Virtual Learning uk

TITLE	VERSION
Safeguarding and Child Protection Policy 2026-2027	6

APPROVAL BODY	DATE	REVIEW DATE
Board of Governors	August 2026	August 2027

LEAD PERSON	Head of Safeguarding (DSL)

POLICY STATEMENT

VLUK acknowledges the duty of care to safeguard, protect and promote the welfare of children and is committed to ensuring safeguarding practice reflects statutory responsibilities, government guidance and complies with best practice.

VLUK recognises that safeguarding practice continues to evolve in response to legislative changes, emerging risks, changes in statutory guidance and developments in education. We are committed to maintaining a culture of vigilance, early intervention and continuous improvement, ensuring that all safeguarding decisions are person-centred and made in the best interests of the learner.

It is essential that everybody working at VLUK understands and fulfils their safeguarding responsibilities. Everyone who comes into contact with our learners and families has a role to play in ensuring children and young people are safe from abuse, neglect, exploitation and harm. VLUK is committed to safeguarding children and aims to create a culture of vigilance. All staff should make sure that any decisions made are in the best interests of the learner.

BACKGROUND

VLUK is a National Independent Training Provider, delivering education in the 16-19 FE sector. It is part of The Oxford Virtual Education Group. VLUK is led by a Chief Executive Officer, accountable to a Board of Governors and Group Chief Executive Officer and supported by an Executive team and a Senior Leadership Team (SLT). Accountable to the SLT is a layer of middle management located throughout the country. The Middle Leadership team is responsible for tutors and enrichment staff.

PURPOSE

This policy ensures the child is safe and prevents them from suffering further harm by supporting the strengths, addressing the vulnerabilities and risk factors and helping meet their unmet needs, to promote the child's welfare, health and development. This policy provides the basis for good practice within VLUK for Safeguarding work. This is in keeping with relevant national procedures and reflects what VLUK considers to be safe and professional practice in this context. This policy also reflects emerging safeguarding risks, including those associated with artificial intelligence, (AI), technology-facilitated abuse and online harm, and will be reviewed to ensure it continues to reflect statutory guidance and best practice and ensure VLUK Complies with statutory guidance including Keeping Children Safe in Education (KCSIE), Working Together to Safeguard Children, the Prevent Duty, and the Education and Training (Welfare of Children) Act 2021

SCOPE

This policy applies to all staff members at VLUK, including all permanent, temporary and support staff, governors, volunteers, external providers or activity providers.

DEFINITIONS

Child protection, as defined by the NSPCC, is a crucial part of safeguarding, focusing on protecting children who are suffering, or are at risk of suffering, significant harm

Safeguarding and promoting the welfare of children is defined as:

- providing help and support to meet the needs of children as soon as problems emerge.
- protecting children from maltreatment, whether that is within or outside the home, including online.
- preventing the impairment of children's mental and physical health or development.
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes.
- a child is defined as any individual under the age of 18.

RESPONSIBILITIES

Board of Governors	The Governing Board or a delegated committee review and challenge the effectiveness of the internal controls and the management of risk detailed in this policy. The governing body is collectively responsible for ensuring that safeguarding arrangements are fully embedded within VLUK's ethos and reflected in its day-to-day practice.
Chief Executive Officer	Overall responsibility and oversight of this policy, ensuring resources are used effectively and appropriately.
Executive & Senior Leadership Teams	Responsible for supporting the DSL in enforcing the statutory guidance set out by the DfE in this policy.
Lead Person	Responsible for the implementation and delivery of this policy; ensuring the policy aligns with regulatory requirements and best practice.
The Safeguarding Team	VLUK's Designated Safeguarding Lead (DSL) has overall designated responsibility for safeguarding. Deputy designated safeguarding Lead (s) ensure there is always appropriate cover for this role. The responsibilities of all Designated Safeguarding Lead are described in detail in Appendix A. The DSL is also responsible for receiving and responding to Operation Encompass notifications, ensuring appropriate action is taken to support learners who may have been affected by domestic abuse and maintaining oversight of safeguarding themes and emerging risks across the organisation. Contact information DSL - Amy Dearnaley amy.dearnaley@vluk.org DDSL- Marley Lodge marley.lodge@vluk.org DDSL - Danny Holmes danny.holmes@vluk.org DDSL - Aime Dovey aime.dovey@vluk.org
All Line Managers	Responsible for ensuring all employees are aware of and follow this policy and adhere to it.
All Employees and Volunteers	Follow and adhere to this policy and associated procedures.

POLICY - SUPPORTING LEARNERS

VLUK supports learners by:

- Ensuring the content of the curriculum includes social and emotional aspects of learning; Through Tutorial and other curriculum contexts, and ensuring that learners are taught about safeguarding so that they 'recognise when they are at risk and how to get help when they need it'.
- Ensuring a comprehensive response to online safety, enabling learners to learn about the risks of new technologies and social media and to use these responsibly.
- Educating learners about emerging online risks, including AI, deepfakes, misinformation, online exploitation and technology facilitated abuse, enabling learners to develop the knowledge and skills to use technology safely and responsibly.

- Encouraging learners to talk about feelings and deal assertively with pressures and are listened to, providing learners with a range of appropriate adults to approach as needed.
- Supporting learners to feel safe, develop confidence and independence and increase the development of self-esteem and self-assertiveness while not condoning aggression or bullying.
- Liaising and working together with other support services and those agencies involved in safeguarding children, including domestic abuse, mental health and other preventative services:
- Working in partnership with Operation Encompass and other safeguarding partners to ensure learners affected by domestic abuse receive timely and appropriate support.
- Considering intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment.
- Having a behaviour policy that is aimed at supporting vulnerable learners at VLUK campuses. The behaviour policy outlines measures to prevent bullying, including cyber-bullying, prejudice-based and discriminatory bullying.
- Having clear procedures are in place for addressing and minimising the risk of child-on-child abuse, including harmful sexual behaviours, sexual violence and sexual harassment.
- Acknowledging the importance of 'contextual safeguarding', which considers wider environmental factors in a learner's life that may be a threat to their safety and/or welfare. (Working together to safeguard children 2023 and KCSIE September 2025).
- Alerting the relevant authority if it is aware of any learner being looked after under a Private Fostering arrangement.
- Acknowledging that a 'child that is looked after' or has been previously looked after by the Local Authority potentially remains vulnerable and all staff have the skills, knowledge and understanding to support these learners.

POLICY - OPERATION ENCOMPASS

VLUK participates in Operation Encompass, the national police and education information-sharing partnership. Where police attend an incident of domestic abuse and identify that a learner has been affected the Designated Safeguarding Lead (DSL), or nominated key adult will receive an Operation Encompass notification before the next educational session, wherever possible. Information received through operation encompass will be treated as confidential safeguarding information , recorded securely and used to ensure timely safeguarding support is provided.

POLICY - DEALING WITH A DISCLOSURE & RECORD KEEPING

If a member of staff has a concern about a learner or if a learner makes a disclosure, staff appropriately respond by listening and offering reassurance.

It is expected that VLUK staff:

- Make an accurate factual record as soon as possible using CPOMS, including details of:
    - Dates and times of their observations.
    - Dates and times of any discussions in which they were involved.
    - Any injuries.
    - Explanations given by the learner / adult.
    - What action was taken.
    - Any actual words or phrases used by the learner.
    - Any questions the staff member asked (remembering not to ask any leading questions).

<u>All concerns and incidents recorded on the CPOMS electronic recording system that VLUK has in place.</u>

- The DSL considers if there is a requirement for immediate medical intervention, however urgent medical attention should not be delayed if the DSL is not immediately available.
- In the absence of the DSL/DDSL or HoC staff refer directly to MASH or the learner's social worker (if applicable) and the police (if appropriate).
- The DSL ensures any decisions and justifications for those decisions are recorded in writing with clear outcomes documented following any action taken.
- The appropriate member of staff discusses any concerns with the learner's parents. There may be occasions when this is not appropriate and VLUK staff would consult with other agencies prior to involving parents. A record of any decision not to discuss is also added.

- Safeguarding records are kept for individual children and are maintained separately from all other records relating to the learner at VLUK. Safeguarding records are kept in accordance with General Data Protection Regulations (GDPR) and our own GDPR policy.
- Safeguarding records will remain factual, accurate and contemporaneous. Access will be restricted to authorised safeguarding personnel and retained in accordance with organisational retention requirements.
- Operation Encompass notifications will also be recorded on CPOMS safeguarding recording system and managed in accordance with the same safeguarding procedures as any other safeguarding concern
- The Director of Performance, Standards & Curriculum is kept informed of any significant concerns by the DSL and all other staff are informed on a need-to-know basis.

POLICY - INFORMATION SHARING

- VLUK recognises that all matters relating to Safeguarding are confidential.
- All staff members have a professional responsibility to share information with other agencies to safeguard children.
- All staff members who come into contact with VLUK learners are given appropriate training to understand the purpose of information sharing in order to safeguard and promote children's welfare.
- VLUK ensures that staff members are confident about what they can and should do under the law, including how to obtain consent to share information and when information can be shared without consent.
- Staff take action and share information that might be critical in keeping children safe.
- Information received through Operation Encompass will be strictly shared on a need to know basis to ensure appropriate safeguarding support whilst maintaining confidentiality and complying with UK GDPR and data protection Act 2018.

POLICY - MULTI AGENCY SHARING

- VLUK develops and promotes effective working relationships with children's social care, family help services, (where applicable), police, health services, Operation Encompass, local safeguarding children partnerships and other safeguarding partners to promote the welfare of our learners.
- VLUK ensures that relevant staff members participate in multi-agency meetings, including child protection conferences and core groups, to consider individual learners.
- VLUK participates in Child Safeguarding Practice Reviews (CSPRs), other reviews and file audits as and when required to do so by the relevant Children's Safeguarding Board. We ensure that we have a clear process for gathering the evidence required for reviews and audits and embed recommendations into practice and compile required actions within agreed timescales.
- Effective safeguarding relies upon timely information sharing and collaborative working with parents/carers (where appropriate), local authorities, children's social care, police, health professionals, education providers and other relevant agencies in accordance with statutory guidance.

POLICY - SAFER RECRUITMENT

- VLUK is committed to ensuring the development of a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with our learners and staff.

POLICY - TRAINING

- All staff members receive safeguarding and child protection trainingappropriate to their role, including online safety, child-on-child abuse, Prevent, Operation Encompass awarness, emerging online harms and artificial intelligence. Staff also receive regular safeguarding updates throughout the academic year to ensure safeguarding practice remains current. Updates are also provided on any legislative changes, safeguarding reviews, learning from safeguarding practices and emerging safeguarding risks.
- The DSL undergoes training to provide them with the knowledge and skills required to carry out their role.
- The DSL and any members of the Safeguarding Team undergo the DSL training every 2 years to enable them to fulfil their role.
- Training is provided for all staff to a generalist level every 3 years, regular updates around safeguarding are shared with staff.
- Separate training is provided to all new staff on appointment as part of their induction process.

- All staff receive appropriate Online Safety training, which includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring.
- The Designated Safeguarding Lead provides briefings to VLUK on any changes to safeguarding legislation and procedures and relevant learning from Safeguarding Practice Reviews (CSPRs) in line with Working Together 2023. These occur annually or more frequently when necessary.
- VLUK maintains accurate and up to date records of staff induction and training.

POLICY - CAMPUS SECURITY

- All staff members have a responsibility to ensure VLUK campuses are safe.
- VLUK does not accept the behaviour of any individual, parent or anyone else, that threatens campus security or leads others, learner or adult, to feel unsafe. Such behaviour is treated as a serious concern and may result in a decision to refuse the person access onto the campus.
- All staff are expected to wear their staff ID at all times whilst on campus.

POLICY - QUALITY ASSURANCE

- VLUK ensures that systems are in place to monitor the implementation of and compliance with this policy and accompanying procedures.
- VLUK sets its annual safeguarding audit based on the Section 175 safeguarding audit, which is carried out under Section 175 of the Education Act 2002, along with DfE Guidance on Safeguarding Children, Safer Recruitment and Keeping Children Safe in Education 25.
- VLUK's senior leadership ensures that action is taken to remedy any deficiencies and weaknesses identified in child protection arrangements without delay.

POLICY - PROFESSIONAL CURIOSITY

All staff should maintain professional curiosity when responding to safeguarding concerns. This involves respectfully exploring inconsistencies, asking appropriate questions, considering the wider context and remaining open to the possibility that a learner may be experiencing abuse, neglect or exploitation, even where this is not immediately evident.

POLICY - CONTEXTUAL SAFEGUARDING

VLUK recognises that safeguarding risks can occur beyond the family home and may arise within peer groups, educational settings, online environments and local communities. Safeguarding assessments should consider these wider influences alongside the learner's individual circumstances.

POLICY - ARTIFICIAL INTELLIGENCE

Staff should be aware that artificial intelligence (AI) can be used to facilitate safeguarding risks including grooming, exploitation, deepfake imagery, impersonation, misinformation, radicalisation and online abuse. Learners should be supported to critically evaluate online content and report concerns promptly

COMPLAINTS

Complaints about Safeguarding and Child Protection at VLUK should be made to the Head of Safeguarding in the first instance - amy.dearnaley@vluk.org Following this, and if required, please refer to the VLUK comments & complaints policy. If staff feel a safeguarding concern is not being handled appropriately internally, they must utilize the VLUK Whistleblowing Policy or contact the NSPCC Whistleblowing Helpline on 0800 028 0285.

REFERENCES

Preventing Radicalisation and Extremism Policy
Online Safety Policy
Whistleblowing Policy
Behaviour Policy
Safer Recruitment and Vetting Policy

This policy has been developed in accordance with the following statutory guidance and local safeguarding procedures:

Working Together to Safeguard Children: Statutory Guidance on Multi-Agency Working to Help Support and Protect Children2026

Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges, September2026
Information Sharing Advice for practitioners providing safeguarding services for children, young people, parents and carers 2024
https://assets.publishing.service.gov.uk/media/66320b06c084007696fca731/Info_sharing_advice_content_May_2024.pdf
Operation Encompass- National Guidance for Educational Settings:
https://www.operationencompass.org/educational-settings

SIGNATORIES



Chief Executive Officer
1st August 2026



Chair of Governors
1st August 2026

APPENDIX A:

The role of the Designated Safeguarding Lead

Managing referrals:

- Refer cases to MASH, and the police where appropriate, in a timely manner avoiding any delay that could place the learner at more risk.
- Identify any safeguarding issues relating to individual learners, especially ongoing enquiries under section 47 of the Children Act 1989.
- Act as a source of support, advice, and expertise to staff members on matters of child protection and safeguarding, including Contextual Safeguarding.
- VLUK ensures it notifies the Department for Education via the Customer Help Portal: Home - Customer Help Portal (education.gov.uk) where a referral has been made by VLUK or one of the Contractor Related Parties in either of the following circumstances (such notification must include the name of the institution, a high level summary of the nature of the incident (without sharing personal information about victims or alleged perpetrators) and confirmation of whether it is, or is scheduled to be, investigated by the Local Authority and/or the police):
- A safeguarding concern related to sexual violence to Local Authority children's social care/adult social care and/or the police, or
- An allegation of abuse made against a teacher, lecturer or other member of staff to the designated officer(s) (at the local authority).

Record keeping:

- The DSL evidences decision making which requires an understanding of risk and professional curiosity. The DSL should "be able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc".
- Keep online records of safeguarding and welfare concerns and ensure a stand-alone file is created as necessary for learners with safeguarding concerns.
- VLUK should have at least two emergency contacts for every learner in case of emergencies, and in case there are welfare concerns at the home.
- Maintain a chronology of significant incidents for each learner with safeguarding concerns, including a record of decisions made and the reasons for those decisions.
- Ensure such records are kept confidentially and securely and separate from the learner's educational record.

Multi-agency working and information sharing:

- The DSL recognises and is committed to its responsibility to work with other professionals and agencies in line with statutory guidance.
- VLUK is not the investigating agency when there are child protection concerns. We contribute to the investigation and assessment processes as required and recognise the importance of multi-agency working. The appropriate staff member attends relevant safeguarding meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or other early help multi-agency meetings.

Training:

The DSL ensures all staff undertake appropriate annual updates in order to:

- Be able to recognise signs of abuse and how to respond to them, including special circumstances such as child sexual exploitation, female genital mutilation, fabricated or induced illness.
- Have a working knowledge of how the local authority conducts initial and review child protection (CP) case conferences and contribute effectively to these; and
- Be alert to the specific needs of learners in need (as specified in section 17 of the Children Act 1989), those with special educational needs, pregnant teenagers, young carers, those who are privately fostered, vulnerable to exploitation, racialisation and subject to listening or hearing to domestic abuse.
- Ensure each member of staff has read and understands the safeguarding policy and procedures, including providing induction on these matters to new staff members. Induction and training must include dealing with disclosures and managing allegations processes.
- Organise Safeguarding training for all staff members at least every two years.
- The DSL ensures their training remains in date (every 2 years).

- All staff should be aware of key policy systems within VLUK which support safeguarding, and these should be explained to them as part of staff induction.
- Ensure VLUK allocates time and resources every year for relevant staff members to attend training and receive continuous professional development opportunities.
- Encourage a culture of listening to learners and taking account of their wishes and feelings in any action VLUK takes to protect them.

Awareness raising:

- Ensure the VLUK safeguarding policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies regarding this.
- Ensure our safeguarding policy is available publicly and parents know referrals about suspected abuse or neglect may be made and the role of VLUK in this.

Quality assurance:

- Provide regular reports to the governing body detailing changes and reviews to policy, training undertaken by staff members and the number of learners with child protection plans and other relevant data.
- Take lead responsibility for remedying any deficiencies and weaknesses identified in Safeguarding arrangements.

APPENDIX B:

Safeguarding Procedures

Definitions:

- **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. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g., via the internet). They may be abused by an adult or adults or another child or children.

- **Children** are any people who have not yet reached their 18th birthday; a 16-year-old, whether living independently, in further education, in the armed forces or in hospital, is a child and is entitled to the same protection and services as anyone younger. KCSIE now applies to providers of post 16 education as set out in the Education and Training (Welfare of Children) Act 2021.

- **Child protection** is part of safeguarding and promoting the welfare of children and refers to activity undertaken to protect specific children who are suffering, or likely to suffer, significant harm, or significant harm is suggested.

- **Early help** means providing support as soon as a problem emerges, at any point in a child's life, from the foundation years to teenage years.

- **Harm** is ill treatment or impairment of health and development, including impairment suffered from seeing or hearing the ill treatment of another.

- **Safeguarding children** is the action we take to promote the welfare of children and protect them from harm.

- **Safeguarding and promoting the welfare of children** is defined as:
    - Protecting children from maltreatment.
    - Preventing the impairment of children's mental health, physical health or development.
    - Ensuring the 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.

  Staff are particularly important, as they are in a position to identify concerns early, provide help for learners, promote learner's welfare, and prevent concerns from escalating (KCSIE 2024)

  A bespoke helpline for learners and young people who've experienced abuse, and for worried adults and professionals that need support and guidance. If you are concerned about something, you can contact the NSPCC helpline Report Abuse in Education on 0800 136 663 or email help@nspcc.org.uk

- **Significant harm** is the threshold that justifies compulsory intervention in the family in the best interests of the learner. Section 47 of the Children Act 1989 states 'where the question of whether harm suffered by a learner is significant to their health or development shall be compared with that which could reasonably be expected of a similar learner.'

- **Vulnerable children**: Any learner may benefit from early help, but all VLUK staff should be particularly alert to the potential need for early help for a learner who:
    - Is disabled and has specific additional needs.
    - Has special educational needs (whether they have a statutory Education, Health and Care Plan).
    - Is a young carer.
    - Is showing signs of being drawn into antisocial or criminal behaviour, including gang involvement and association with organised crime groups.
    - Is frequently missing/goes missing from care or from home.
    - Is at risk of modern slavery, trafficking, or exploitation.
    - Is at risk of being radicalised or exploited.
    - Is in a family circumstance presenting challenges for the learner, such as drug and alcohol misuse, adult mental health issues and domestic abuse; https://www.gov.uk/government/collections/domestic-abuse-bill
    - Is misusing drugs or alcohol themselves.

- Has returned home to their family from care; and
- Is a privately fostered child.
- Has experienced domestic abuse, parental imprisonment, bereavement, homelessness or other adverse childhood experiences (ACEs).
- Is persistently absent from education or has experienced periods of being missing from education.
- Is at risk of online harm, including grooming, exploitation, radicalisation, coercion or abuse facilitated through emerging technologies, including artificial intelligence (AI).
- Children and young people may experience a range of vulnerabilities and safeguarding risks regardless of gender identity. Staff should respond sensitively, maintain professional curiosity, consider the individual circumstances of each learner, involve parents/carers where appropriate and safe to do so, and seek advice from the Designated Safeguarding Lead where safeguarding concerns are identified.

CATEGORIES OF ABUSE:

- **Emotional abuse** is the persistent emotional maltreatment of a child such that it causes severe and persistent adverse effects on the child's emotional development and conveying that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.

  It may include:
  - Not giving the child opportunities to express their views.
  - Deliberately silencing them or 'making fun' of what they say or how they communicate.

  It may feature:
  - Age or developmentally inappropriate expectations being imposed on children
  - Interactions that are beyond a child's developmental capability overprotection and limitation of exploration and learning.
  - Preventing the child from participating in normal social interaction. seeing or hearing the ill-treatment of another.
  - Serious bullying (including cyberbullying).
  - Causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

  Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

  Staff should recognise that emotional abuse can occur both in person and online through social media, messaging platforms, gaming, artificial intelligence (AI), manipulated imagery, deepfakes and other digital technologies.

- **Neglect** is the persistent failure to meet a child's basic physical or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance misuse.

  Once a child is born, it may involve a parent failing to:

  - Provide adequate food, clothing, and shelter, including exclusion from home or abandonment.
  - Protect a child from physical and emotional harm or danger.
  - Ensure adequate supervision, including the use of inadequate care givers.
  - Ensure access to appropriate medical care or treatment.
  - It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.
  - Educational neglect is also considered: https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/neglect/

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

- **Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.

The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing.

They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education (KCSIE 2024).

MENTAL HEALTH:

- All VLUK staff should also be aware that mental health problems can, in some cases, be an indicator that a learner has suffered or is at risk of suffering abuse, neglect or exploitation
- Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe learners day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one
- Where learners have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these learner's experiences, can impact on their mental health, behaviour, and education
- If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy, and speaking to the designated safeguarding lead or a deputy.
- Staff should adopt a trauma-informed approach, recognising that behaviour may be a communication of unmet need or previous trauma. Responses should be proportionate, supportive and centred on the learner whilst maintaining appropriate professional boundaries.

  https://www.gov.uk/government/publications/promoting-children-and-young-peoples-emotional-health-and-wellbeing

The department has published advice and guidance on Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools (which may also be useful for training providers). In addition, Public Health England has produced a range of resources to support Post-16 Tutors to promote positive health, wellbeing and resilience among young people including its guidance Promoting children and young people's emotional health and wellbeing. Its resources include social media, forming positive relationships, smoking and alcohol. See Every Mind Matters for links to all materials and lesson plans.

There are three thresholds for and types of referral that need to be considered:

- Is this a learner with additional needs; where their health, development or achievement may be adversely affected?
- Age-appropriate progress is not being made and the causes are unclear.
- The support of more than one agency is needed to meet the learner's needs.

If this is a learner with additional needs, discuss the issues with the SENCO coordinator at VLUK, the learner, and parents.

Is this a child in need?

Section 17 of the Children Act 1989 says:

- They are unlikely to achieve or maintain, or to have opportunity to achieve or maintain, a reasonable standard of health or development, without the provision of services by a local authority.
- Their health or development is likely to be impaired, or further impaired, without the provision of such services.
- They are SEND (and as such can face additional safeguarding challenges).

If this is a child in need, discuss the issues with the Designated Safeguarding Lead and parents. Obtain their consent for referral.

Is this a child protection matter? Section 47 of the Children Act 1989 says:

- The learner is at risk or who are suffering significant harm
- The learner is suffering the effects of significant harm

- The learner has serious health problems

If this is a child protection matter, this should be discussed with the Designated Safeguarding Lead and needs to be referred to the Multi Agency Safeguarding Hub relevant to that learners address, as soon as possible.

APPENDIX C:

Further information

Female Genital Mutilation
Female Genital Mutilation (FGM) 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. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. Multi-agency statutory guidance on female genital mutilation

- **Indicators** - There is a range of potential indicators that a girl may be at risk of FGM. Warning signs that FGM may be about to take place, or may have already taken place, can be found in the Multi-agency statutory guidance on female genital mutilation. Section 5C of the Female Genital Mutilation Act 2003 (as inserted by section 75 of the Serious Crime Act 2015) gives the Government powers to issue statutory guidance on FGM to relevant persons.
- **Actions** - If staff have a concern, they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Mandatory reporting commenced in October 2015. These procedures remain when dealing with concerns regarding the potential for FGM to take place. Where a VLUK Tutor discovers that an act of FGM appears to have been carried out on a girl who is aged under 18, there is a statutory duty upon that individual to report it to the police.
- **Mandatory Reporting Duty** - From October 2015, Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) placed a statutory duty upon tutors, along with social workers and healthcare professionals, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18.

  Those failing to report such cases face disciplinary sanctions. It is rare for tutors to see visual evidence, and they should not be examining learners, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Unless the tutor has a good reason not to, they consider and discuss any such case with the VLUK's designated safeguarding lead.

Gang and Youth / Serious Violence
Learners who become involved in gangs are at risk of violent crime and as a result of this involvement are deemed vulnerable. Agencies and professionals have a responsibility to safeguard these learners and young people and to prevent further harm both to the young person and their potential victims. Risks associated with gang activity include access to weapons (including firearms), retaliatory violence and territorial violence with other gangs, knife crime, sexual violence, and substance misuse
https://www.gov.uk/government/publications/serious-violence-strategy

Learners are also increasingly being targeted and recruited online using social media. Learners can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CSE and CCE may be applicable to where children are involved in County Lines. Some additional specific indicators that may be present where a learner is criminally exploited through involvement in county lines are those who:

- go missing and are subsequently found in areas away from their home.
- have been the victim or perpetrator of serious violence (e.g., knife crime).

Faith Based Abuse
Our policy recognises the 'National Action Plan to Tackle Abuse linked to faith or belief' which describes this abuse as:

‘not about challenging people’s beliefs, but where beliefs lead to abuse that must not be tolerated. This includes belief in witchcraft, spirit possession, demons or the devil, the evil eye, or djinns, dakini, kindoki, ritual or muti murders and use of fear of the supernatural to make children comply with being trafficked for domestic slavery or sexual exploitation. The beliefs which are not confined to one faith, nationality or ethnic community.’

When this type of abuse is suspected the DSL makes a referral to the relevant MASH Team for support and guidance.
https://www.gov.uk/government/publications/national-action-plan-to-tackle-child-abuse-linked-to-faith-or-belief
Concerns relating to abuse linked to faith or belief should always be considered within the wider safeguarding context. Staff should avoid making assumptions based upon culture, faith or ethnicity and seek advice from the Designated Safeguarding Lead immediately.

Risks Associated with Parent/Carer Mental Health
The majority of Parents who suffer mental ill-health can care for and safeguard their children and/or unborn child. Some parents, however, are unable to meet the needs and ensure the safety of their children.

Our approach is to recognise; seek support; instil preventive factors and monitor. Designated Safeguarding Lead should seek support through the Early Help team but escalate to the local MASH Team if they are concerned that the learner involved is being placed at immediate risk of harm.
Staff should recognise that parental mental ill-health does not in itself indicate that a child is at risk of harm. Any safeguarding assessment should consider the impact upon the learner alongside protective factors, support networks and the family's strengths.
Drugs and Alcohol
Learners may be affected by substance misuse through their own use or through the misuse of parents, carers or other adults within the home. Staff should consider the wider safeguarding implications including neglect, exploitation, criminality and domestic abuse.

Honour-Based Abuse (HBA)and Forced Marriages
Honour-Based Abuse (HBA)and Forced Marriage refers to a collection of practices used to control behaviour within families to protect perceived cultural or religious beliefs and Honour-Based Abuse (HBA)can occur when offenders perceive that a relative has shamed the family or community by breaking their ‘code of honour’. Honour-Based Abuse (HBA)cuts across all cultures and communities: Turkish, Kurdish, Afghani, South Asian, African, Middle Eastern, South, and Eastern European for example. This is not an exhaustive list. Where a culture is heavily male dominated, HBAmay exist. This includes forced marriage, female genital mutilation (FGM), virginity testing and hymenoplasty.

‘A forced marriage is a marriage in which one or both spouses do not (or, in the case of some vulnerable adults, cannot) consent to the marriage and duress is involved. Duress can include physical, psychological, financial, sexual and emotional pressure.’ For more information see:
http://www.fco.gov.uk/en/travel-and-living-abroad/when-things-go-wrong/forced-marriage/

http://www.fco.gov.uk/en/travel-and-living-abroad/when-things-go-wrong/forced-marriage/case-studies/safer-schools-partnership

http://www.karmanirvana.org.uk/

Managing Allegations against staff
The Local Authority Designated Officer for Allegations (LADO) must be told of allegations against adults working with learners within 24 hours. Chairs of Governors should refer to this guidance if there is an allegation against any Senior Leader.

This includes all cases that meet the harms threshold where a person is alleged to have:

- Behaved in a way that has harmed, or may have harmed a learner.
- Possibly committed a criminal offence against, or related to, a learner.
- Behaved towards a learner in a way that indicates they may pose a risk of harm to children.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with learners.

This includes behaviour that may have happened outside off the VLUK Campus, that might make an individual unsuitable to work with learners, and is known as transferable risk. Where appropriate an assessment of

transferable risk to learners with whom the person works should be undertaken. If in doubt seek advice from the relevant local authority designated officer (LADO).

There are two levels of allegation/concern:

- Allegations that may meet the harm threshold (see definition above).
- Allegations/concerns that do not meet the harm threshold – referred to in 2024 guidance as 'low level concerns'.

VLUK should have policies and processes to deal with concerns (including allegations) which do not meet the harm threshold. Concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a learner, parent, or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

It is important that VLUK have appropriate policies and processes in place to manage and record any such concerns and take appropriate action to safeguard children.

'Low Level Concerns' - Creating a culture in which all concerns about adults (including allegations that do not meet the harm threshold) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical.

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working at or on behalf of VLUK may have acted in a way that is inconsistent with staff expectations, including inappropriate conduct outside of work; and does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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

- Being over friendly with learners.
- Having favourites.
- Taking photographs of learners on their mobile phone.
- Engaging with a learner on a one-to-one basis in a secluded area or behind a closed door.
- 'Humiliating learners'.

Such concerns should always be recorded and reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.
The Designated Safeguarding Lead should regularly review low-level concerns collectively to identify patterns, trends or emerging themes which may indicate a wider safeguarding concern.
Suspension will not be an automatic response. Decisions should be based upon an individual risk assessment, advice from the LADO and consideration of all available information.

Preventing Radicalisation
Protecting learners from the risk of radicalisation should be part of VLUK's' wider safeguarding duties and is similar in nature to protecting learners from other forms of harm and abuse. During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer.

The internet and the use of social media has become a major factor in the radicalisation of young people. As with managing other safeguarding risks, staff should be alert to changes in a learner's behaviour which could indicate that they may need help or protection. VLUK staff should use their professional judgement in identifying learners who might be at risk of radicalisation and act proportionately which may include making a referral to the Channel programme
Staff should remain alert to emerging online risks including extremist content generated through artificial intelligence (AI), manipulated media, misinformation, disinformation and online communities promoting harmful ideologies.

VLUK must have regard to statutory PREVENT GUIDANCE issued under section 29 of the CTSA 2015. Paragraphs 57-76 of the Prevent guidance are concerned specifically with a responsibility to the need to prevent people from being drawn into terrorism. ”This duty is known as the Prevent duty. It applies to a wide range of public-facing bodies.

VLUK is expected to assess the risk of learners being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting learners in the area and a specific understanding of how to identify individual learners who may be at risk of radicalisation and what to do to support them. VLUK should have clear procedures in place for protecting children at risk of radicalisation. It is not necessary for VLUK to have distinct policies on implementing the Prevent duty.

Designated Safeguarding Leads and other senior leaders should familiarise themselves with the revised Prevent duty guidance: for England and Wales

The **Prevent** guidance refers to the importance of Prevent awareness training to equip staff to identify learners at risk of being drawn into terrorism and to challenge extremist ideas. VLUK is best placed to assess the training needs of its staff in the light of their assessment of the risk to learners on VLUK campuses of being drawn into terrorism.

As a minimum, however, VLUK should ensure that the Designated Safeguarding Lead, alongside all VLUK Tutors, undertakes Prevent awareness training and are able to provide advice and support to other members of staff on protecting learners from the risk of radicalisation.

VLUK must ensure that learners are safe from terrorist and extremist material when accessing the internet on campus. VLUK should ensure that suitable filtering is in place.

The Department for Education has also published advice on the Prevent duty and is intended to complement the Prevent guidance and signposts other sources of advice and support.
https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty

Channel
DSL staff should understand when it is appropriate to make a referral to the Channel team. 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 VLUK to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual’s engagement with the programme is entirely voluntary at all stages.
Referral decisions should be made in partnership with the Designated Safeguarding Lead and informed by local Prevent and Channel guidance where appropriate.

Child Sexual Exploitation & Child Criminal Exploitation
Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse is in exchange for something the victim needs or wants and/or is to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females and children or adults.

The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual, and it should be noted exploitation. As well as being physical can be facilitated and/or take place online.

Child Sexual Exploitation (CSE)
CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child 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.

CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16- and 17-year-olds who can legally consent to have sex.

It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g., through others copying videos or images they have created and posted on social media).
Staff should recognise that exploitation can affect any learner regardless of gender, ethnicity, disability, sexual orientation or background.

CCE indicators can also be indicators of CSE, as can:

- Children who have older boyfriends or girlfriends; and
- Children who suffer from sexually transmitted infections or become pregnant.

Link: Child sexual exploitation: guide for practitioners

Child Criminal Exploitation (CCE)
While there is still no legal definition of 'Child Criminal Exploitation' or CCE, it is increasingly being recognised as a major factor behind crime in communities across Merseyside and the UK, while also simultaneously victimising vulnerable young people and leaving them at risk of harm.

A simple definition of CCE is: CCE often occurs without the victim being aware that they are being exploited and involves young people being encouraged, cajoled, or threatened to carry out crime for the benefit of others. In return they are offered friendship or peer acceptance, but also cigarettes, drugs (especially cannabis), alcohol or even food and accommodation.

Learners may not recognise that they are being exploited and may appear to be making choices when their behaviour is being controlled through fear, violence, debt bondage, coercion or manipulation.

County Lines
It is a term used to describe gangs, groups or drug networks that supply drugs from urban to suburban areas across the country, including market and coastal towns, using dedicated mobile phone lines or 'deal lines. They exploit children and vulnerable adults to move the drugs and money to and from the urban area, and to store the drugs in local markets. They often use intimidation, violence, and weapons, including knives, corrosives, and firearms.

County Lines is a major, cross-cutting issue involving drugs, violence, gangs, safeguarding, criminal and sexual exploitation, modern slavery, and missing persons; and the response to tackle it involves the police, the National Crime Agency, a wide range of Government departments, local Government agencies and voluntary and community sector organisations.

County Line's activity and the associated violence, drug dealing, and exploitation has a devastating impact on young people, vulnerable adults, and local communities.

Staff should be alert to indicators including:

• unexplained money or expensive items
• multiple mobile phones
• missing episodes
• hotel or taxi use
• unexplained injuries
• carrying weapons
• significant changes in behaviour
• increased secrecy.
Further information can be found here: County Lines exploitation: applying All Our Health
Sexual harassment, violence, harmful sexual behaviours (inc. child on child abuse and 'upskirting')

Sexual violence and sexual harassment
This can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence refers to sexual offences under the Sexual Offences Act 2003, including rape, assault by penetration and sexual assault.

It is important that VLUK is aware of sexual violence and the fact learners can, and sometimes do, abuse their peers in this way. When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of the education campus. When we reference sexual harassment, we do so in the context of child on child, sexual harassment. Sexual harassment is likely to: violate a learner's dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment.

Staff must challenge any form of derogatory and sexualised language or behaviour. Staff should be vigilant to sexualised/aggressive touching/grabbing. DfE guidance situates sexual violence, sexual harassment, and harmful sexual behaviour in the context of developing a whole-school safeguarding culture, where sexual misconduct is seen as unacceptable, and not 'banter' or an inevitable part of growing up.
Staff should never dismiss reports of sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys". Every concern should be taken seriously, recorded and responded to in accordance with this policy.

It should be recognised that these issues are likely to occur, and so VLUK should have procedures in place to deal with them. Groups at particular risk include girls, learners who identify as Lesbian, Gay, Bisexual, Transgender+ (LGBT+), or are perceived by peers to be LGBT+, and pupils with SEND.

We recognise that these learners can be targeted by other learners, so it is vital VLUK provides a safe space for these learners to speak out and share their concerns with members of staff. Learners are protected from 'upskirting', bullying, homophobic and transphobic behaviour, racism, sexism, and other forms of discrimination.

Staff have familiarity with the Equality Act 2010 and the Public Sector Equality Duty (PSED), the Human Rights Act 1998 and recent reforms to the Act and how they apply to safeguarding.

https://www.gov.uk/government/consultations/human-rights-act-reform-a-modern-bill-of-rights/outcome/human-rights-act-reform-a-modern-bill-of-rights-consultation-response

VLUK acknowledges the need to treat everyone equally, with fairness, dignity, and respect. Any discriminatory behaviours are challenged, and learners are supported to understand how to treat others with respect. We also have a statutory duty to report and record any of the above incidents. VLUK must record incidents across the whole spectrum of sexual violence, sexual harassment, and harmful sexualised behaviours so that the organisation can understand the scale of the problem and make appropriate plans to reduce it.

All such incidents should be immediately reported to the Designated Safeguarding Lead (DSL). Victims of harm should be supported by VLUK safeguarding team, and their wishes and feelings considered and that the law on child-on-child abuse is there to protect them, not criminalise them.

The Designated Safeguarding Lead should be familiar with the full guidance from the UK Council for Internet Safety (UKCIS).

Upskirting
'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress, or alarm. It is a criminal offence. Anyone of any gender, can be a victim. The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019.

Consent
Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g.to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal, or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice. Further information about consent can be found here: What is sexual consent?
Consent cannot be assumed and should never be inferred from silence, previous relationships or previous sexual activity.

Online Safety & Remote Learning

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation- technology often provides the platform that facilitates harm. An effective approach to online safety empowers VLUK to protect and educate staff and learners in their use of technology and establishes mechanisms to identify, intervene and escalate any incident where appropriate.

The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- Content: being exposed to illegal, inappropriate, or harmful material.
- Contact: being subjected to harmful online interaction with other users.
- Conduct: personal online behaviour that increases the likelihood of, or causes, harm.
- Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group.

Staff should recognise that online safeguarding risks continue to evolve and include artificial intelligence (AI), deepfake imagery, sextortion, live streaming, anonymous communication platforms and emerging technologies.

There is an Online Safety policy, which covers the use of mobile phones, cameras, and other digital recording devices e.g. i-Pads.

Filters and monitoring - Filtering and monitoring arrangements will be reviewed at least annually and following any significant safeguarding incident. Roles and responsibilities for filtering and monitoring will be clearly defined and appropriate oversight maintained by senior leaders.
The UK Safer Internet Centre has published guidance as to what “appropriate” filtering and monitoring might look like: UK Safer Internet Centre: appropriate filtering and monitoring.

The DfE have published a new set of standards which VLUK follows, these include:

- Identify and assign roles and responsibilities to manage filtering and monitoring systems.
- Review filtering and monitoring provision at least annually.
- Block harmful and inappropriate content without unreasonably impacting teaching and learning.
- Have effective monitoring strategies in place that meet their safeguarding needs

SIGNATORIES



Chief Executive Officer
1st August 2026



Chair of Governors
1st August 2026