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Safeguarding Policy

All safeguarding policies should be read in conjunction with the relevant LSCB guidelines and procedures for specific VLUK site.

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1. Introduction

Virtual Learning UK (VLUK) has a responsibility to protect and safeguard the welfare of children and young people they come into contact with. The need for guidelines and procedures is important to ensure that this is done with understanding and clarity.

The person with lead responsibility for safeguarding within the organisation is: Neil Ouldrige, Head of Study Programmes

The following is based on LSCB guidelines. The Local Safeguarding Children Board (LSCB) is the key statutory mechanism for agreeing how relevant organisations will cooperate to safeguard and promote the welfare of children and ensure the effectiveness of what they do.

This document is an overview of safeguarding work at VLUK. In the case of any serious incident VLUK sites should always make reference to formal LSCB guidance. Procedures can be accessed through the vast websites and LSCBs that cover VLUK sites across the UK.

['Working Together to Safeguard Children 2018'](#)

The Directors are expected to monitor policy and procedure through the LSCB safeguarding audit and return the audit to the Local Authority annually.

There are many areas of potential overlap with a range of other policies which are referenced throughout.

2. Safeguarding arrangements

According to Working Together 2018 there are two key principles that underpin safeguarding:

- Safeguarding is everyone's responsibility
- A Child – Centred Approach

Section 175 of the Education Act 2002 places a duty on local authorities (in relation to their education functions and governing bodies of maintained schools and further education institutions, which includes sixth-form colleges) to exercise their functions with a view to safeguarding and promoting the welfare of children who are pupils at a school, or who are students under 18 years of age attending further education institutions. The same duty applies to independent schools (which include Academies and free schools) by virtue of regulations made under section 157 of the same Act.

In order to fulfil their duty under sections 157 and 175 of the Education Act 2002, all educational settings to whom the duty applies should have in place arrangements to develop and improve their practice and the practice of others. In addition, schools should

have regard to specific guidance given by the Secretary of State under sections 157 and 175 of the Education Act 2002 namely, Safeguarding Children and Safer Recruitment in Education and Dealing with allegations of abuse against teachers and other staff.

3. Awareness and Prevention

3.1 The government has published a policy (Keeping Children Safe in Education September 2019), in which guidance commences on 2nd September 2019. This policy has been used in formulating VLUK's safeguarding statement.

3.2 The definition of Safeguarding Children that VLUK and Education Funding Partners' (EFP) work to is:

- Protecting children from maltreatment
- Preventing impairment of children's health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes. (Working Together to Safeguard Children 2018, pages 6/7)

This definition covers the full spectrum of safeguarding:

- Universal safeguarding – Working to keep all children and young people safe and create safe environments for all children.
- Targeted safeguarding – Some groups of children are more at risk than others, and it is important to target policies and services to these groups, to help keep them safe from harm i.e. children with additional needs or children in need.
- Responsive safeguarding – Unfortunately, no matter what we do, there will always be some children and young people who suffer harm. We need to respond quickly and appropriately when this happens – supporting children and dealing with those who harm them i.e. children in need of protection.

Virtual Learning UK also works within a child protection system. Child protection is a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering or who are likely to suffer significant harm. (Working Together to Safeguard Children 2018, Virtual Learning UK Child Protection Policy).

All staff and volunteers are provided with the child protection policy and the process for reporting concerns. Staff should ensure they read this policy in conjunction with safeguarding policy.

3.3 VLUK fully recognises its responsibilities for safeguarding and promoting the health and well-being of all the children in its care. Our Designated Safeguarding lead for VLUK is Neil Ouldrige (Head of Study Programmes).

We therefore strive to:

- Ensure we practice safer recruitment in compliance with the LSCB Standards for Safer Recruitment 2017 and Keeping Children Safe in Education 2019.

- Raise awareness of safeguarding issues and equip children with the skills needed to keep them safe.
- Implement LSCB procedures for identifying and reporting cases, or suspected cases, of abuse.
- Support children who have been abused in accordance with the LSCB procedures.
- Establish a safe environment in which children can learn and develop.
- Ensure that all staff receive appropriate safeguarding training in compliance with general LSCB Training Strategy.
- Ensure Early Help Process is completed to support children.
- Establish and maintain an environment where children feel secure, are encouraged to talk and are listened to.
- Ensure children know that there are adults in the school whom they can approach if they are worried.

4. Support for students who may have suffered abuse or neglect

We are aware that children who are significantly harmed or at risk of significant harm, or who witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame. The VLUK Study Programme may be the only stable, secure and predictable element in the lives of children at risk. When at their study programme site their behaviour may be challenging and defiant or they may be withdrawn. VLUK and the EFPs will endeavour to support children through:

- The content of the curriculum.
- Supporting the appropriate assessment of their needs.
- The VLUK/site ethos, which promotes a positive, supportive and secure environment and gives children a sense of being valued.
- The VLUK behaviour policy, which is aimed at supporting vulnerable children on the study programmes. VLUK will ensure that the child knows that some behaviour is unacceptable but they are valued and not blamed for any harm, which has occurred.
- VLUK Anti- Bullying Policy/ Emotional Health and Wellbeing Policy is also aimed at protecting vulnerable pupils who may have been victims of abuse.
- Liaison with other agencies that support the child such as Children's Services, Child and Adolescent Mental Health Service, Education Welfare Service and Educational Psychology Service.

5. Health and Safety

VLUK has a Health and Safety Policy, which is monitored each term by the Operations Officer and Directors

A copy of this policy can be viewed on request.

The Operations Officer, the member of staff with responsibility for Health and Safety (Neil Ouldrige) and the Directors with responsibility for Health and Safety oversee this comprehensive list. Any concerns from staff are reported to any of the above and the site supervisor carries out an initial examination, assessing what remedial action needs to take place.

Each term there is a minimum of one fire drill that practices efficient evacuation from the buildings. Each site conducts an annual Fire Risk Assessment. Each site also provides a critical incident plan that details what staff and parents should do in the case of emergencies.

Risk Assessments are undertaken for activities, visits, alternative provision, off site activities and trips.

6. First Aid

At all VLUK sites there are trained members of staff who oversee first aid. There are first aid kits situated at each site.

When a child is poorly, or has suffered an accident on site there is a protocol for staff to follow:

- A person trained in first aid is consulted
- The incident is logged in the accident book on Google Drive
- For head injuries a note to parents/carers is issued
- If there is any doubt at all a parent/carer is contacted
- In the case of serious accidents/injuries emergency ambulance services will be called

or matters of an intimate nature, staff are expected to deal with a child with utmost sensitivity and always to seek guidance from the Head of Study Programmes. In almost all situations the parents will be asked to come into the site immediately so that they are part of the decision-making process for such matters. In rare circumstances the appropriate emergency services will be contacted as a matter of urgency before the parent.

7. Site Security

7.1 All VLUK study programme sites provides a secure site, which is controlled by precise management directives to which everyone on site must adhere. Laxity can cause potential problems to safeguarding. Therefore:

- Doors should be closed to prevent intrusion but to facilitate smooth exit.
- Visitors and volunteers must only enter through the nominated main entrance and after signing in.
- Students will only be allowed home with adults who have parental responsibility or confirmed permission.
- Empty classrooms should have windows that are closed.

7.2 In the event that a child leaves the learning environment/study programme premises without permission staff should not chase after a child, but rather to report immediately to the Site Leader. Then parents will be informed of the circumstances. The incident should be logged in the incident book

8. Attendance

8.1 Excellent attendance is expected of all students. Absence from the Study Programme can be an indicator of a safeguarding issue so close monitoring and vigilance is needed from all staff. For details on how to report a safeguarding concern refer to the Child Protection Policy.

When children are unwell parents are expected to confirm absence by telephone or email immediately. If there is no notification school has a policy of phoning or emailing home to ascertain each child's whereabouts. For specific information and guidance about the school's attendance protocols and procedures please see the attendance policy.

8.2 Attendance rates are collated each term and reported termly to the government, and to all parents. Positive measures are in place to encourage children to attend regularly and punctually and the EFP and VLUK has a duty to report such issues to the relevant Local Authority and the Local Authority has a duty to consider investigating the issues and, in some cases, to instigate legal action.

8.3 Children Missing from School:

The Education and Inspectors Act 2006 places a duty on Local Authorities to establish the identities of children missing from education in their area. The school must comply with the relevant LSCB Missing Children procedures. The school will explore why children are not in school and report as per the LSCB procedure to the Education Welfare Service.

Relevant staff will be trained on understanding the additional vulnerabilities that missing children may have. Each relevant Local Authority has a 'The Local Authority Children Missing in Education Policy'. As such VLUK and the EFPs should refer to this policy prior to removing any child from a school roll and should endeavour to ascertain the whereabouts of a child prior to this removal. Unless the school is satisfied that a child has immediately gone on roll of another school or education programme (in or out of county), a children missing education referral form should be completed and forwarded to the relevant Education Welfare Service for investigation. Current legislation is in place to identify when a child may or may not be removed from roll."

9. Safer Recruitment including Staff Conduct

9.1 Appointments of staff and induction of newly appointed staff and work placements. All staff appointed to schools will be in compliance with Keeping Children Safe in Education (2019) and will operate within the relevant LSCB Standards for Safer Recruitment Procedures. People working and volunteering in schools are required by law to have a Disclosure and Barring Service (DBS) check at the enhanced level. This will provide any information to the registered body/Local Authority on any convictions, cautions or other police information relevant to the work. The Local Authority will consider the relevance of information on the DBS clearance and may seek further information in line with the Safer Recruitment Policy if there is a cause for concern. Where there is evidence to suggest a risk to working with children a decision will be taken by the Local Authority in consultation with the Educational Funding Partner/VLUK Directors as to whether to progress the appointment or not.

9.2 At least one member of the recruitment panel will have completed the accredited Safer Recruitment training. This can be accredited through a Local Authority one-day training course and the half day refresher course or the National College for School Leadership (NCSL) accredited train the trainer two-day course.

9.3 All new staff at VLUK will receive an induction programme including safeguarding children. New VLUK staff will also undergo Level 2 Child Protection Awareness training. Training can be accessed from a EFP or delivered in house.

9.4 All staff will receive, read and adhere to the Code of Conduct policy and act safely and appropriately towards all children.

10. Volunteers/Visitors

10.1 Induction of volunteers:

For extended contact with children, when children may be left alone with an adult, or when an adult visitor may be in and around the study programme site or facility, VLUK initiates an enhanced DBS search. Visitors, who do not yet have clearance, will under no circumstances be left alone with a child or group of children.

10.2 Welcoming visitors:

It is the responsibility of the employing statutory agency of the professional personnel visiting VLUK sites to ensure that their staff have appropriate and up to date DBS checks in place. VLUK will assume that these appropriate DBS checks are in place but can request confirmation of staff identity and DBS clearance at any time should they deem it necessary. All professional personnel visiting VLUK sites will have appropriate identity, which they must produce upon visiting the VLUK site. The Site Leader or Tutor will check the identity of staff before admittance into the learning facility and all visitors will be expected to sign in. People undertaking work on site who may not have a DBS check, as it is not pertinent to their employment, will not have unaccompanied access to children. All other visitors to the site will be accompanied at all times by staff involved with the study programme.

10.2 All VLUK staff and other staff involved with the study programme are expected to wear their identity badges. Staff should report to the Chief Operations Officer, Head of Study Programmes or Assistant Curriculum Leader in the event of a lost lanyard.

Lanyards will be given to all visitors. Visitors to the site must be accompanied at all times and must be challenged if seen walking around the study programme site without a member of study programme staff and reported to the Site Leader or Tutor immediately.

11. The Child Protection Policy

11.1 The designated senior lead for Child Protection is Neil Ouldrige, Head of Study Programmes. The designated Director responsible for liaising with the relevant Local Authority and/or Education Funding Partners, as appropriate in the event of allegations being made against the Chief Operations Officer, is Craig Beecham.

11.2 There is a detailed Child Protection Policy, which will be attached to this document. It is the Director's duty to ensure the policy is reviewed annually and any deficiencies within the policy addressed immediately. All VLUK staff have had appropriate Child Protection Training, which is updated at least every three years.

The Child Protection Policy includes a statement on physical restraint. This school follows DFE guidelines on the use of reasonable force, which asserts that physical restraint may be

used if there is a possibility that a child may be about to cause harm to him/ herself or to another. It also asserts that on no occasion should such physical contact be used as a punishment. For further information, please see the Physical Restraint Policy and DFE advice on 'use of reasonable force'.

11.3 All concerns regarding children at risk of significant harm will be dealt with following the relevant LSCB Procedures via VLUK Child Protection Coordinator. The contact details for referrals to Children's Services will vary dependent on the site raising the concern. Neil Ouldrige, VLUK lead, will communicate with the relevant LSCB.

12. The Design of the Study Programme and the Work Experience Agenda

12.1 The curriculum deals with safeguarding in two ways:

- The curriculum in the ICE (Identity, culture and ethics) curriculum, where relevant issues are discussed with the children. Topics include such themes as British Values, Drugs, Sex and Relationships and Stranger Danger, Child Sexual Exploitation and Female Genital Mutilation. Children are encouraged to explore and reflect upon these issues.
- The curriculum is designed so that safety issues within the subject are discussed, and safe practices taught, such as using equipment properly in PE, sport and Fitness.

At all times there has to be appropriate staffing levels and when the study programme is taken off site, appropriate and agreed pupil/adult ratios are maintained. The lead adult always assesses visits as to the level of risk and all trips are finally authorised by the Head of Study Programmes or Chief Operations Officer.

Visiting speakers, with correct clearance, are always welcome into school so that they can give specialist knowledge to the children.

12.3 Introduction and development of a range of PSHE materials helps to develop resilience and reduce vulnerability. The resources focus on teaching social, emotional and behavioural skills to all pupils. This helps to develop student's emotional health and well-being. Children and young people with good self-esteem value and seek to protect themselves and others.

13. Internet Safety

13.1 Children should be encouraged to use the internet as much as is possible, but, at all times, in a safe way. If teachers know of misuse, either by a teacher or child, the issue should be reported to the Assistant Curriculum Leader, Head of Study Programmes or Chief Operations Officer without delay.

13.2 VLUK and Site Leaders will ensure safe internet provision through its internet provider.

13.3 VLUK will operate in compliance with the agreed Acceptable Use Policy. VLUK updates this guidance on e-safety to comply with the relevant LSCB procedure.

13.4 For further information refer to the E-safety Policy.

14. Diversity and Equality (To include duties for Race, Gender and Disability)

14.1 The school will comply with the Equality Act 2010 and will operate in compliance with the relevant Educational Funding Partner Policies.

14.2 At VLUK we try to ensure that everyone is treated fairly. All young people are given equal access to the study programme and its curriculum and all at VLUK are considered equal in the learning partnership. When Young people have special needs we make arrangements to inform parents and design specific programmes.

14.3 Learners with disabilities must be able to take a full and active part in every lesson and every measure must be taken to ensure this.

15. Behaviour Policy

Good behaviour is essential at VLUK sites and study programmes, we have high expectations for this. Our Behaviour Policy details the rewards and sanctions available to staff. Although the emphasis is always on the positive there are also times when young people have to be disciplined in order to maintain the safety and security of all young people. For further details, refer to the Behaviour Policy.

Staff are discouraged from handling young people, but when they deem it is safest to do so, guidance has been given on safe methods of restraining a child so that they do not harm either themselves or others. For further guidance refer to the Physical Restraint Policy.

16. Anti-Bullying Policy

VLUK definition of bullying is: "Bullying is a behaviour which can be defined as a repeated attack, physical, psychological, social or verbal by nature, by those in a position of power which is formally or situationally defined, with the intention of causing distress for their own gratification" (Besag,1989).

The school agree with The Anti-Bullying Alliance, that bullying falls into two categories:

- Emotionally harmful behaviours such as taunting, spreading hurtful rumours, cyber bullying and excluding people from groups
- Physically harmful behaviours such as kicking, hitting, pushing or other forms of physical abuse.

and it is bullying if:

- It is repetitive, wilful or persistent
- It is intentionally harmful, carried out by an individual or group
- There is an imbalance of power leaving the person who is bullied feeling defenceless

VLUK's response to this is unequivocal. Adults must be informed immediately and action will take place. Young people are encouraged to 'TELL'. Although bullying at VLUK sites is rare, VLUK always acts swiftly with a process of investigation, communication and action. Bullying will not be tolerated. For further detail with regards to Anti-Bullying, refer to the specific policy.

17. Racial respect and understanding

17.1 In line with the Diversity Policy VLUK asserts that pupils will be prepared for an ethnically diverse society. VLUK will work hard to promote racial equality and harmony by preventing and challenging racism. If anyone ever feels unjustly treated then VLUK welcomes and values a response. It is in working together that we will make VLUK even better.

17.2 Racism is tackled in Tutorial sessions and aspects of the study programme. The young people take part in discussions designed to raise awareness and address prejudices. From time to time visitors work with the young people.

17.3 The school operates in line with the government's Prevent Agenda.

18. Record Keeping

We take account of guidance issued by the Department for Education to:

- Keep written records of concerns about children, even where there is no need to refer immediately.
- Ensure all records are kept securely.
- Ensure that, when a young person who is subject to a Child Protection Plan leaves, their information is transferred to the new education establishment immediately and that the child's social worker is informed.

19. Photographing and videoing

We have taken a sensible, balanced approach to photographs and videoing on VLUK sites, along with activities off site. VLUK will seek individual permission from parents/carers to photograph the individual child; this is done upon enrolment to a VLUK study programme at the beginning of the academic year. For group activities outside the study programme, permission will be sought from all parents/carers. If an individual parent does not agree to the photographing or videoing of their child in the group activity this may prohibit photographing or videoing the group activity or it will be done sensitively without including the specific child in the photographs or videos. VLUK will operate within the above guidelines, which allows parents to photograph or video.

20. Whistle-blowing or Allegations against a member of staff

Any member of staff or visitor to the school who has concerns about people working with children and their suitability, whether they work in a paid or unpaid capacity has a responsibility to follow the relevant LSCB Managing Allegations Against People who work with Children Procedures. They should notify the designated Assistant Curriculum Leader, Head of Study Programmes or Chief Operations Officer. The concern will then be raised with the Directors. All concerns reported will be appropriately recorded and information treated according to VLUK's confidentiality policy. For any complaints about the Chief Operations Officer, the Directors should be contacted directly. Further guidance is available from the DfE website Dealing with Allegations of Abuse against Teachers and other staff – Guidance for Local Authority, Head Teachers, School staff, Governing Bodies and proprietors of Independent Schools

21. Allegations against a pupil

This will be dealt with via VLUK's Behaviour Policy and Anti-Bullying Policy. Where there is a referral to Children's Services or subject to a Police investigation, risk assessments of the situation will be completed and shared with appropriate staff parents and other agencies involved.