

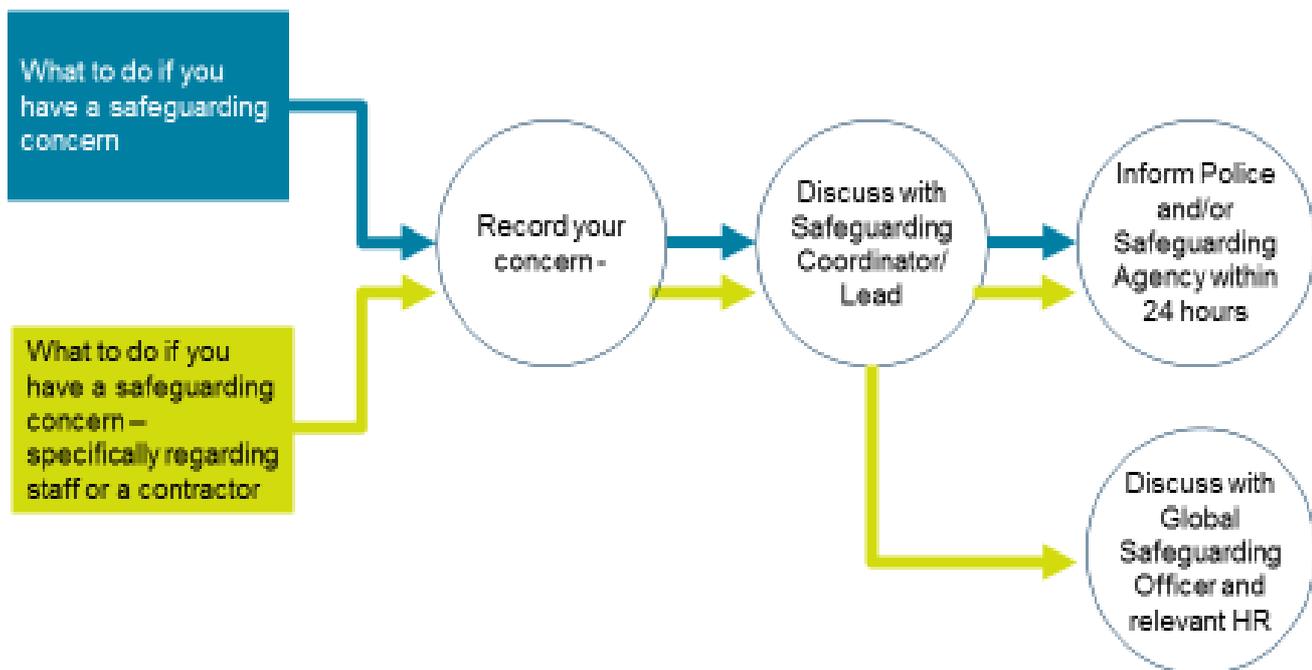


**Pearson**

**Safeguarding Learners  
(Concerns) Procedures**

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## Procedures if you have a safeguarding concern:

### 1. What to do about a concern that a child, young person or adult learner has been abused or harassed

This process applies to concerns that the learner may have been abused or harassed within their family, in their community, or in an online setting, including those not owned by Pearson.

These are the minimum requirements for all Pearson staff. Businesses may be subject to procedural requirements from state, national authorities and/or regulators. Where this is the case businesses should always comply with these and may need service specific procedures to evidence their compliance.

Any deviation for the Pearson Minimum Standards, state or national requirements should be documented and agreed by the relevant Executive Team member and the Global Safeguarding Officer.

- If you are concerned a child, young person or adult learner is suffering or likely to suffer abuse or harassment, you should speak to your Manager or the Safeguarding Coordinator of your business;
- If the learner is in immediate danger you should take appropriate action to address this, which could include calling the police, medical services or other appropriate agencies;
- If following discussion with your Safeguarding Coordinator or Manager, you are still concerned about the learner the Safeguarding Coordinator or the Manager will contact the safeguarding agency and/or the Police. This should take place within the working day that the concern is raised.
- You should consider whether you inform the students/parents of your concerns, before you contact the Police or a safeguarding agency. You should not contact the parents of the child or young person if to do so would put them at further risk of abuse. For example if the allegation is of sexual abuse within the family;
- You should make a record of your concerns, discussions and any decisions made about the learner as soon as you can, but no later than the end of the working day;
- When reporting any such concern you should ensure that the safeguarding agency or Police give you appropriate information about how they will proceed;
- Any referral to the Police or safeguarding agency should be followed up in writing within 24 hours;
- If following referral to a safeguarding agency or the Police you remain concerned you should

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report this to the Safeguarding Coordinator or your Manager, escalating your concerns either within Pearson and or with the Police or safeguarding agency; and

- It is your responsibility to raise all safeguarding concerns with your Safeguarding Coordinator or businesses manager. If, however, you feel that your safeguarding concerns are not being heard, or that the safeguarding concerns are about your Safeguarding Coordinator or business manager you can use EthicsPoint.com to raise your concerns anonymously and confidentially.

## **2. What to do about an allegation of abuse concerning a Pearson member of staff or a contractor**

- You should report all allegations or safeguarding concerns about a member of staff or a contractor immediately to your Manager or the Safeguarding Coordinator of your business;
- You should make a clear record of your concerns, as soon as possible, but not later than the end of the working day;
- The Safeguarding Coordinator or Manager should take action immediately to ensure that all learners are safe. Except in rare circumstances this should not include the removal or denial of a service to any learner;
- Where appropriate a referral will be made to the Police or safeguarding agency;
- The Safeguarding Coordinator or Manager along with the relevant HR Manager will consider whether a disciplinary investigation is needed;
- Disciplinary investigations should not hinder or compromise any Police or safeguarding agency enquiry;
- If the Police or safeguarding agency, do not proceed with the case a decision will still need to be made as to whether any disciplinary actions or actions to reduce risk to learners, are required;
- The relevant parents or guardians should be informed. This may include the parents or guardians of learners where there are no direct allegations of abuse. National laws and principles of confidentiality and data protection must be complied with, however, all parents will need to know, at the appropriate time, that concerns have been raised and that appropriate action has been taken. The Manager should take appropriate legal advice regarding these communications from Pearson's legal representatives. The Police and safeguarding agencies should be aware of any such communications;
- If following referral to a safeguarding agency or the Police you remain concerned you should consider, with the Safeguarding Coordinator or your Manager, escalating your concerns

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either within Pearson or with the Police or safeguarding agency; and

- It is your responsibility to raise all safeguarding concerns with your Safeguarding Coordinator or Manager. If, however, you feel that your safeguarding concerns are not being heard, or that the concerns are about the practice of your Safeguarding Coordinator or Manager you can use EthicsPoint.com to raise your concerns anonymously and confidentially.

### 3. What to do if you receive an allegation of past abuse

When someone makes a disclosure to any staff member or contractor, or they get information that indicates, that he or she suffered abuse as a child (at a business now owned by Pearson), you should:

- Report immediately to the safeguarding coordinator or manager of your business;
- Make a clear record of the concerns, as soon as you can, but by the end of the working day at the latest;
- Clarify whether there is any child or children who may currently be at risk from the alleged perpetrator;
- Ascertain whether the adult (who is alleging abuse) is aware of the alleged perpetrator's recent or current whereabouts and any contact the alleged perpetrator may have with children and young people;
- Advise the adult to make a formal complaint to the Police, explaining that there is a significant likelihood that a person who has previously abused a child will have continued and may still be doing so;
- Offer the adult support in making a formal complaint to the Police;
- Provide information about services that may be available to support them;
- If following referral to a safeguarding agency or the Police you remain concerned, you should consider with the Safeguarding Coordinator or your Manager, escalating your concerns either within Pearson or with the Police or safeguarding agency; and
- It is your responsibility to raise all safeguarding concerns with your Safeguarding Coordinator or manager.
- If, however, you feel that your safeguarding concerns are not being heard, or that the concerns are about the practice of your safeguarding coordinator or business manager you can use EthicsPoint.com to raise your concerns anonymously and confidentially.

Where it is believed that the alleged perpetrator has contact with a child a referral should be made

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to a safeguarding agency. So that information can be gathered and a decision can be made whether to apply child protection procedures in respect of the child or children with whom the alleged perpetrator has contact.

Where an adult making a disclosure chooses not to make a formal complaint to the Police, the adult should be advised of the possible risk to children. The adult should be advised that the information will be shared and a referral made to a safeguarding agency or the police. If the adult wishes for his/her identity to remain anonymous this must be respected, however, they should also be asked if they would be willing to talk with a representative of a safeguarding agency or the police to enable them to seek to safeguard any other child who may be at risk.

Where information is received that an adult may have suffered abuse in a service not connected to Pearson, the person making the allegation should be advised to contact the Police or a safeguarding agency.

#### **4. What to do if you are concerned that student has sexually abused/exhibited sexually harmful behaviour towards another child or young person**

##### **Definition**

Harmful sexual behaviours can include:

- Using sexually explicit words and phrases;
- Inappropriate touching;
- Using sexual violence or threats; and
- Full penetrative sex with a child or a young person.

Sexual behaviour between young people is considered harmful if, one child is older than the other. Particularly if the age gap is more than two years or one child is pre-pubescent.

Sexual behaviour can also be harmful where one child has power over another, even if they are the same age or younger. An example of this would be where the older child had a learning disability or particular vulnerability.

If you have any concerns ; you should;

- Report immediately to the Safeguarding Coordinator or Manager of your business
- Make a clear record of your concerns - it may be that your concerns have been growing over a period of time. Keeping a record of your concerns is a useful way to help you decide how to act;

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- Actions should be taken to ensure that all learners are safe, including the learner whose behaviour is of concern. This should not include the child/young person who is a victim of any alleged sexually harmful behaviour being moved from their class, residential unit or having to unreasonably change their routine in any way;
- The Safeguarding Coordinator or the Manager of the service should consider referring to a safeguarding agency and/or the Police;
- Parents should be informed of the concerns and agreement should be made as to how the concerns will be addressed;
- Where appropriate make a referral to the schools counsellor or external therapeutic support. This may include a health or non-government organisation resource;
- If following referral to a safeguarding agency or the Police you remain concerned, you should consider with the Safeguarding Coordinator or your Manager, escalating your concerns either within Pearson or with the Police or safeguarding agency; and
- It is your responsibility to raise all safeguarding concerns with your Safeguarding Coordinator or businesses manager. If, however, you feel that your safeguarding concerns are not being heard, or that the concerns are about the practice of your safeguarding coordinator or business manager you can use [EthicsPoint.com](https://www.ethicspoint.com) to raise your concerns anonymously and confidentially.

## Best practice guidance:

### 1. **There are other types of harm that children and young people can experience, these include sexual exploitation, bullying (including online), young people abused by gang activities and self-harm or suicide**

- If you are concerned about any of these you should speak to the Safeguarding Coordinator or manager of your business, they will consider the need to make a referral to a safeguarding agency or the Police;
- Make a clear record of your concerns, as soon as you can, but at the latest before the end of the working day;
- Where the child or young person is in immediate danger, you should call the police, relevant safeguarding agency or medical service;
- Where there is a possibility of a criminal offence a referral to the police should be made, via the Safeguarding Coordinator or the Manager;
- Discuss with your Safeguarding Coordinator and/or business manager what actions need to be taken to address the risk or harm to the child or young person;
- These discussions should always include when and how the parents or guardian of the child/young person is to be informed of the concerns;
- Where there is a need for advice about any of these forms of abuse, you should consult the Global Safeguarding Officer; and
- If following referral to a safeguarding agency or the Police you remain concerned, you should consider with the Safeguarding Coordinator or your manager, escalating your concerns either within Pearson or with the Police or safeguarding agency.

### 2. **Photography and Videos and other imaging of children and young people**

Working with children and young people may involve the taking or recording of images. Any such work should take place with due regard to the law and the need to safeguard the privacy, dignity, safety and wellbeing of children and young people.

You should ensure that there is;

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- Informed written consent from parents or guardians and agreement, where possible, from the child or young person;
- Careful consideration should be given as to how activities involving the taking of images are organised and undertaken;
- Care taken to ensure that all parties understand the implications of the image being taken especially if it is to be used for any publicity purposes or published in the media, or on the Internet;
- An agreement, with relevant parties, as to whether the images will be destroyed or retained for further use, where they will be stored and who will have access to them;
- Due consideration given to any child who appears uncomfortable, for whatever reason, and that the potential for such activities to raise concern or lead to misunderstandings is recognized; and
- No image of a child or young person taken by a member of staff or contractor should be used for their own personal use.

**It is recommended that when using a photograph the following guidance should be followed:**

- If the photograph is used for publicity or in the media in any way, try to avoid naming the pupil;
- If the pupil is named, avoid using their photograph;
- Businesses should establish whether the image will be retained for future use;
- Images should be securely stored and used only by those authorised to do so;
- The child/young person should understand why the images are being taken, have agreed to the activity and be appropriately dressed;
- Only use equipment provided or authorised by the services; and
- Report any concerns about any inappropriate or intrusive photographs found to the Safeguarding Coordinator or Manager.
- Always ensure you have parental permission to take and/or display photographs .This means that staff or contractors should not:
  - Display or distribute images of children and young people unless they have consent to do so from parents or guardian;
  - Use images which may cause distress;

- Use mobile telephones or any other similar devices to take images of children; and
- Take images 'in secret', or taking images in situations that may be construed as being secretive.

### 3. Technology and use of the internet

Staff should actively promote the safe use of the internet by:

- Talking to children and young people about their day to day use of new technologies; and,
- Encouraging them to use and develop the skills known to increase resilience in regards to internet use.

Where a service provides the learner with internet access:

- The service should ensure that they have the appropriate blocks and filters for any access to the internet from the service. This will include access to any WiFi systems used by the service;
- Only management authorised users, for legitimate business reasons, should contact learners via Pearson approved social media forums and only on Pearson owned devices;
- Where other technologies are used by the service, such as social networking, a risk assessment should be carried out and appropriate safeguards put in place;
- All learners and their parents or guardians must sign an acceptable new technology use agreement with the service;
- All learners are given a unique log in password and are made aware of the dangers of sharing this with others; and
- Where it is not possible for learners to have a unique log in password, a clear record is made of who has accessed the internet and when.

### 4. Recruitment and selection

The recruitment of all staff and contractors who have face to face contact with learners should (where national laws permit) be compliant with the following standards.

- The job description makes reference to the responsibility for safeguarding and promoting the welfare of learners;

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- The job description includes reference to suitability to work with children;
- Those interviewing should look at all information from applicants and identify and satisfactorily resolve any discrepancies or anomalies in the information;
- Those interviewing should obtain independent professional and character references that answer specific questions to help assess an applicant suitability to work with children, young people or vulnerable adults;
- There should be a face-to-face interview that explores the candidate's suitability to work with learners as well as his or her suitability for the position (this would include questions that test the candidates empathy towards children and young people);
- The identity of the successful applicant should be verified;
- The successful applicant's academic or vocational qualifications should be verified;
- The applicant's previous employment history and experience should be checked; and
- Where possible obtain disclosure and criminal record checks regarding the applicants.

At least one person on the interview panel should have received training in safer recruitment and selection.

Each school or business must capture information and have that readily available, on all staff and contractors, on the following data set;

- Identity
- Qualifications
- Disclosure checks

There should be a record of both the details and the evidence of each of these, with the dates of the checks and verifications as to when they were carried out.

## 5. Safe working practice

All staff and contractors are responsible for their own actions and behaviour, they should avoid any conduct which would lead any reasonable person to question their motivation and intentions. No visitor to Pearson premises should be permitted unsupervised contact with children or vulnerable adults.

All staff and contractors should:

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- Work in an open and transparent way;
- Where possible don't work in isolation;
- Discuss and/or take advice from the Safeguarding Coordinator or the Manager of your business over any incident which may give rise to concern;
- Record any incident or decisions made;
- Apply the same professional standards regardless of gender, race, disability, sexuality or any other characteristic ;
- Be aware of the relevant laws and practice on confidentiality and data privacy; and
- Be aware that breaches of the law and other professional guidelines could result in criminal or disciplinary action being taken against them.

## 6. Face to face contact

- We should ensure that parental or other family contact details are held in event of an emergency as well as the telephone numbers and other contact details of any third-party agencies likely to be required to help or be informed about relevant incidents which might arise in the context of this policy;
- Where rules on medical confidentiality allow, we should ask and document where a student is on medication;
- We should ensure that students in our care should have access to advice on personal safety. This includes travel to countries where there is a high risk of crime; and
- We will never permit the carrying of arms or weapons on any Pearson premises unless they form part of approved training.

Staff, or contractors having unsupervised face to face contact with learners when they have not been suitably vetted and trained should be avoided wherever possible.

Where the safety of learners or the viability of the service would be compromised by not using staff who are not suitably vetted, this is risk assessed and agreed by the Managing Director of the business. This should be a time limited arrangement and not a long term solution.

### **Code of appropriate & inappropriate standards of behaviour**

Staff should:

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- Provide a positive and enabling environment for students' personal, physical, social, emotional, moral and intellectual development;
- Declare their personal relationships with any service user if they begin to attend the place of work of the member of staff;
- Encourage and respect students' voices and views;
- Be inclusive and involve all learners without selection or exclusion on the basis of gender, disability, ethnicity, sexuality, religion or any other status, as local law and custom allows;
- Develop special measures/supervision to protect younger and especially vulnerable children from peer and adult abuse;
- Avoid placing yourself in a compromising or vulnerable position when meeting with learners (e.g. being alone with a child in any circumstances which might potentially be questioned by others);
- If a face to face meeting is required this should normally be on Pearson's or other designated premises or, if that is not appropriate or possible, the meeting should be arranged in a central, well lit, public location with other people present;
- If the meeting cannot be on Pearson premises, this should be agreed with the relevant Manager and recorded;
- Immediately report the circumstances of any situation which occurs which may be subject to misinterpretation to your Safeguarding Coordinator or Manager.
- Ensure any planned social contact with learners is approved by senior colleagues;
- Advise Senior Management of any regular social contact they have with a learner;
- Report and record any situation, which you feel, might compromise their professional credibility;
- Be aware that even well intentioned physical contact may be misconstrued by the learner, an observer or by anyone to whom this action is described;
- Staff should not touch a learner in a way which may be considered indecent;
- Always be prepared to explain actions and accept that all physical contact be open to scrutiny;
- Staff should not indulge in horseplay, tickling or fun fights;

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- Avoid meetings with learners in remote or secluded areas;
- Ensure there is visual access and/or an open door in one to one situations;
- Inform other staff of the meeting beforehand, assessing the need to have them present or close by; and
- Avoid use of 'engaged' or do not disturb signs when meeting with learners.

Staff should not:

- Hit or otherwise physically assault anyone;
- Use language that will mentally or emotionally abuse, or cause mental or emotional abuse;
- Act in any way that intends to embarrass, shame, humiliate, or degrade;
- Show discrimination on the grounds of race, culture, age, gender, disability, religion, sexuality, political persuasion or any other status;
- Develop a sexual relationship with a learner or encourage an inappropriate attachment;
- Kiss, hug, fondle, rub, touch or exhibit any form of sexualized behaviour in an inappropriate or culturally insensitive way;
- Do things of a personal nature that could be done unaided by the individual including dressing, bathing and grooming;
- Initiate physical contact e.g. holding hands, but it is permissible to respond in an appropriate way to a distressed student;
- Suggest or encourage inappropriate behaviour or relations of any kind;
- Allow children to engage in sexually provocative games with each other;
- Stand aside when they see inappropriate or bullying actions inflicted on others;
- Make sexual remarks to a learner (including email, text messages, phone or letter);
- Discuss their own sexual relationships with, or in the presence of, learners;
- Discuss a learner's sexual relationships in inappropriate settings or contexts;

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- Enter into or encourage inappropriate or offensive discussion about sexual activity;
- Make (or encourage others to make) unprofessional personal comments which scapegoat, demean or humiliate, or might be interpreted as such; and
- Under any circumstances should staff use Pearson equipment to access inappropriate or indecent material.

## 7. Training and organisational learning

Safeguarding training is mandatory for all staff who have direct contact with learners or who deliver online service with direct contact with learners.

Reference to safeguarding should form part of induction training for all Pearson staff.

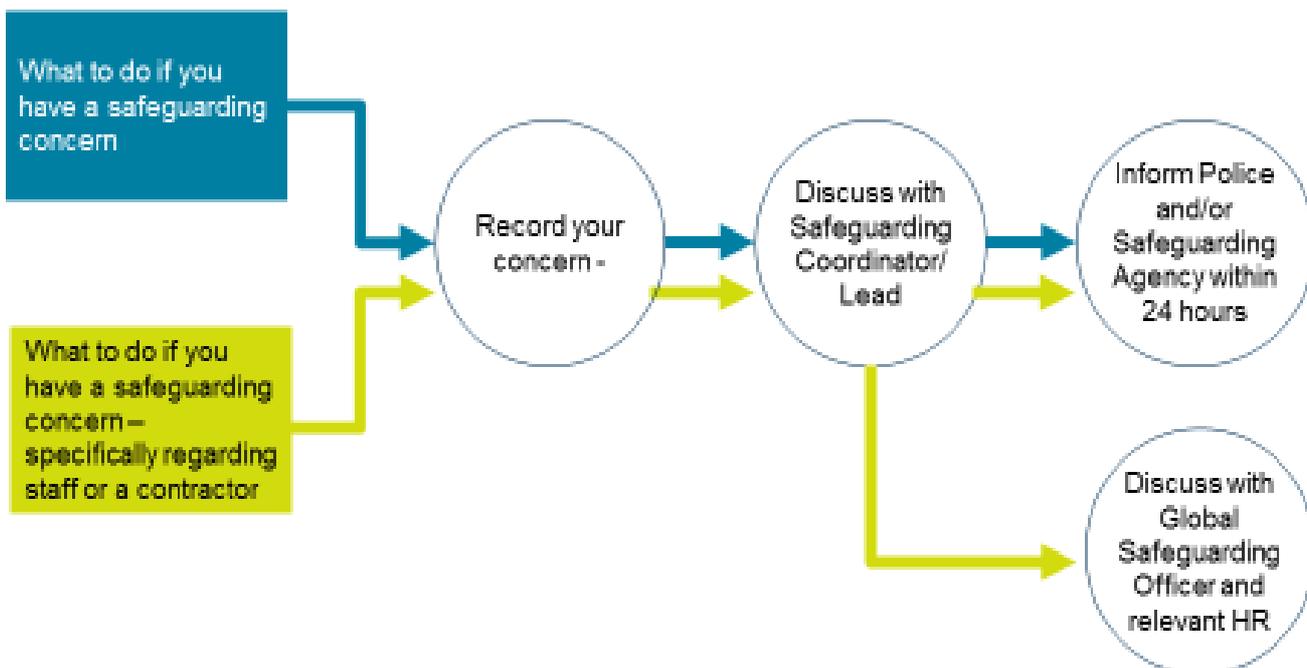
Where a serious safeguarding incident takes place or a series of events that indicate learning, the country Managing Director and the Global Safeguarding Officer will decide whether there is a need to commission and independent inquiry.

All staff and contractors with face to face contact with children and young people, who read the Safeguarding Policy and procedure as part of their induction.

Each year, it is mandatory for all workers to confirm compliance with the rights enshrined in this Policy to equality of protection and freedom from abuse as part of the Code of Conduct certification.

## Appendix A

### What to do if you are concerned about a learner



## Appendix B

### Scope of this Procedure

The scope of this procedure is global. Its focus is on activities which involve employees or contractors from Pearson businesses coming into direct contact with students whether face to face or online. For example, the scope covers individuals who hold roles that involve visits to schools or training

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centres as well as teachers or lecturers that work in Pearson businesses active in the direct delivery of education through the operation of schools, universities, testing centres or English language centres. We do this through companies we own as well as working with and through partners such as charitable trusts, franchise and licence partners and other organisations.

This Procedure applies and extends to all situations regardless of legal form where Pearson or its brands could be reasonably considered to have operational control. This means we have responsibility for ensuring that **all workers in all parties** relevant to the business activity comply with this policy.

Workers therefore includes people who work directly for Pearson, contractors and employees of business partner organisations including franchise and licence partners.

The types of activities we are involved in that relate to students vary. They include teaching, training, instruction, care and supervision. **All these activities, not just teaching**, are included in the scope of the policy.