

Bethan Smith Tutoring: Safeguarding policy statement

(for online and in-person tutoring)

The purpose of this policy statement is:

- to protect children and young people who receive Bethan Smith Tutoring's services from harm. This includes the children of adults who use this service.
- to provide staff and volunteers, as well as children and young people and their families, with the overarching principles that guide our approach to child protection. This policy applies to anyone working on behalf of Bethan Smith Tutoring, including paid staff, volunteers, sessional workers.

In this document (from p4) you will find policies regarding;

- 1) Role description for the designated safeguarding officer
- 2) Dealing with disclosures and concerns about a child or young person
- 3) Managing allegations against Bethan Smith
- 4) Recording concerns and information sharing
- 5) Child protection records retention and storage
- 6) Code of conduct for staff and volunteers
- 7) Behaviour codes for children and young people
- 8) Photography and sharing images guidance
- 9) Online safety
- 10) Anti-bullying
- 11) Managing complaints
- 12) Induction, training, supervision and support

I (Bethan Smith) believe that:

- Children and young people should never experience abuse of any kind
- I have a responsibility to promote the welfare of all children and young people, to keep them safe and to practise in a way that protects them.

I recognise that:

- the welfare of children is paramount in all that I do and in all the decisions I take all children, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation have an equal right to protection from all types of harm or abuse
 - some children are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues
- working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people's welfare. I will seek to keep children and young people safe by:
 - valuing, listening to and respecting them
 - appointing a nominated child protection lead for children and young people, a deputy and a lead trustee/board member for safeguarding
 - adopting child protection and safeguarding best practice through our policies, procedures and code of conduct for staff and volunteers
 - developing and implementing an effective online safety policy and related procedures
 - providing effective management for staff and volunteers through supervision, support, training and quality assurance measures so that all staff and volunteers know about and follow our policies, procedures and behaviour codes confidently and competently
 - recruiting and selecting staff and volunteers safely, ensuring all necessary checks are made
 - recording, storing and using information professionally and securely, in line with data protection legislation and guidance

- making sure that children, young people and their families know where to go for help if they have a concern
- using our safeguarding and child protection procedures to share concerns and relevant information with agencies who need to know, and involving children, young people, parents, families and carers appropriately
- using our procedures to manage any allegations against staff and volunteers appropriately
- creating and maintaining an anti-bullying environment and ensuring that we have a policy and procedure to help us deal effectively with any bullying that does arise
- ensuring that I have an effective complaints procedure in place
- ensuring that I provide a safe physical environment for our children, young people, staff and volunteers, by applying health and safety measures in accordance with the law and regulatory guidance
- building a safeguarding culture where staff and volunteers, children, young people and their families, treat each other with respect and are comfortable about sharing concerns.

- 1) The primary safeguarding officer is Bethan Smith. If you have any concerns about the well being or safety of any of the children or family members who attend lessons, I am your first contact. I will listen carefully, record the concern and as quickly as possible pass on any information necessary to local authorities/ external supportive bodies, such as Wiltshire Multi-Agency Safeguarding Hub (MASH) and/or the police.
- 2) In dealing with disclosures from young people, I will listen and if suitable at the time, write down what is said. I will be careful not to lead individuals in their words or thoughts and ask too many questions. I will reassure the child or young person but make it clear to them that I am not able to keep secrets. I will pass on any concerns I have to relevant safeguarding authorities, as soon as possible.
- 3) If there are allegations concerning the behaviour of Bethan Smith, please contact (asap) the deputy safeguarding officer and pass on any information or concerns to them directly. Details for the deputy are listed below.
- 4) I will record (and date) any safeguarding concerns carefully and efficiently, as I am aware any information presented, seemingly little or big, may form part of a 'larger safeguarding picture;' becoming clearer over time. I will only share information with relevant authorities and for the purpose of supporting/ keeping safe the child/children concerned. In short: any information recorded remains confidential and unless required by safeguarding authorities. *(please also see GDPR policy)*
- 5) Records relating to child protection will be kept for 7 years after Bethan Smith's last contact with the child and their family.
- 6) Code of conduct for staff and volunteers - Bethan Smith is the sole staff member.

7) Contact with students and parents/guardians. Primary contact with parents/guardians maybe made through Whatsapp or Facebook messenger. This should only be a means of communication between Bethan Smith and parents/guardians. In most cases, communication will then move to email contact and pupils are welcome to email Bethan Smith with questions regarding lesson content or to send work - but only if their parent/guardian has read the email first. It is the responsibility of Bethan Smith to report to parents and/or safeguarding authorities any concerns she may have and parent/guardian's responsibility to regularly check email correspondence sent.

8) Behaviour codes for young people and children; it is expected that children dress appropriately for both online and in-person lessons; ie: children should be dressed appropriately for their age.

Children should be considerate of the language they use online (towards other students and Bethan Smith), being particularly aware of using strong words. It is expected that children use words which are encouraging to others and that other people's views/beliefs are respected at all times. Each child and or young person on the course must be treated with courtesy at all times.

Children should be encouraged to speak out if they feel uncomfortable with any of the topics of conversation or activities and may have a chaperone (such as a parent or guardian) with them during the lesson, should this be of help to them. Any additional adults who are with children online, should make themselves known to Bethan Smith at the start of a lesson, as a safeguarding precautionary measure.

9) All photography and imagery taking/sharing and publishing is strictly prohibited. As Bethan Smith tutoring is predominantly online, family members may occasionally be seen or heard on screen. Any family member who falls into this category **MUST** also adhere to these strict rules and should only be seen or heard for the shortest possible time*

(see below), unless consent has been given by all parties involved in the lesson.

*Occasionally, a young person may require an adult to remain next to them during a lesson and/or speak or write for them - for SEND or mental health needs. If this is the case, adults must aim to be off camera as much as possible and Bethan Smith, tutees and their adults/guardians will be made aware of this arrangement and must agree to this before lessons commence. In the unlikely event of any confidential information being made known during a lesson, the supervising adult agrees to Bethan Smith's strict code of conduct regarding information as set out by the GDPR.

- 10) Lessons will be recorded for safeguarding purposes. They will be stored on google drive and viewed only if necessary for safeguarding purposes. All recorded lessons are treated as highly confidential and only Bethan Smith and the deputy safeguarding officer (if required) will initially have access to them and only look at them if this is needed. Recorded information or footage from lessons may be passed onto external organisations such as MASH or the police if requested.
- 11) Online safety - before taking part in Bethan Smith lessons, parents and guardians must make sure their children/young are aware of the potential dangers associated with online lessons. Participants must understand the boundaries of lessons and what is likely to happen (online teaching!) and what should not happen during a lesson. Pupils must be aware that if at any point in lessons they are concerned about a discussion or activity then can leave the lesson and must speak to their 'grown up' immediately. This policy also stands if they feel uncomfortable with anything they see or hear from another family or young person during a lesson.
- 12) In-person tuition safety; students may study, one-to-one with Bethan Smith with the door of the study room open or in a garden area near to an open door, to enable conversations to be heard. Pupils may have a

parent or guardian sit with them and support them during lessons, if this is helpful/re-assuring to them. Parents/guardians are also encouraged, if they would like to pop in to one-to-one lessons at any time, thus ensuring transparency and professional conduct at every point of the lesson. A parent/guardian must also be in the house, if I am tutoring. As I am working in family houses, if I should become aware of any safeguarding concern regarding other children or adults in the house, I will also pass this information onto relevant authorities if need be.

- 13) Anti-bullying policy. Please report any bullying seen or heard to Bethan Smith or the deputy safeguarding lead, if applicable. All children and young people are to be respected, listened to and encouraged at all times. Children must be given an equal platform to present their views in a safe and supportive environment. Bullying of any kind will not be tolerated and if found, Bethan Smith has the right to end lessons with those who are bullying. If an upfront lesson payment has been made, no refund will be given.

- 14) Managing complaints - any complaints against Bethan Smith should be referred to the designated deputy officer.

In the case of complaints against other students (or their family members) please refer complaints to Bethan Smith, who will document these and deal with concerns in a timely manner. If you feel that a complaint has not been dealt appropriately, please pass on any concerns to the deputy safeguarding officer.

- 15) With regards to training, supervision and support, Bethan Smith will take regular, up-to-date, child safeguarding training (latest date 02/09/2021). Bethan Smith's conduct will be overseen by the designated deputy safeguarding officer, who may choose to 'pop in' on any lesson. A visit from the deputy during a lesson, remains unlikely and would be infrequent but is in place as an extra safeguarding precaution and equally extra quality teaching assurance for parents/guardians. This procedure is in place to ensure robust safeguarding features are in place at all times during lessons.

Name and contact details of Safeguarding lead/deputy:

Contact details Nominated child protection lead Name: Bethan Smith

Phone/email: bethansmith@gmx.com 07817924548

Deputy child protection lead(s) Name: Miss Cathleen Liu

Phone/email: mind.therapyservices@gmail.com 07795380200

Other useful numbers:

Wiltshire Multi-Agency Safeguarding Hub (*MASH*) 0300 456 0108

<https://www.wiltshirescb.org.uk/>

Pan-Dorset Safeguarding Partnership tel: 01305 221196 **or** 01202

458873 <https://pdscp.co.uk/>

NSPCC Helpline: Tel 0808 800 5000

*****If you ever suspect a child to be in immediate danger of any form of abuse or harm - please call 999.*****

The GDPR (General Data Protection Regulation)

The GDPR (General Data Protection Regulation) is currently the strictest privacy law in the world. As the founder and deliverer of Bethan Smith Tuition, I declare that I will undertake work in accordance with its rules and regulations.

Article 5 of the GDPR contains six principles by which all personal data must be processed.

They are:

1. Lawfulness, fairness, and transparency: obey the law; only process personal data in a way that people would reasonably expect; always be open about your data protection practices.
2. Purpose limitation: you must normally only process personal data for the specific reason you collected it and nothing else.
3. Data minimisation: don't process any more data than you need.
4. Accuracy: make sure that any personal data you hold is adequate and accurate.
5. Storage limitation: don't store personal data for longer than you need to.
6. Integrity and confidentiality: always process personal data securely.

I declare that Bethan Smith Tutoring will adhere to these principles at all times.

I will only collect the minimum amount of data required to carry out tutoring and will only pass on (any) personal details, if I believe this to be helpful in the investigation of any safeguarding concerns.

What information will I collate and store?

I will collate; names and email addresses of parents/guardians and students. I will not pass on this information, unless there is a safeguarding concern.

I will request the name and age of students I am tutoring - to aid lesson planning and support student learning. I will not pass on this information, unless there is a safeguarding concern.

Any informal information gathered during lessons, such as preferences for lesson topics and the sharing of academic difficulties will be used for informing and shaping future topics and lessons but will not be passed on to any other person or organisation.

I will request - though it is not a necessity to provide, any information about SEND or other conditions such as 'extreme anxiety which will aid and guide my tutoring. This information will not be passed on, unless there is a safeguarding concern.

Payments will be made through PayPal and as such, parents/guardians are expected to review and check PayPal's GDPR policies. By making payments through Paypal parents and guardians are agreeing to the terms and conditions set out by PayPal, as to their personal data.

Payments made by bank transfer are subject to the GDPR as set out by your and my bank (which is the Cooperative Bank) and parents must read, be aware and accept these terms before making payments.

As lessons are mostly presented on google classroom, parents must be aware that lessons will be recorded for safeguarding purposes only. As lessons are 'live' - occasionally 'unplanned' situations may occur where personal information may be shared by a student. If this happens, I will remind the student that other students can hear what is being said and that it is best to keep some information 'private.' I will always speak to parents/guardians, if I feel this has happened, so there is transparency throughout.

I am aware that I am not allowed to retain information unless there is a legal justification for doing so.

The legal bases for processing a person's personal data are:

1. Consent: you have earned their permission in a GDPR-compliant way
2. Contract: you need to process their personal data to fulfill a contract
3. Legal obligation: you'd be breaking the law if you didn't process their personal data
4. Vital interests: their life (or someone else's life) depends on you processing their personal data
5. Public task: you need to process their personal data to carry out a task that's in the public interest
6. Legitimate interests: processing their personal data is in your interests

Number 6 (above) - this policy clearly sets out which information I will 'gather' and hold and that all information is for purposes of 'legitimate interest' - to support students with their study whilst keeping the issue of safeguarding at the forefront of my thoughts and actions. I will keep information for 2 years after the date of my last tutoring. This is to provide further support to an individual or family if required. I will not pass information stored to any other individual or organisation during this time.

Any information which has been recorded relating to safeguarding concerns must be retained by Bethan Smith Tutoring for 7 years from when the complaint/query was made.

Parent/Guardian rights with regard to data protection

It is important for parents to be aware of their own rights in regards to personal data, These rights are:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure (known as "the right to be forgotten")
5. The right to restrict processing
6. The right to data portability
7. The to object
8. Rights in relation to automated decision-making
9. Parents have the right to refuse a request for information and Bethan Smith firmly states there will be no penalisation towards any adult or young person, if this right is exercised.

Bethan Smith is aware of the rights listed above and will adhere to these principles. If you have any complaint about the way in which your personal information is being collected and stored - your first action should be to notify Bethan Smith Tutoring, who will seek to investigate any concerns or misconduct thoroughly. However, you can also lodge a complaint with the Information Commissioner's office which is the UK data protection regulator.

Please be aware that revisions may (occasionally) be made to this data protection policy and that it will be regularly reviewed. If this is the case, there will be a period of at least 28 days notice given for any changes to be reviewed, agreed or refused by parents/guardians. Thus, a clear date will be set by which any changes will come into force. As a small business which very specific aims and objectives, I do not envisage this will happen very often.

Policy written by Bethan Smith, 'Bethan Smith Tutoring' on the 4th Sept 2021