is aware of what is happening.

The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse.

Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

### *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 caregivers)

Ensure access to appropriate medical care or treatment It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

## **Code of Conduct for Adults**

This code of conduct will outline the behaviour required from all our team members, self-employed tutors, volunteers, contractors, and any other personnel who have a working relationship with Circa Tutors.

When working with children, you have a duty to:

- Prioritise the welfare of the child above all else, the welfare and safeguarding of the child is paramount.
- Follow the policies and procedures set out in this booklet

- Create a safe online working environment. This includes being extremely aware and responsive to any safeguarding concerns.
- Stay within the law at all times
- To report all concerns / allegations of abuse to the appropriate contacts, in guidance to our procedures
- Report any breaches of this behaviour code to senior management

When working with children, you must:

- Listen, respect and value a child's opinion and contribution to your activity
- Treat all children fairly, without any bias, prejudice, discrimination.
- Respect the differences in age, ability, sex, gender, disability, race, culture, religion, circumstances, or ethnicity. It is imperative that you embrace and adapt to these differences.
- Use caution when discussing sensitive topics
- Ensure your contact with the child is appropriate and only relevant to the work you are partaking in.
- Be aware of confidentiality when working children.

In some cases, it may be necessary to break confidentiality in order to correctly follow child protection procedures. You must inform the child, at the earliest time, that you are required to break confidentiality rules.

## Online Environment

As we are predominantly providing online services, to create a safe online working environment for you children and young people, you must:

- Ensuring there is a suitable environment to call, bedroom calls for tutoring lessons should be discouraged.
- Tutors should ensure appropriate clothing is worn by all participants
- Tutors should ensure that distractions and noisy disturbances should be always minimised
- NOT consume alcohol, smoke or take any illegal substances before or during your online session with child learners
- Be on time to your teaching lessons
- Ensure for a neutral-coloured background when making video calls

## Unacceptable behaviour

When working with children, you must not:

- Allow any safeguarding concerns or allegations to go unreported
- Abuse the child in any way or put the child in a position to be abused
- Engage in any form of conduct that will ruin and degrade the reputation of Circa Tutors.
- Share any personal contact information (personal phone, personal email, social media profiles) with the children they are teaching
- Share any video conferencing link with any other person, other than the relevant learners
- Make improper suggestions to the child learner during their online sessions
- Make insensitive, improper, derogatory, racist, sexist, sexually suggestive or sarcastic remarks towards a child, a vulnerable adult, or any other member of staff.
- Develop any inappropriate relationship with any child or adult at risk
- Act in abusive or verbally threatening manner

## Role of a Designated Safeguarding Leader

The role of a designated safeguarding leader will be to manage and oversee the safeguarding process and take necessary action when required too. They are required to ensure the appropriate referrals are made within the guidance of statutory regulations.

- The Designated Safeguarding Leader will:
- Continue to promote, establish and embed a safeguarding culture across the entirety of the organisation
- Identify immediate risk of danger or harm and will take the appropriate pathway to dealing with such situation
- Make proposed changes to safeguarding procedures to ensure our policies and procedures are relevant to the current date.
- Interpret and comprehend the information to determine whether it constitutes a safeguarding allegation against a person who works under the organisation
- They will coordinate, manage and take appropriate action when dealing with a safeguarding concern / allegation.
- Decide upon whether a referral to an external organisation is required

The designated safeguarding lead will determine the appropriate action to take when dealing with a safeguarding concern. They will interpret, process and materialise the information and decide on exactly what action should be taken. Even if no action is taken, the process will be carried out thoroughly and in depth.



When a designated safeguarding lead decides it is an appropriate decision to make a referral to an external organisation, unless it is an emergency, the referral must be made within the next 24 hours of the decision. The referrals to statutory services must be followed up within the next 72 hours of the referral to be made, written feedback is a primary requirement for the designated safeguarding to follow up with.

## **Escalation Concerns**

Any personnel involved with Circa Tutors should proceed to follow the procedures and policies outlined in this booklet, however, they should escalate their concern if:

- There is an emergency situation, in which there is risk of immediate harm, and the designated safeguarding lead cannot be contacted
- If it concerns the designated safeguarding lead
- They have taken the appropriate actions but do not feel their concerns have been sufficiently addressed

You should escalate your concerns if you feel your judgement has come to make that decision. To escalate your concerns, you should report directly to the director (see contact details down below). If you feel your concern still needs to be escalated, you should:

- Report to the NSPCC
- Report to your local authority

## **Procedures for responding to safeguarding concerns**

*All staff members and self-employed tutors must be sent a copy of this booklet and signify they have read this section of the booklet. It is crucial that all staff and self-employed tutors are categorically aware of our safeguarding procedures.*

We have created a set of policies and procedures in relation to safeguarding, it is our aim to ensure the safety of all pupils who work with Circa Tutors.

This section of the policy booklet will define:

- How to identify that a child is suffering from abuse
- What to do if a child discloses information to you
- How to report your safeguarding concern
- How you should record your safeguarding concern
- The safeguarding report form

### Identifying concerns

It is the duty of all staff members and self-employed Circa Tutors to be vigilant when looking for abuse, not all pupils will feel comfortable enough to disclose information to you.

Therefore, you should look for the following signs as indicators of abuse:

- Reluctance to participate in the tutoring session
- Reluctance to show their webcam
- Signs of physical harms of abuse
- Self-harm
- Aggressive behaviour
- Sudden changes in their natural behaviour, i.e., swiftly changing moods from quiet to aggressive
- The continual use of abusive language
- Constantly tired or looked severely unkept
- Reckless behaviour in regard to their own safety

However, some pupils will make a disclosure of information to you. When a pupil discloses information to you:

- Stay calm, do not overreact or exacerbate the situation
- Try not to interrupt their disclosure, listen carefully to what is being said
- Do not promise to keep their concern a secret, it is vital you do not make such promise as information disclosed with you will need to be communicated to others
- Find an appropriate time to explain that the information they have disclosed will be communicated to others
- Offer words of reassurance and comfort
- Do not ask leading or investigative questions, let pupils disclose information to you at their own pace
- Report verbally to the designated safeguarding leader, it is your duty to disclose this information to the DSL, even if the pupil claims they will do it themselves.
- Once verbally reported, complete the written report form and send it to the DSL
- Reassure the pupil to affirm that they are not to blame, and they have done the right thing by disclosing this information to you.

## Reporting

When reporting a safeguarding concern:

- Following the disclosure of information, you are at duty to report it to the designated safeguarding lead as soon as possible. This should not take longer than 24 hours.
  - Verbally report your concern and the information you have received to the DSL
  - You are then required to submit a written record to the DSL (information about the written record can be found below)
- 
- If you cannot contact the Designated Safeguarding Lead, you are required to contact any of the key contacts listed down below in the booklet

- Statutory agencies must be noted if the concern is serious or there is an immediate risk of harm
- Once a safeguarding concern has been made, the parents / guardians of the child must be noted of the concern that has been raised (do not inform the parents / guardians if you believe this will only lead to further risk of harm). Take advice from the DSL on how to approach this situation.
- If there is immediate danger or a suspicion of immediate danger , upon being informed of the concern, you must contact 999. Do not wait to report to the DSL, you have a responsibility to act proactively to such concern.

*Remember, it is your responsibility to report any concern that has been raised – it does not matter whether you determine there to be abuse or not, it is imperative you report any form of concern that has been disclosed to you or that you have identified.*

## Recording the concern

You are required to make a written record of your safeguarding concern; your written record must be:

- Accurate and detailed
- made as soon as possible, no later than 24 hours after the information has been disclosed to you.
- Sent to the Designated Safeguarding Leader
- Factual and comprehensive

Your safeguarding report form can be found down below.

Once you have made your report, you should email it to:

Adil Saheil Akhtar  
saheil@live.co.uk

## **Concerns relating to tutors**

There are set procedures that need to be followed if a concern is raised about a self-employed Circa Tutor or staff member.

It is imperative to understand the welfare of the child is the utmost priority, no tutor will suffer detrimentally for raising a concern about another tutor.

If a concern is made against a tutor or the designated safeguarding leader, it should be raised with the local authorities.

Alternatively, you can contact the NSPCC helpline number – 0800 028 0285

We will take every allegation against a staff member or self-employed tutor very seriously; we will provide full cooperation with the agency or organisation dealing with the concern. A record of the concern will be kept for further disciplinary measures.

## **Safeguarding Report Form**

### **1 – Your information (Person making the report)**

Name(s):

Date of Birth:

Role:

Contact Number / Email:

Date of Identified Concern:

Date and Time of making the report:

### **2 – Child's information**

Name(s):

Date of birth:

Age:

Child's contact number:

Contact email:

Parents name(s):

Parents Contact Number:

Parents Contact Details:

Home Address of Child (if deemed necessary):

Any other relevant information:

### **3 – Information about the Circa Tutors employee or self-employed tutor that the allegation / concern has been raised about.**

Name(s):

Role:

Date of Birth:

Contact Number / Email:

#### **4 – Safeguarding Concerns**

Are you reporting your own concerns or responding to concerns raised by someone else?

Responding to my own concerns:

Responding to concerns raised by someone else:

If the concern raised by someone else, please provide further information:

Name(s):

Role:

Email:

Contact Number:

#### **5 – Incident Details**

Date and Time of Incident:

Incident Details: (please provide as much relevant information to the incident as possible, provide as much description of the details of the incident as you can)

Has the Child / Adult at risk disclosed an account of what happened? (please give details of their account of the incident)

Are there any witnesses to the incident?

If so, provide further information for these witnesses:

Name(s):

Role:

Relationship with child:

Email:

Contact Number:

## 6 – Actions Taken

Please provide details of action taken to date:

Please state if there is any immediate risk of danger:

Has the incident been reported to any external agencies? If so, please provide further information about the agencies:

Name:

Contact Number:

Contact Person:

Email Address / Contact Number:

Any known previous history of concerns or abuse or allegations?

Any further comments:

Your Signature:

Date:

Please Email this form to: [saheil@live.co.uk](mailto:saheil@live.co.uk)

## Online Safety Policy

As predominantly all of our classes take place in an online environment, we recognise the need for a coherent and comprehensive online safety policy. This is to ensure that we provide a safe online environment in which all children are free from any kind of abuse.

We understand that:

- The online environment can present many challenges and risks to the safety of children
- All children should be afforded the equality of protection, regardless of, age, ability, sex, gender, disability, race, religion, circumstances, or ethnicity.
- It is our duty to ensure that our online tutoring platform is safe and free from any form of abuse

We will seek to create a safe online platform by:

- Ensuring all staff and self-employed tutors comprehend and are coherent in the procedures and policies outlined in this policy booklet
- To create an encouraging environment, in which students and teachers are aware of appropriate behaviours to take online
- Enacting clear, consistent and organised procedures to respond to any online safeguarding concern / allegation.
- Continuing to review our procedures to ensure relevancy to current statutory laws
- Ensuring that all staff members and self-employed tutors have had professional safeguarding training
- Ensuring that we have a coherent data protection policy
- Taking the relevant steps to identify any risk and then use the necessary actions to combat the abuse

If online abuse occurs, we will:

- Follow the necessary procedures to combat and report the abuse
- Ensure our response to any concerns / allegations is swift and thorough
- Ensure that all safeguarding concerns / allegations are concluded eventually, we will make it our duty to continue to follow through with any cases of abuse or any other safeguarding concerns



## **Child Data Protection**

### Confidentiality

All staff members, self-employed tutors and any personnel who have a working relationship with Circa Tutors are aware that matters relating to child protection are extremely sensitive and confidential. Any child protection concerns, or allegations will not be discussed anywhere other than the relevant communication channels. All communication, in regard to child protection and child data, will follow the guidelines set out in this booklet.

### Child Data Protection

You are responsible for proactively sharing concerns / allegations as soon as it is identified, the relevant forms should be filled out and sent to the relevant organisational personnel.

The fear of sharing information about a safeguarding concern / allegation should not prevent you from your safeguarding duties. The Data Protection Act 2018 and the General Protection Regulations 2018 do not prevent you from reporting information in relation to safeguarding. You are not breaking confidentiality rules by sharing information about a safeguarding concern, as the welfare of the child or adult at risk is the utmost priority.

You should be mindful of who you are sharing this information to, if possible, you should receive consent from the child to share the information. However, we understand that serious harmful situations should be reported and shared, even without obtaining consent.

The designated safeguarding leader should be informed of all safeguarding concerns. They will manage the process of exactly how to share information. It is imperative that the designated safeguarding leader is contacted before information of a concern is passed on to an external organisation. However, in cases of serious risk or harm, it is appropriate to contact the external organisation without having contacted the designated safeguarding leader first.

Child protection records and information is processed for limited purposes, adequate, relevant, not excessive, not kept longer than necessary and is secure. This is in line with the principles in the Data Protection Act 2018

Child protection records will be safely and securely stored on our network and will have limited access availability. Only relevant personnel will have access to such data. Any request to see child protection records, from pupils or parents, will be referred to our designated safeguarding leader, who will then provide guidance on the matter.

Designated Safeguarding lead contact:

Adil Saheil Akhtar  
saheil@live.co.uk

## Key Contacts

Adil Saheil Akhtar  
Co-Founder, Designated Safeguarding Lead  
[Saheil@live.co.uk](mailto:Saheil@live.co.uk)  
07979797998

NSPCC helpline:  
<https://www.nspcc.org.uk/>  
0808 800 5000

Childline:  
<https://www.childline.org.uk/>  
0800 1111