

Safeguarding and Child Protection Policy

1. This is the Safeguarding and Child Protection Policy as adopted by the Unloc Leadership Board on Monday 18th September 2023. This policy will be reviewed within a year of this date.
2. The purpose of the policy is to ensure that any child (the legal definition of a child is a person under the age of 18 years) who takes part in all and any activity we organise can do so safely, under appropriate supervision and without fear of harm. In addition, it recognises that members of our team may be in a position to spot that a child has suffered harm elsewhere, in which case we have a responsibility to report our findings.
3. We work within the context of relevant legislation. In particular:
 - The Children Act 1999 (2004) contains obligations to protect children from harm, and to ensure that concerns are fully investigated by the appropriate authorities.
 - The Protection of Children Act 1999 provides the context for us to undertake appropriate background checks on team members who work with children.
 - The Human Rights Act 1998 and the UN Convention on the Rights of the Child lay-out rights for children, and procedures whereby they can challenge infringement of those rights.
 - The Sexual Offences (Amendments) Act 2000 places special constraints on those in a position of trust in relation to children.
 - The Safeguarding Vulnerable Groups Act (2006) and The Protection of Freedoms Act 2012 gives definitions of regulated activities for working with children and vulnerable adults.
 - Working Together to Safeguard Children (guidance document) 2018.
 - Sexual Violence and Sexual Harassment Between Children in Schools and Colleges (guidance document) 2018.
 - Keeping Children Safe in Education (guidance document) September 2023.
4. We actively work to ensure that any bullying behaviour is challenged and ended by working with our partner schools, colleges and other organisations.
5. All activities involving children will be planned and will be appropriate to their needs and/or enthusiasms. In doing such planning we will have regard to the target age range of each activity.
6. We ensure that our commitment to child protection is communicated to all staff and relevant

volunteers. A copy of this policy and the appended Procedures will be given to all staff members as part of their induction, and they will be invited to raise any queries with our Designated Safeguarding Lead.

7. All members of the Unloc team agree and hold joint responsibility for the implementation of this policy at all times.

8. We adhere to the Child Protection Procedures appended to this Policy.

9. The contact details for our Designated Safeguarding Lead's are made publicly available by way of this document:

- Designated Safeguarding Officer: Katie Aris, Programme Manager, katie@unloc.org.uk, 07776 2560064
- Deputy Safeguarding Officer: Tony Shrubsall, Content and Quality Manager, tony@unloc.org.uk, 07918 791155
- Deputy Safeguarding Officer: Ben Dowling, Director of People and Resources, ben@unloc.org.uk, 07918 922361

Make reference to the Authority's local policies and procedures, including our LSCB protocols, practice notes, threshold of needs guide and escalation policy

Safeguarding and Child Protection Procedures

Recruiting staff and volunteers

1. This procedure applies to any director, employee, freelance/contractor or volunteer whose work with Unloc entails delivering services in person or virtually to children.
2. All staff and volunteers who are to have any direct contact with children must undergo a List 99 Check with a clear response in order to work at Unloc.
3. All staff and volunteers who are to have any direct contact with children must undergo an enhanced check through the Disclosure and Barring Scheme (DBS) resulting in no adverse report and no soft data "brown envelope" received from the police.
4. All appointments will be made pending references. No work with children will be undertaken by any appointee until positive references are received in response to a specific question about the appointee's suitability and motivation for working with children.
5. Any DBS checks will be renewed in accordance with Independent Safeguarding Authority guidelines.
6. Further information can be found in Unloc's Safer Recruitment Policy and Procedures document.

Training staff and volunteers

1. Every staff member and volunteer will be provided with guidance on how to spot signs of neglect and physical emotional or sexual abuse. A summary is provided at the end of this document as **Appendix C**.
2. Every staff member and volunteer will have explained to them the procedure for reacting to and reporting concerns about abuse or possible abuse as in **Appendix A**.
3. Every staff member and volunteer will be trained in responding to disclosures or accusations made by a child or an adult.
4. Every staff member and volunteer will undergo online Prevent training as recommended by the Department for Education.
5. Every staff member and volunteer will undergo training on keeping children and themselves safe online including the use of online learning platforms such as Unloc.online and Google Classroom as well as video conferencing platforms such as Google Meet, Microsoft Teams and Zoom.

Child protection concerns

1. Child protection concerns may arise in one of three different settings:
 - a. Where Unloc is invited into a setting wherein other adults continue to take primary responsibility for the welfare of children e.g. when delivering workshops to children in schools.
 - b. Where one or more Unloc staff have the primary responsibility for children e.g. when on a trip elsewhere in the country or on a community based, open access programme.
 - c. Where primary safeguarding responsibilities are shared, such as when working with children through digital means.
2. When a child protection concern is raised in a setting such as those outlined in 1a, the correct course of action is to report it fully and rapidly to the responsible person in the host organisation.
3. When a child protection concern is raised in a setting such as that outlined in 1b or 1c, the staff member(s) who initially came into contact with the concern, incident or disclosure, alongside the Designated Safeguarding Officer, is responsible for keeping a confidential written record of it using our template Child Protection & Safeguarding Record (**Appendix B**) or the digital form available at www.unloc.org.uk/safeguardingform The record will include details of the child's identity, the date and time the concern was raised, and details of evidence (including any statements by the child). All confidential information and data to be kept in a secure location. Papers to be stored centrally and all data kept in line with the requirements of the Data Protection Act and the Information Sharing Protocol.
4. The Designated Safeguarding Officer will, if appropriate (such as when the harm threshold is met), pass the concern onwards to the relevant Local Authority Social Care Information and Assessment Team or, in an emergency, the local police.
5. If the concern relates to the behaviour of the Designated Safeguarding Officer, or the person raising the concern is unhappy with the way the Designated Safeguarding Officer has dealt with a situation, the concern should be referred onwards to the Managing Director, Hayden Taylor, who can be contacted via email: hayden@unloc.org.uk.

6. It is clear that even when Unloc staff do not hold primary responsibility, they still have a safeguarding role as a professional working with children.
7. Where necessary, members of the Unloc team will also follow the Safeguarding policies and procedures, including the relevant local safeguarding children's partnership boards protocols, practice notes, threshold of needs guide and escalation policy of our partners and other local authorities in areas we work. This includes, but is not limited to, the Royal Borough of Kensington and Chelsea.

Allegations or accusations involving a member of staff and/or volunteer

In the event of a sustained or unsustained accusation or allegation involving a member of staff(s) or volunteer(s) that requires further investigation, the following steps will be taken:

1. The staff member(s) or volunteer(s) in question will be suspended immediately with all access to Unloc provided electronic devices and accounts being disabled in order to protect all parties.
2. The Local Authority Designated Officer (LADO) will be informed within one working day of the allegation coming to our attention. The purpose of this initial discussion is for the LADO and Unloc to consider the nature, content and context of the allegation and agree a course of action and to consult police and children's social care as appropriate. This conversation will take place before any investigation or statements are taken and the LADO will provide advice on whether the circumstances meet the threshold to be a safeguarding allegation, a concern or conduct matter. Basic enquiries in line with the LADO procedures may be conducted to establish the facts, to help determine whether there is any foundation to the allegation, being careful not to jeopardise any potential future police investigation. Information is also contained in the LADO notification form, including the following advice. When receiving an allegation:-
 - Treat it seriously and keep an open mind.
 - Do not investigate.
 - Do not make assumptions or offer alternative explanations.
 - Do not promise confidentiality.
 - Record the details using the child/adult's own words.
 - Note time/date/place of incident(s), persons present and what was said.
 - Sign and date the written record.
 - Do not inform the subject if this might place the child at risk of further harm or jeopardise any future investigation.
3. If the allegation or concern meets the threshold for safeguarding, a safety plan will be developed and The Designated Safeguarding Officer(s) at Unloc will conduct a full investigation involving all parties, with the intention of completing the investigation as thoroughly and quickly as possible. Suspension of the staff member(s) or volunteer(s) may be required. A full investigation may include, but is not limited to, contacting and obtaining statements from
 - The staff member(s) or volunteer(s) involved in the allegation/accusation

- Any young people involved
- Any other witnesses to the incident
- Parents/guardians or caregivers of those involved
- Other staff member(s) or volunteer(s)

When dealing with an allegation or concern, Unloc will apply common sense and judgement, deal with allegations quickly, fairly and consistently and provide effective protection for the child(s) and support the person subject to allegation. Wherever possible, the staff member(s) or volunteer(s) will be kept informed about the progress of the investigation.

Please note, The LADO will provide advice and guidance to schools when considering allegations against adults working with children. The LADO's role is not to investigate the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police, children's social care, the school, or a combination of these. The LADO will follow the HIPS safeguarding children procedures manual - section 6.1 Allegations Against Staff or Volunteers [6.1 Allegations Against Staff or Volunteers | Hampshire, Isle of Wight, Portsmouth and Southampton \(hipsprocedures.org.uk\)](https://hipsprocedures.org.uk)

4. The outcome of the investigation will be determined using the following definitions:

- Substantiated: there is sufficient evidence to prove the allegation
- Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- False: There is sufficient evidence to disprove the allegation
- Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.
- Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made

5. At the conclusion of the investigation, the Designated Safeguarding Officer will compile a report to be handed to the Director of People and Resources internally at Unloc who will then either follow the disciplinary procedure as outlined in the relevant policy, liaise with the staff member(s) or volunteer(s) to return them to work at the earliest possible opportunity and/or complete any other relevant follow up actions. The Designated Safeguarding Officer will also complete an Internal Investigation Outcome's form to submit to the LADO.

Behaviour around children

1. All members of Unloc staff and volunteers must adhere to Unloc's code of behaviour for working with children:
 - a. No physical contact may be made with a child, and any initiated by the child should be politely ended at the earliest possible moment.
 - b. One-to-one lone working with a child will take place only when other adults are present in the building. Where possible, this work will take place in a room which has a visibility panel or an open door. No one-to-one working with a child should take place via video conferencing platforms.
 - c. Staff may not provide transport to young people using their personal cars.
 - d. No member of staff or volunteer shall take a child to use the toilet.

- e. Personal relationships with children – including visits to the staff member’s / volunteer’s home, exchanging gifts, lending or borrowing money and any kind of exclusive, secretive or sexual relationship – are not allowed. Any pre-existing relationships e.g. neighbour, niece, nephew must be declared to a manager at the earliest possible time.

Working Digitally

1. All policy and procedures as detailed in this document remain applicable to work involving children and young people undertaken via digital means, whether that be through online portals such as Unloc.online and Google Classroom or through video conferencing platforms such as Zoom, Google Meet and Microsoft Teams. The four Cs as described in Keeping Children Safe In Education (guidance document) September 2023; content, contact, conduct, commerce are properly observed. Appendix D provides answers to the most frequently asked questions.

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Unloc Learning Limited

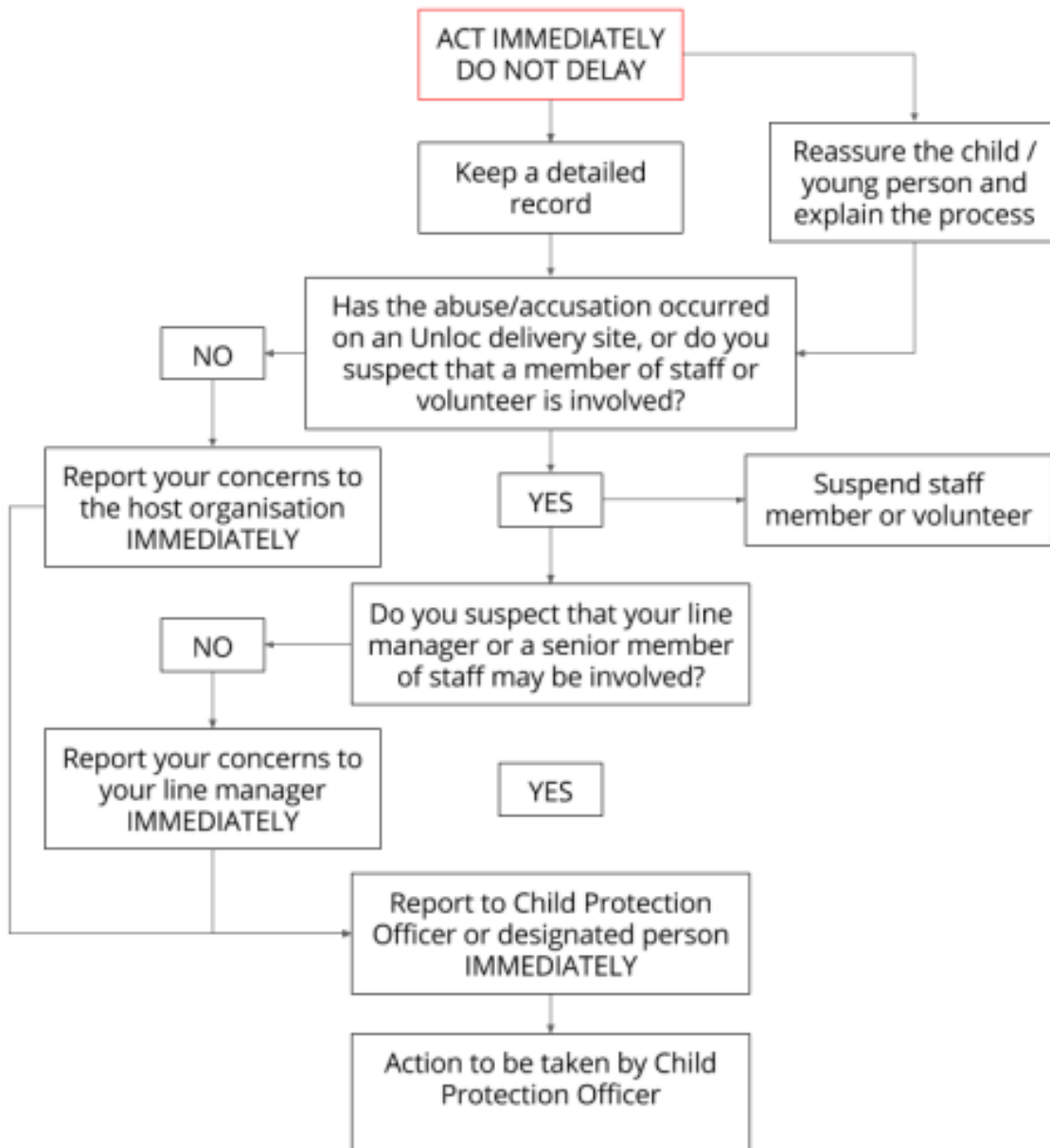
Upper second floor
Portsmouth Guildhall
Guildhall Square
Portsmouth
Hants
PO1 2AB

02392344424

hello@unloc.org.uk

Appendix A

Unloc Child Protection & Safeguarding Procedure Flowchart



Appendix B

Child Protection & Safeguarding Record

To be completed in all cases in the event of an allegation or complaint of child abuse or any event which raises a safeguarding concern whereby an official record needs to be kept.

Details will be strictly confidential and only be accessed by necessary persons, including Social Services and/or the police as appropriate.

Location/Programme: _____

Your name, job role and contact details:

Time and date of incident: _____

Name of Child: _____

Parent/Carer: _____

Address: _____

Telephone: Home _____ Work _____

What type of incident are you recording (tick all that apply):

- Concern about a staff member/volunteer
- Safeguarding Concern
- Safeguarding Disclosure
- Safeguarding Incident
- Report relating to Young Person's Mental Health
- Other (Please Expand)

Full details of concern/incident in a chronological order (include what happened, what was said, where it happened, when did it happen, who was involved?)

Please use the child's own words where possible and state facts of the incident/concern, not opinions

Description of any physical evidence e.g. bruising, bleeding, changed behaviour

Were there any witnesses or anyone else involved?

If so, please include full details

Who has been informed internally at Unloc and externally (if applicable)?

Have the parents/carers been advised? Yes No

Is there any other information you would like to record?

Outcome:

Your Name:

Signed:

Date:

Appendix C: Signs of Abuse

The following may help you decide whether a child's welfare is at risk of abuse, harm or neglect.

Signs which may suggest physical abuse

- Multiple bruising to different parts of the body
- Bruising of different colours indicating repeated injuries
- Fingertip bruising to the chest, back, arms or legs
- Burns of any shape or size
- An injury for which there is no adequate explanation

Signs of possible sexual abuse

- Something a child has told you
- Something a child has told someone else
- A child who shows worrying sexualised behaviour in their play or with other children
- A child who seems to have inappropriate sexual knowledge for their age
- A child who may be visiting or being looked after by a known or suspected sexual offender

Signs which may suggest emotional harm

- Children whose behaviour is excessive. For example, excessive eating, rocking, headbanging.
- Children who self harm. For example, they may cut or scratch themselves or overdose.

- Children who attempt suicide
- Children who persistently run away from home
- Children who show high levels of anxiety, unhappiness or withdrawal
- Children who seek out or avoid affection to an unusual degree.

Signs which may suggest neglect

- Squalid, unhygienic or dangerous home conditions
- Parents who fail to attend to their children's health or development needs
- Children who appear persistently undersized or underweight
- Children who continually appear tired or lacking in energy
- Children who suffer frequent injuries due to lack of supervision

A more detailed briefing can be found on the NSPCC website:

http://www.nspcc.org.uk/inform/research/briefings/signs-of-abuse_wda102204.html

Appendix D: Digital Delivery of Unloc Services

Safeguarding and Data Protection Statement

Unloc.online and other forms of digital delivery (such as Google Classroom and Google Meet) are designed to provide a safe online learning environment in line with Unloc's *Safeguarding and Child Protection Policy and Procedures* and Unloc's *Data Protection Policy and Procedures* which encompass all relevant UK and EU legislation and guidance.

Frequently Asked Questions

Q: Who can see what students are doing/typing? (Unloc.online & Google Classroom)

A: This information is only viewable by Unloc staff, all of whom are appropriately trained and undergo Enhanced DBS Checks, and school/college staff as agreed by the main Point of Contact.

Q: Are students being moderated or monitored at all times? (Unloc.online)

All 'open' written answers are monitored by Unloc staff and individual students may receive brief feedback. Students are not specifically tracked unless directly requested by school/college staff.

Q: What happens if a student types something that is a safeguarding concern? (Unloc.online)

A: Actions are taken in line with usual procedures including informing the school/college. All interactions with students are recorded and can be provided to a school/college if necessary.

Q: What about open access courses? (Unloc.online)

A: Courses which are completely open access do not allow students to give open answers.

Q: Where is students' information kept? (Unloc.online)

A: All information is kept on a secure cloud server based in the EU.

Q: When will user data be deleted? (Unloc.online)

A: All user accounts and their data are deleted at the end of the academic year unless otherwise agreed with the school/college.

Q: What controls are in place to keep students safe? (Google Meet, Microsoft Teams, Zoom)

A: Only people with a specific link can join the calls. The Unloc staff member has the ability to remove or mute participants at any time. Students are reminded of good online etiquette at the start of every call including how to raise an issue directly with the Unloc staff member, how to control the sharing of their



image/video, and how to avoid sharing personal information. Staff are never allowed to be in a digital room alone with a student.