

Safeguarding Policy

Animal Assisted Education UK Limited (“**AAEUK**”) is committed to providing online tuition to children at the highest standard in a safe environment. The purpose of this policy is to protect our students from harm and provide our staff, students and parents/guardians with the overarching principles that guide our approach to child safeguarding.

This policy applies to all employees, workers, contractors, consultants and other personnel that is associated with AAEUK (together, “**Personnel**”), as well as any third parties who enters into business relationships with AAEUK.

Please read this policy carefully; your compliance with this policy is mandatory. Employees who breach any part of this policy may be subject to disciplinary action. Contractors, consultants and all other third parties who breach this policy will be deemed to have committed a material breach of their contract with AAEUK which may result in termination of their engagement.

This policy does not form part of any employee's contract of employment. Animal Assisted Education UK will regularly review this policy and we may amend this policy from time to time.

1. Our Approach

As an online tuition service provider, we understand that there are limitations as to what we can do in terms of child safeguarding. Unlike schools, we do not have any physical presence and therefore cannot interact with children in person. Nonetheless, we firmly believe everyone must play their part to keep our children safe. At AAEUK, we want to make sure our safeguarding standard is in accordance with that in schools, academies and other educational establishments where possible. By adhering to government guidelines and legal requirements, we want to not only ensure the safety and wellbeing of our students, but also put

parents at ease while their children are engaging with our products and services.

Child Centred Approach

Our mission is to advance education through technology and love for children around the world. We take a 'child centred approach' not only in respect of safeguarding, it is the very core foundation of our business. We believe that:

- keeping children in focus when making decisions about their lives and working in partnership with them and their families;
- welfare of children is paramount and they are best looked after within their families, with their parents playing a full part in their lives, unless compulsory intervention in family life is necessary;
- children should never experience abuse of any kind; children may be vulnerable to neglect and abuse or exploitation in their day-to-day lives;
- as an organisation who works with children, we have a responsibility to keep children safe and we will use our best endeavours to ensure the wellbeing of our students.

We seek to provide a safe education environment for our students by:

- adopting child protection and safeguarding best practices through our policies, procedures and code of conduct for our tutors and staff members;
- developing and implementing an effective online safety policy and related procedures;
- providing effective management for staff through supervision, support, training and quality assurance measures so that all staff and volunteers know 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;

- sharing information about safeguarding and good practice with children and their families via leaflets, posters, group work and one-to-one discussions;
- making sure that students and parents/guardians 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 students, 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 up-to-date policies and procedures in place to deal with bullying (including cyber-bullying) effectively; and
- building a safeguarding culture where staff and volunteers, students and their families, treat each other with respect and are comfortable about sharing concerns.

As our primary address falls into the West Mercia catchment area, we adhere to and follow the guidance in The Herefordshire Safeguarding Children Partnerships document, Multiagency Safeguarding Arrangements (MASA).

The three safeguarding partner officers that have been given delegated authority to jointly lead the partnership are:

Herefordshire Council: Represented by Darryl Freeman the Director of Children's Services and their Service Director – Victoria Gibbs

The Herefordshire and Worcestershire Integrated Care Board: Represented by Kath Cobain the Chief Nursing Officer and the Head of Safeguarding & Designated Nurse for Safeguarding Adults and Children – Heather Manning

West Mercia Police: Represented by Helen Wain the Superintendent Policing Commander for Herefordshire Local Policing Area and the Detective Chief Inspector for the local policing area – Ross Jones

2. Our Facilitators

At present we only have one facilitator at AAEUK, however any future contracted facilitators will only be contracted upon evidence of a subject specific teaching qualification. Additionally, all of our facilitators have or will, undergo a vigorous vetting process; it is also our policy to carry out DBS checks (or the equivalent checks for non-UK domiciled Personnel) on all of our facilitators to ensure they are suitable to work with children.

Additionally, all AAEUK facilitators are and will, be bound by our internal Tutors' Code of Conduct (as well as our general Code of Conduct for our staff), these include (but are not limited to):

- Ensure the classroom environment does not display any inappropriate images or documentation capable of being viewed by the student or parent/guardian when conducting online lesson.
- Ensure the classroom environment, tutor and student's behaviour is culturally sensitive. This includes dressing modestly and removing objects which may be distracting, such as alcohol, posters, etc.
- Treat students fairly and without prejudice or discrimination: students who have a disability or come from an ethnic minority or cultural group can easily become victims of discrimination and prejudice which may be harmful to the student's wellbeing.
- Always ensure the language used is appropriate and not offensive or discriminatory.
- Ensure any contact with the student is appropriate to their role as a facilitator and confined to the relevant online lesson.
- Not make any inappropriate suggestions to a student.
- Not send unsolicited communications to the student or parent/guardian.
- Value and take students' contributions seriously.
- Report any dispute with a student or parent/guardian to Animal Assisted Education UK.
- Report any inappropriate behaviour or illegal activity identified within an online lesson by the student or a third party, to the DSL.

- Ensure that if no parent/guardian is present during an online lesson that the student is comfortable to continue the session; if not, they can terminate the session.
- Be aware that facilitators are being recorded and lessons are available for playback.

3. Our Online Lessons

Every online virtual classroom, will be monitored by the classroom facilitator, during sessions and intermittently out of sessions. Every student has their own whiteboard link, which can be accessed at any time by the facilitator or the student and so checks of any content will be regularly conducted.

All of our online lessons are recorded and monitored for safeguarding purposes, via our dedicated online whiteboard provider, GroupWorld. Online lessons will normally be recorded and retained for up to 3 months for review by the parents/guardians of the student or in accordance with our policies and procedures. The recordings may also be reviewed for the purpose of investigating any reports/allegations of misconduct made in any particular online lesson. These records may be accessed by UK law enforcement or other relevant child protection agencies or local authorities where a criminal offence or an abuse may have occurred. All intellectual property rights and the ownership of the recordings are properties of Animal Assisted Education UK.

What we expect from our students

As a student of AAEEK, we expect you to:

- treat facilitators with respect and fairness, and not subject them to abusive behaviour or language;
- not make any improper suggestions to a facilitator;
- not engage in inappropriate communication with a facilitator;

- report any inappropriate behaviour or illegal activity by a facilitator or other persons within an online lesson or dispute with a facilitator to your parents/guardians; and

If a student uses or displays inappropriate language or behaviour in a lesson or towards the facilitator, the facilitator should politely request the student to refrain from doing so. If the language or behaviour continues, the facilitator will explain that he or she will report the matter to AAEEK, who may suspend the student from attending any further lessons or from using any services provided by AAEEK. We reserve the right to withdraw our services, immediately and without notice, in the event that inappropriate language, actions or behaviour imposes threat towards the health, safety and wellbeing of our staff and students.

What we expect from the parents/guardians

Parents/guardians of our students are responsible for:

- the selection of the course(s) and make any reasonable checks to ensure the course is suitable for their child(ren);
- making sure your child is behaving appropriately and respectfully in accordance with this policy during online lessons;
- the welfare of your child(ren) during online lessons;
- being present or available during an online lesson so any concerns encountered by your child(ren) can be reported as soon as possible;
- ensuring our facilitator will be treated with respect and fairness and will not be subjected to abusive behaviour or language during online lessons;
- ensuring that no improper suggestions are made by either the facilitator or student;
- ensuring the student has no inappropriate communication with the facilitator outside the lesson;
- report any inappropriate communications between the facilitator and student to us;
- report any dispute with a facilitator to AAEEK;
- report any inappropriate behaviour or illegal activity by a facilitator to us
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If a parent/guardian is alerted to any inappropriate behaviour/language by the facilitator:

- you should immediately speak to the facilitator and state your concern, you may choose to terminate the session as appropriate. The incident should be reported to us as soon as possible so that AAEEK may investigate and take appropriate actions where necessary;
- you should have no further contact with the facilitator involved in the incident;
- any allegations of abuse will be dealt with seriously in accordance with this policy;
- AAEEK may suspend a facilitator (if necessary and at our discretion) until the incident has been fully investigated. The parent/guardian will be informed of the resolution.

4. Prohibited Acts

The following acts are strictly prohibited by AAEEK; all Personnel of AAEEK must not:

- Abuse of position of trust, grooming, causing a child to engage/watch in sexual activities or having a sexual relationship with a minor;
- Display any inappropriate images/items or using/making inappropriate verbal/written/physical remarks during teaching sessions.
- Exposing children to violent/sexual/offensive/illegal materials.
- Use inappropriate/aggressive/sexual innuendos/racist/sexist/homophobic or any other language/body language/foreign languages that could cause offense to others during a teaching session.
- Bullying/cyberbullying/insult/abuse/make threats to a child, including but not limited to physical, verbal and emotional bullying and abuse, such as name calling, hitting, pushing, spreading rumours, threatening, undermining, humiliating.
- Engaging a child in a 1-on-1, closed environment setting.
- Detain any children without their parents' consent.
- Prejudice, discriminate, victimize or treat any students unfairly based on certain characteristics of the student (such as age, sex, race, religion, sexual orientation, disability, etc.).
- Neglect a child or if you feel that a child is in danger/suffering from harm, you must contact the Safeguarding Officer.
- Destroy, conceal, or fabricate complaints from students or parents.

- Hire anyone who may cause harm to children.
- Exploiting children/child labour, child slavery.
- Share/publish/process children's personal data/image without parents/guardians' explicit consent.
- Failure to recognise or willingly turning a blind eye on child safeguarding issues.
- Allow any unknown/unidentified/unauthorised third parties to join/participate in online lessons. Facilitators must ensure children's safety/cybersecurity within the classroom.

5. Information sharing in relation to safeguarding

Here at AAEUK, we will only process Personal Data in accordance with our Data Protection Policy. However, under the General Data Protection Regulation ("**GDPR**") and Data Protection Act 2018, we may share information without consent if, in our judgement, there is a lawful basis to do so, such as where a child's safety may be at risk.

All Personnel must take responsibility to be alert to circumstances in which it may be necessary in sharing the information they hold; we must not assume that someone else will pass on the information, which may be critical to keeping a child safe. Personal information can be shared lawfully if it is to keep a child or individual at risk safe from neglect or physical, emotional or mental harm, or if it is protecting their physical, mental, or emotional well-being.

If a student discloses abuse to a facilitator, the facilitator should reassure the child that he/she will try to help by informing the people who can help. Report should first be made to the AAEUK Designated Safeguarding Lead. The facilitator should not jump to conclusions or act emotionally, promise to keep it secret or make promises that the facilitator cannot keep. Even if a child requests the information to be kept confidential, it is important to still report the abuse. However, it should not be shared with anyone who does not need to know.

All Personnel must record information sharing decisions, whether or not the decision is taken to share. If the decision is to share,

reasons should be cited including what information has been shared and with whom. If the decision is not to share, the reasons will also be recorded and discussed with the requesting party.

All personnel must undergo safeguarding training annually, either upon induction or by the 31st of January every year, for ongoing contracts. Certification will be required and evidence kept in accordance with GDPR regulations.

6. Reporting/Referral

All Personnel of AAEEK must take responsibility to be alert to signs and potential indicators of child abuse and neglect.

All safeguarding concerns (including but not limited to any allegations of child abuse or neglect by another member of staff, or any particular Personnel posing a risk of harm to children) should first be reported to the AAEEK's Designated Safeguarding Lead (DSL).

In the event that concerns/allegations are related to both the Designated Safeguarding Lead and the director, this should be reported directly to the local authority (Herefordshire) or NSPCC.

Any allegations of child abuse/neglect will be taken seriously and will be investigated and reviewed as soon as possible. During the investigation, we may:

- suspend any class until further notice; and
- suspend any facilitator until further notice;
- suspend any part of our services until further notice;
- contact any local authority, police, NSPCC or any other relevant agencies to report the incident (dependent upon the Local Authority the student resides in).

It is in everyone's interest to resolve cases as quickly as possible and is consistent with a fair and thorough investigation. Here at AAEEK, all allegations will be investigated as a priority to avoid any delay. The time taken to investigate and resolve individual cases depends on a variety of factors including the nature, seriousness and complexity of the allegation. Nevertheless, we seek to conclude our investigations and aim to resolve all cases within one

month (where possible). For those cases where it is clear immediately that the allegations are unsubstantiated or malicious, we aim to resolve this within one week; for complexed and exceptional cases our investigation may take longer than a month.

Upon the conclusion of our investigation, where a child has been harmed, is at risk of harm, or is in immediate danger, we will make a referral to either:

- the local authority; and/or
- local children's social care; and/or
- NSPCC; and/or
- the police.

We will generally inform parents or carers unless there are compelling reasons not to (if informing a parent or carer is going to put the child at additional risk).

In the event that we think an individual has engaged in conduct that harmed (or is likely to harm) a child or if a person otherwise poses a risk of harm to a child, we will make such referral to the DBS.

As the proprietor is also the Designated Safeguarding Lead, allegations pertaining to the proprietor should be forwarded to:

The Herefordshire LADO, Terry Pilliner who can be contacted as follows:

Email: LADO@herefordshire.gov.uk

or tpilliner@herefordshire.gov.uk

For more information

All Personnel should refer to the UK government's guide for practitioners which explains how to identify signs of abuse and what actions to take: What to do if you're worried a child is being abused: advice for practitioners

- <https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>

If you have any cause for concern, you should discuss your concerns with our Designated Safeguarding Lead or seek advice at any time from the NSPCC helpline – help@nspcc.org.uk or **0808 800 5000**.

All Personnel should be able to raise concerns about poor or unsafe practice and potential failures in AAEUK's safeguarding regime, and know that such concerns will be taken seriously by AAEUK's senior leadership team.

If you feel you are unable to raise an issue with AAEUK, or feel that your genuine concerns are not being addressed, help may be available to you

via: <https://www.gov.uk/whistleblowing> or <https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/whistleblowing-advice-line/>

Other available resources:

- Safeguarding and remote education during coronavirus (COVID-19) - <https://www.gov.uk/guidance/safeguarding-and-remote-education-during-coronavirus-covid-19>
- Undertaking remote teaching safely
- <https://learning.nspcc.org.uk/news/covid/undertaking-remote-teaching-safely>
- Keeping children safe in education
- <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>
- Working together to safeguard children
- <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>



- Child abuse concerns: guide for practitioners
- <https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>

Contact details:

Designated Safeguarding Lead: Debbie Gregg

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