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VLUK Safeguarding Policy 2020-2021

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1. PURPOSE

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, VLUK Designated Safeguard Lead

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 Managing 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.

In order to fulfil their duty under sections 157 and 175 of the Education Act 2002, all educational settings, including Independent Training Providers, to whom the duty applies should have in place the arrangements to develop and improve their practice and the practice of others. In addition, the Designated Safeguard Lead, Senior Leadership Team, Directors and Governing Body 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 2020](#)), in which guidance commenced in 1st September 2020. 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 6/8)

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.

VLUK 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 acknowledge awareness of systems and policies within VLUK which support safeguarding, when they sign that they have read and understood Part One of the [Keeping Children Safe in Education 2020 statutory guidance](#).

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 (DSL) Neil Ouldrige and he is assisted by two further DSLs.

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

VLUK 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. VLUK Education Programmes 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 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.
- Referral to VLUK's counsellor
- Liaison with other external agencies and educational partners that support the child.

5. Health and Safety

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

A copy of this policy can be viewed on request.

The Chief Operations Officer, the member of staff with responsibility for Health and Safety, Director Of Quality & Compliance and the Managing 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. 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

On matters of an intimate nature, staff are expected to deal with a child with utmost sensitivity and always to seek guidance from the Designated Safeguard Leads. 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 service will be contacted as a matter of urgency before the parent.

7. Site Security

7.1 All VLUK study programme sites provide 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 Performance Mentor. 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 VLUK has a policy of phoning or emailing home to ascertain each child's whereabouts. For specific information and guidance about the 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 learners to attend regularly and punctually and VLUK has a duty to report such issues to the relevant authorities.

9. Safer Recruitment including Staff Conduct

9.1 Appointments of staff and induction of newly appointed staff and work placements. All staff appointed to VLUK will be in compliance with [Keeping Children Safe in Education \(2020\)](#) and will operate within relevant Standards for Safer Recruitment Procedures. People working and volunteering within the organisation 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 VLUK Managing 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.

9.3 All new staff at VLUK will receive an induction session on safeguarding children. New VLUK staff will also undergo Level 2 Child Protection Awareness training.

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 circumstance 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 staff will check the identity of visitors 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 programmes are expected to wear their identity badges. Staff should report to either the Operations Director or their 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 Performance Mentor or Tutor immediately.

11. The Child Protection Policy

11.1 The Designated Safeguard Lead for Child Protection is Neil Ouldrige, there are also two other DSL's employed within the organisation. The designated governor responsible for liaising with Education Funding Partners and external organisations, as appropriate, in the event of allegations being made against the Chief Operations Officer or DSL's, is Neil Holman.

11.2 There is also a detailed Child Protection Policy. It is the duty of the VLUK leadership team and governors 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 two years.

The Child Protection Policy includes a statement on physical restraint. VLUK follows DFE guidelines on use of reasonable force, which asserts that physical restraint may be used if there is the 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 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 one of VLUK's Designated Safeguard Leads. The contact details for referrals to Children Services will vary dependent on the site raising the concern. One of the VLUK DSL's, 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 Tutorial 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 Performing Arts, 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 learner/adult ratios are maintained. The lead adult always assesses visits as to the level of risk and all trips are finally authorised by the Director Of Quality & Compliance or Chief Operations Officer.

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

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, Director Of Quality & Compliance or Chief Operations Officer without delay.

13.2 VLUK site staff will promote safe internet provision through its internet provider.

13.3 VLUK operates an agreed Acceptable Use Policy. VLUK update their guidance in accordance with the DFE's [Teaching Online Safety in Schools](#) and the [Online safety in schools and colleges: Questions from the Governing Board](#)

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

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

14.1 VLUK will comply with the [Equality Act 2010](#) and will operate in compliance with the relevant 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 DfE's guidance on [Use of reasonable force in schools](#).

16. Anti-Bullying

VLUK agrees with The [Anti-Bullying Alliance](#) definition of [bullying](#) "bullying as the repetitive, intentional hurting of one person or group by another person or group, where the relationship involves an imbalance of power. It can happen face to face or online."

Bullying behaviour can be:

- Physical – pushing, poking, kicking, hitting, biting, pinching etc.
- Verbal - name calling, sarcasm, spreading rumours, threats, teasing, belittling.
- Emotional – isolating others, tormenting, hiding books, threatening gestures, ridicule, humiliation, intimidating, excluding, manipulation and coercion.
- Sexual – unwanted physical contact, inappropriate touching, abusive comments, homophobic abuse, exposure to inappropriate films etc.
- Online /cyber – posting on social media, sharing photos, sending nasty text messages, social exclusion
- Indirect - Can include the exploitation of individuals.

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.

17. Racial respect and understanding

17.1 In line with the Equality & 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 programmes. 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 VLUK 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.

To meet this guidance, in 2021 VLUK introduced CPOMS as their safeguarding, pastoral and wellbeing solution

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 video. 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 who has concerns about people working with children and their suitability, whether they work in a paid or unpaid capacity has a responsibility to notify the relevant Assistant Curriculum Leader, Director Of Quality & Compliance or Chief Operations Officer. The

concern will then be raised, if required, with the Managing Directors. All concerns reported will be appropriately recorded and information treated according to the guidance in VLUK's staff handbook.

21. Allegations against a pupil

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

22. Definitions

Child: A child is any person under 18 years of age. (Children's Act, 1989)

Vulnerable adult: A vulnerable adult is defined as a person 'who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.' (Department of Health, 2000)

Child Protection: The protection of children from violence, exploitation, abuse and neglect

Duty of care: This is the duty which rests upon an individual to ensure that all reasonable steps are taken to ensure the safety of a student involved in any activity, or interaction for which that individual is responsible. Any person in charge of, or working with students in any capacity, is considered both legally and morally to owe them a duty of care.

Designated person: A member of staff who has responsibility for receiving and handling safeguarding and child protection concerns and has been trained to perform the role to an appropriate level.

Early help: Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from coordinated early help, an early help inter-agency assessment should be arranged.

Safeguarding: Wider than Child Protection and is defined as: protecting from maltreatment preventing impairment of health or development ensuring that a person is growing up in circumstances consistent with the provision of safe and effective care and taking action to enable all children have the best outcomes to enable optimum life chances and to enter adulthood successfully.

Safeguarding is also about being proactive and putting measures in place in advance of any contact with students to ensure that students are going to be kept safe.

This list is not exhaustive and there may be other safeguarding issues that within the organisation;

Abuse: A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children.

Emotional Abuse: Defined as persistent emotional ill treatment which is likely to cause serious harm to emotional development.

Neglect: The persistent failure to meet a person's basic physical and psychological needs, which is likely to result in serious impairment to health and development.

Physical abuse: This can best be described as actions such as hitting, shaking, throwing, poisoning, burning, scalding, drowning or suffocating that cause harm to an individual. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Sexual abuse: Forcing or enticing a child/young person or vulnerable adult to take part in sexual activities, whether or not they are aware of what is happening. It may involve penetrative or non-penetrative acts and includes involving children/young people or vulnerable adults in watching pornographic material or watching sexual acts.

Forced marriage: Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage.

Human trafficking/modern slavery: Modern Slavery is the term used within the UK and is defined within the Modern Slavery Act 2015. The Act categorises offences of Slavery, Servitude and Forced or Compulsory Labour and Human Trafficking (which comes from the Palermo Protocol).

Child Sexual Exploitation: This is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Female Genital Mutilation: Comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Radicalisation: The process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Extremism: The vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces

Prevent Duty: All Training Providers and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty

Channel: Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for organisations to make referrals if they are concerned that an individual might be vulnerable to radicalisation

Domestic abuse: Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to; psychological, physical, sexual, financial and emotional.

Peer on Peer abuse: Children can abuse other children. This is generally referred to as peer on peer abuse and can take many forms. This can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals.

Child criminal exploitation: County lines: Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns

Up skirting: The practice typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals and buttocks. The Voyeurism Act outlaws 'upskirting' where the purpose is to gain sexual gratification or to cause humiliation, distress or alarm.

References

This policy complies with:

- Keeping Children Safe in Education, updated January 2021
- Equality and Diversity Act 2010
- Health and Safety Act
- Prevent Duty Guidance
- Education Act 1996
- Article 8 of the European Convention on Human Rights
- Section 91 of the Education and Inspections Act 2006