

Safeguarding Policy

Key contacts

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Overview

Ultra Education's purpose is to support the welfare and success of children and young people through providing tutoring, mentoring and guidance as they move through their education around the world. As such, we believe that children and young people should never experience abuse of any kind and we recognise that we all 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.

Ultra Education has a commitment to equality at its core and we give equal priority to keeping all children and young people safe regardless of their age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation.

Ultra Education recognises that some children and young people are additionally vulnerable on account of the impact of discrimination, previous experiences, their level of dependency, or other needs.

Purpose and scope

The purpose of this policy statement is:

- to protect children and young people supported by Ultra Education's services from harm,
- to provide those working on behalf of Ultra Education with an understanding of the overarching principles that guide our approach to child protection.

This document introduces our approach to safeguarding, then sets out:

- what we try to do to safeguard children and young people in our care and,
- what actions should be taken if any adult suspects neglect or abuse, or have any other safeguarding concerns.

This policy applies to anyone working on behalf of Ultra Education, including directors, managers, mentors and tutors.

Legal framework

Ultra Education is based in London, UK and our safeguarding policy and procedures have regard to:

- *Working together to safeguard children (2018, revised 2022)*
- *Keeping children safe in education (2023)* (KCSIE)

Responsibilities

All those working on behalf of Ultra Education

All those working with Ultra Education must:

- be aware that safeguarding and promoting the welfare of children and young people is everyone's responsibility
- always act in the best interest of the child
- report any concern, however minor it may seem
- follow Ultra Education's policies and procedures.

The Safeguarding Lead (DSL)

The designated safeguarding lead is:

- responsible for all matters relating to safeguarding and to be the first point of contact and advice for all working on behalf of Ultra Education.
- the first port of call for any safeguarding concerns, allegations, questions or queries.
- responsible for keeping detailed, accurate records, including of any action taken.
- Responsible for monitoring the safer recruitment processes for tutors and mentors.

Definitions

Child

In England, a child is someone under the age of 18 whether living with their families, in state care, or living independently

Safeguarding

Safeguarding and promoting the welfare of children is defined in KCSIE as

- Protecting children from maltreatment
- Preventing harm to children's health or development
- Ensuring children grow up with the provision of safe and effective care
- Taking action to enable children to have the best outcomes

Abuse

A form of maltreatment of a child. Someone may abuse or neglect a child by inflicting harm or failure to prevent harm. Abuse can take place in the home, in school, online or in any other setting. Children may be abused by an adult or adults or by another child or children.

Recognising abuse

Suspicions or allegations of abuse may arise about:

- those working with Ultra Education,
- other children or young people on Ultra Education programmes (so-called peer-on-peer abuse)
- other people connected with the child.

Types of abuse

Physical Abuse

- hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing significant harm to a child.
- may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional and Psychological Abuse

- persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development
- may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.
- may include not giving the child opportunities to express his or her views, deliberately silencing them or 'making fun' of what they say or how they communicate
- may include exposing children to interactions that are very far beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.
- 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. It may feature age- or developmentally-inappropriate expectations being imposed on children.

Sexual Abuse

- 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.
- 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.
- may also include non-contact activities, such as involving children in looking at, or in 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.

Neglect

- 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.
- may include failure 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);
- ensure access to appropriate medical care or treatment.
- May also include neglect of, or unresponsiveness to, basic emotional needs.

Recognising signs of abuse

All those working on behalf of Ultra Education must be alert for the signs and indicators that children may be suffering abuse. Some common signs that there may be something concerning happening in a child's life include:

- unexplained or suspicious injuries such as bruising, cuts or burns
- unexplained changes in behaviour or personality
- becoming withdrawn
- seeming anxious
- becoming uncharacteristically aggressive, or other unexplained changes in behaviour
- lacks social skills and has few friends, if any
- being prevented from socialising with young people
- poor bond or relationship with a parent
- knowledge of adult issues inappropriate for their age
- unexpectedly missing appointments.

These signs don't necessarily mean that a child is being abused, there could be other things happening in their life which are affecting their behaviour – but we can help you to assess the situation.

You may also notice some concerning behaviour from adults who you know have children in their care, which makes you concerned for the child/children's safety and wellbeing.

If anyone working on behalf of Ultra Education has a safeguarding concern they should report it as soon as possible to the Safeguarding Lead.

Disclosures

Procedures for responding if a child or young person discloses safeguarding information

A disclosure may come from someone telling you:

- they have been or are being abused,
- they have concerns about someone else,
- they are themselves abusing or likely to abuse someone else.

DO:

- **Stay calm** and reassure
- **Listen carefully** and take what is being said seriously
- **Never promise confidentiality** as you need to act to keep them safe
- **Listen**, do not cross-question. Allow the child to speak without interruption. Accept what is being said – it is not your role to investigate or question.
- **Advise** that you will have to pass the information on. Explain you will speak to the safeguarding lead who will decide what to do.

Always:

- **Make a careful note of anything you were told or observe, date and sign your notes.**
- **seek advice from the Designated Safeguarding Lead (DSL) as soon as possible**

Reporting concerns

If

- a child or young person makes disclosure
- there is a suspicion that child or young person is suffering abuse
- the behaviour of an adult or child towards another child gives a cause for concern
- the actions or behaviour of a child or young person cause concern

then you **must** report these concerns to the Designated Safeguarding Lead. If you feel a child is in immediate danger then you must contact the **emergency services**.

Low-level concerns

A low-level concerns is one which does not meet the threshold for harm, but may cause a 'nagging doubt' that an adult may have acted in a way that is inconsistent with Ultra Education's policies and practices.

Examples of such behaviour could include, but are not limited to:

- being overly friendly with children
- inappropriately recording meetings or taking photographs
- engaging with communications outside of work, or unapproved electronic channels.

All those working on behalf of Ultra Education **must** raise any low-level concerns with the Designated Safeguarding Lead. These concerns will be recorded confidentially and acted on appropriately. Low-level concerns notified about third-party contractors will be notified to their employers.

If an adult working on behalf of Ultra Education has a concern that something they have done may be misinterpreted by a child, young person or adult then they should self-refer to the Designated Safeguarding Lead.

A robust and effective system for reporting and responding to low-level concerns will also protect those working on behalf of Ultra Education from being subject to false concerns or misunderstandings.

Working practices

Tutors and mentors working on behalf of Ultra Education must uphold the highest professional standards at all times. They are in a position of trust and must not abuse that trust or act in a way which may give the impression that they are doing so.

In particular they must not:

- communicate with students through un-approved channels including social media, private messaging or private email accounts,
- arrange to meet students socially, unless as part of a pre-existing familial relationship of which they must make Ultra Education aware,
- record or screenshot their online meetings unless done so for educational purposes with the agreement of Ultra Education and the student's parents.

Online tuition and mentoring via video call allows those working on behalf of Ultra Education to support young people across the world. When engaged in one-to-one online tutoring tutors and mentors must:

- ensure that all meetings are arranged by Ultra Education,
- behave at all times with the level of professionalism they would in a classroom in a formal educational setting,
- ensure the tone of calls is personable but formal, in line with that of a teacher in a school,
- make video calls from the most open and formal area possible, personal bedrooms are not appropriate,

Safer Recruitment

Ultra Education is committed to ensuring the best possible advice of the children and young people we support. Safeguarding and promoting the welfare of these children and young people is our highest priority.

Ultra Education aims to recruit staff that share and understand this commitment.

Those working with Ultra Education can be split into categories:

Red Category

Those undertaking regulated activity.

- Those involved in regular, unsupervised teaching, training or guidance for those under 18. Regular activities are defined in the DBS Regulated Activity Guidance[1] as more than 3 days in a 30 day period or or overnight between 2am and 6am with the opportunity for face-to-face contact with the children. This will include most mentors and tutors.
- Those working for Ultra Education who undertake the regular day to day management or supervision of individuals carrying out regulated activity with children.

Checks	
Registration form	✓
ID verification	✓
Right to work in the UK	✓
Current address	✓
Overseas residence declaration	✓
Self-disclosure of any criminal records relevant to role	✓

[1] https://assets.publishing.service.gov.uk/media/5ced4327e5274a4e97819cb4/Child_workforce_guide_v10_0_28052019.pdf (accessed 14/12/23)

DBS check – enhanced with barred check *or* Previous DBS registered on the update service *or* The applicant currently works in a school in the UK in a role which brings them into contact with children, and shows us the enhanced DBS certificate with barred check obtained through that school.	✓
1x reference from current or most recent employer	✓
Interview	✓
Confirmation that they have read all relevant policies	✓

Registration information and references always make use of relevant proformas.

Blue Category

- Agency or contract workers employed by a reputable third party with robust safeguarding procedures. If a third-party employee has not been subject to these processes then they will be treated as **red** category.

Ultra Education will seek a letter of assurance from the agency that their workers have been subject to safer recruitment checks appropriate to their role.

Version control

Version	Date	Description
1	16.xii.23	Initial version
1.1	19.vi.24	Updated with 3 month rule
1.2	23.iv.25	Updated the key contact of designated safeguarding lead
1.3	25.ix.26	Updated the key contact of designated safeguarding lead
1.4	11.x.26	Reference requirement changed to one, from current or most recent employer; clarified the DBS route for applicants currently working in a UK school