

# Safeguarding Policy

## I. Introduction

At GoStudent, the safety and well-being of our students, tutors, and staff members are paramount. We aim to be the no. 1 global school and, in doing so, we recognize the importance of protecting everyone who interacts on our platform from any form of harm, abuse, or exploitation. We are committed to providing a safe, respectful, and supportive environment where effective learning and tutoring can take place and make sure that all individuals who use our platform are aware of the need to safeguard children and their responsibilities in identifying and reporting possible cases of abuse.

This Safeguarding Policy ("**Safeguarding Policy**") serves as a comprehensive guide outlining our approach to safeguarding, the responsibilities of various stakeholders, and the protocols to follow when concerns arise. We have developed this Safeguarding Policy in accordance with national and international laws and guidelines on safeguarding and child protection, as well as best practices for online platforms.

Please read this Safeguarding Policy carefully and consult it regularly to ensure that you are familiar with its contents. Together, we can create a safe online learning environment for everyone involved.

## II. Scope and Definitions

This Safeguarding Policy applies to all individuals who interact with or through the GoStudent's platform ("**Platform**"), regardless of their role or location. This includes but is not limited to:

- Self-employed tutors who provide online tutoring services via the Platform ("**Tutors**");
- Individuals who engage in tutoring sessions via the Platform ("**Students**");
- Adults, including but not limited to parents, who hold legal responsibility for the welfare and decision-making related to Students ("**Guardians**");
- Employees of GoStudent ("**Staff Members**");
- Specially trained GoStudent Safety Officers, who manage any inbound concern related to safeguarding on the Platform ("**Safety Officers**").

### III. Safeguarding Principles

Our commitment to safeguarding is guided by the following key principles:

- **Comprehensive Safeguarding Framework:** We maintain a robust Safeguarding Policy and set of procedures specifically aimed at the safeguarding of individuals (especially Tutors and Students). To ensure that the Safeguarding Policy remains in line with current legislation, guidelines, and best practices, this Safeguarding Policy will be reviewed at least annually.
- **Zero Tolerance:** We operate under a strict zero-tolerance policy for any form of inappropriate behavior, be it from Tutors, Students, Guardians or Staff Members. This includes, but is not limited to, harassment, bullying, abuse, neglect, and discrimination.
- **Rigorous Tutor Selection:** We apply strict selection processes for Tutors, incorporating background checks, interviews, and other vetting mechanisms to ensure that Tutors are qualified and suitable for working with Students.
- **Safety Center & Safety Officers:** We have designated Safety Officers who are specially trained to oversee all matters related to safeguarding on the Platform. We ensure that they are regularly trained and kept updated on our Safeguarding Policy and procedures.
- **Reporting Mechanisms:** Tutors, Staff Members, Students and Guardians are provided with clear guidelines on how to report and handle any concerns related to safeguarding. This ensures that in the event of any safeguarding issue, appropriate and rapid action can be taken to minimize risk or harm to affected individuals.

### IV. Safeguarding Procedure

Concerns related to safeguarding in general and especially in regard to child and adult safety can manifest in a variety of ways, including but not limited to observations, disclosures, or direct reports. It is critical to understand that abuse can also occur online and may encompass multiple forms of maltreatment, such as verbal, physical, or emotional abuse, as well as exploitation.

#### 1. Misconduct by a Tutor

To qualify for tutoring on our Platform, Tutors must meet specific legal criteria and be deemed suitable to work with Students. We require all Tutors to provide a valid background check upon entering our Platform. Given that requirements may differ based on local laws and regulations, we individually inform Tutors about

market-specific requirements upon their entry on the Platform. Additionally, Tutors must successfully pass subject-specific tests and participate in either a group interview or submit an introduction video of themselves, with the camera enabled throughout the process. All accepted Tutors are required to complete an onboarding training program and must adhere strictly to our [\*\*Tutor Code of Conduct\*\*](#).

Through our rigorous selection process, we aim to proactively minimize the risk of any safeguarding incidents. However, if despite all precautions a safeguarding incident does occur, it is crucial to strictly follow the established procedures.

The Guardian has primary responsibility for the welfare and safety of the Student and should be readily available during tutoring sessions to deal with any concerns or incidents reported by the Student. Should a Tutor violate our Tutor Code of Conduct in any way — whether it is through the use of inappropriate language, sharing of unsuitable content or images, unauthorized disclosure of sensitive information, making unsolicited contact outside designated communication channels like the Platform, GoClass, or GoChat, particularly if such contact is unrelated to tutoring, or engaging in any form of sexual misconduct — it is essential to adhere to the following prescribed procedures.

Based on the gravity of the misconduct, the following steps are recommended, though not necessarily in this order, and not all steps may be required:

1. Students who experience any inappropriate behavior from a Tutor should immediately inform their Guardian, who can then decide on further actions.
2. Terminate the tutoring session right away, if the incident is happening during a session.
3. Report the incident directly to the Safety Officer via our Safety Centre on the Platform or by emailing [\*\*safeguarding@gostudent.org\*\*](mailto:safeguarding@gostudent.org). For detailed guidelines on how to report an incident, please refer to Section IV.4.
4. If necessary, contact the police and/or competent local authorities.
5. Discontinue any further interaction with the Tutor implicated in the incident. Additionally, any unsolicited contact from the Tutor after the event should be reported to the Safety Officer without delay.

## **2. Misconduct by a Student**

All Students are obligated to strictly adhere to our [\*\*Student Code of Conduct\*\*](#). Tutors should familiarize themselves with the Student Code of Conduct too.

If a Student fails to adhere to the Student Code of Conduct and the Tutor encounters any form of inappropriate behavior by a Student or other persons involved — whether it is through the use of inappropriate language, sharing of unsuitable content or images, unauthorized disclosure of sensitive information, making unsolicited contact outside designated communication channels like the Platform, GoClass, or GoChat, particularly if such contact is unrelated to tutoring,

or engaging in any form of sexual misconduct — it is essential to adhere to the following prescribed procedures.

Based on the gravity of the misconduct, the following steps are recommended, though not necessarily in this order, and not all steps may be required:

1. Tutors who experience any inappropriate behavior from a Student or other persons involved should request to stop that behavior in a polite manner.
2. Terminate the tutoring session right away, if the incident is happening during a session.
3. Report the incident directly to the Safety Officer via our Safety Center on the Platform or by emailing [safeguarding@gostudent.org](mailto:safeguarding@gostudent.org). For detailed guidelines on how to report an incident, please refer to Section IV.4.
4. If necessary, contact the police and/or competent local authorities.
5. Discontinue any further interaction with the Student implicated in the incident. Additionally, any unsolicited contact from the Student/Guardian after the event should be reported to the Safety Officer without delay.

### **3. Misconduct Witnessed by Tutor or Disclosed to a Tutor by a Student**

If a Tutor either observes a situation or receives information suggesting that a Student is at risk of harm, it is crucial to take immediate action. Should the Tutor witness abuse or believe that the Student is in immediate danger, contacting the police and/or competent local authorities right away is essential, followed by a report to the Safety Officer. For detailed guidelines on how to report an incident, please refer to Section IV.4.

Until further direction from the Safety Officer, the Tutor should refrain from additional contact with the Student or any other individuals involved, unless avoiding contact could further jeopardize the Student's well-being.

For Tutors handling sensitive conversations where a Student discloses safeguarding issues, please adhere to the following guidelines:

1. **Be Attentive and Encouraging:** Provide your complete attention without making promises of confidentiality. Maintain a neutral and supportive demeanor during the disclosure.
2. **Allow Space and Time:** Do not interrupt or rush the Student and be prepared for the possibility of multiple conversations.
3. **Documentation:** Confirm your understanding of the Student's account, and promptly document detailed and accurate records. Share these with the Safety Officer immediately. For detailed guidelines on how to report an incident, please refer to Section IV.4.
4. **Reassurance:** Assure the Student that coming forward was the right action, emphasizing that they are not at fault for the abuse.

**Should the Tutor require support due to the emotional or psychological impact of the situation, they are also encouraged to reach out to the Safety Officer for assistance.**

#### **4. Reporting an Incident**

The obligation to report any incident for the purpose of safeguarding rests on everyone involved. Every submitted incident undergoes a thorough investigation, followed by appropriate actions. Thus, it is crucial for all Staff Members, Tutors, Students and/or Guardians to be aware of how to report any concerns they may have.

While it is impractical to provide an exhaustive list of every possible scenario that may arise, GoStudent's protocol is clear: **All reported incidents will be thoroughly investigated, followed by appropriate actions.**

**The reporting steps are as follows:**

1. If you have any concerns, it is essential to report them without delay to GoStudent. You can do this via our **Safety Centre** on the Platform or by emailing our Safety Officer at [safeguarding@gostudent.org](mailto:safeguarding@gostudent.org). This ensures that safeguarding incidents are directly and swiftly brought to the attention of the Safety Officer. This reporting feature is powered by MYCONCERN®, a secure and trusted safeguarding software used globally by educational institutions and organizations.
2. When submitting a report, please provide as much specific and detailed information as possible about the incident. This should include details such as the names and ages of involved individuals, a comprehensive account of the actions or statements that raised concerns, and any information that the affected individual has disclosed about the alleged perpetrator.
3. Upon receiving the report, our Safety Officer will immediately initiate an internal review. They will engage with all parties involved (provided that doing so is in the best interest of the Student) to gather additional information and context regarding the reported concern.
4. Based on the gathered information, the Safety Officer will determine the most appropriate course of action. This can vary from resolving the matter internally by suspending or removing individuals from the Platform to consultation and/or reporting to police and/or the competent local authorities.
5. If an emergency arises — such as imminent danger or immediate medical needs of an individual — your first priority should be to contact official emergency services, followed by reporting the incident to the Safety Officer as soon as possible. **For urgent assistance outside of regular business hours,**

**please reach out to local authorities and/or competent external organizations (contact information is available in our Safety Center).**

6. For any additional questions or to obtain more details please contact us via [safeguarding@gostudent.org](mailto:safeguarding@gostudent.org).

## **V. Data Protection**

The well-being of everyone who interacts through our Platform is of utmost importance to GoStudent. Should we have concerns that an individual is experiencing harm or is at risk, we are committed to sharing this information with appropriate statutory agencies. While we aim to always obtain Guardian consent before sharing any information, there may be exceptional circumstances where obtaining consent could e.g. further endanger the Student. In such cases, we will proceed with sharing information if it is deemed necessary and serves the Student's best interests. This is not affected by the Data Protection Act (2018) or the General Data Protection Regulation (GDPR).

The Safety Officer will document the rationale behind each decision, the actions taken, and the outcomes, including efforts made to secure consent and any reasons given for not obtaining it.