

## **Safeguarding and Child Protection Policy**

1. This is the Safeguarding and Child Protection Policy as adopted by the Unloc Leadership Board on Thursday 30th September 2021. 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 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 2021.
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 Child Protection Officer and 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 Child Protection Officer and Designated Safeguarding Lead are made publicly available by way of this document: Tony Shrubsall, Content & Quality Manager, [tony@unloc.org.uk](mailto:tony@unloc.org.uk), 02394008180 ext. 203.

## **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 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.
  - 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, our Child Protection 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 [unloc.org.uk/safeguardingform](https://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 Child Protection 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 Child Protection Officer, or the person raising the concern is unhappy with the way the Child Protection 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](mailto: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.

### **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 2021; content, contact, conduct, commerce are properly observed. Appendix D provides answers to the most frequently asked questions.

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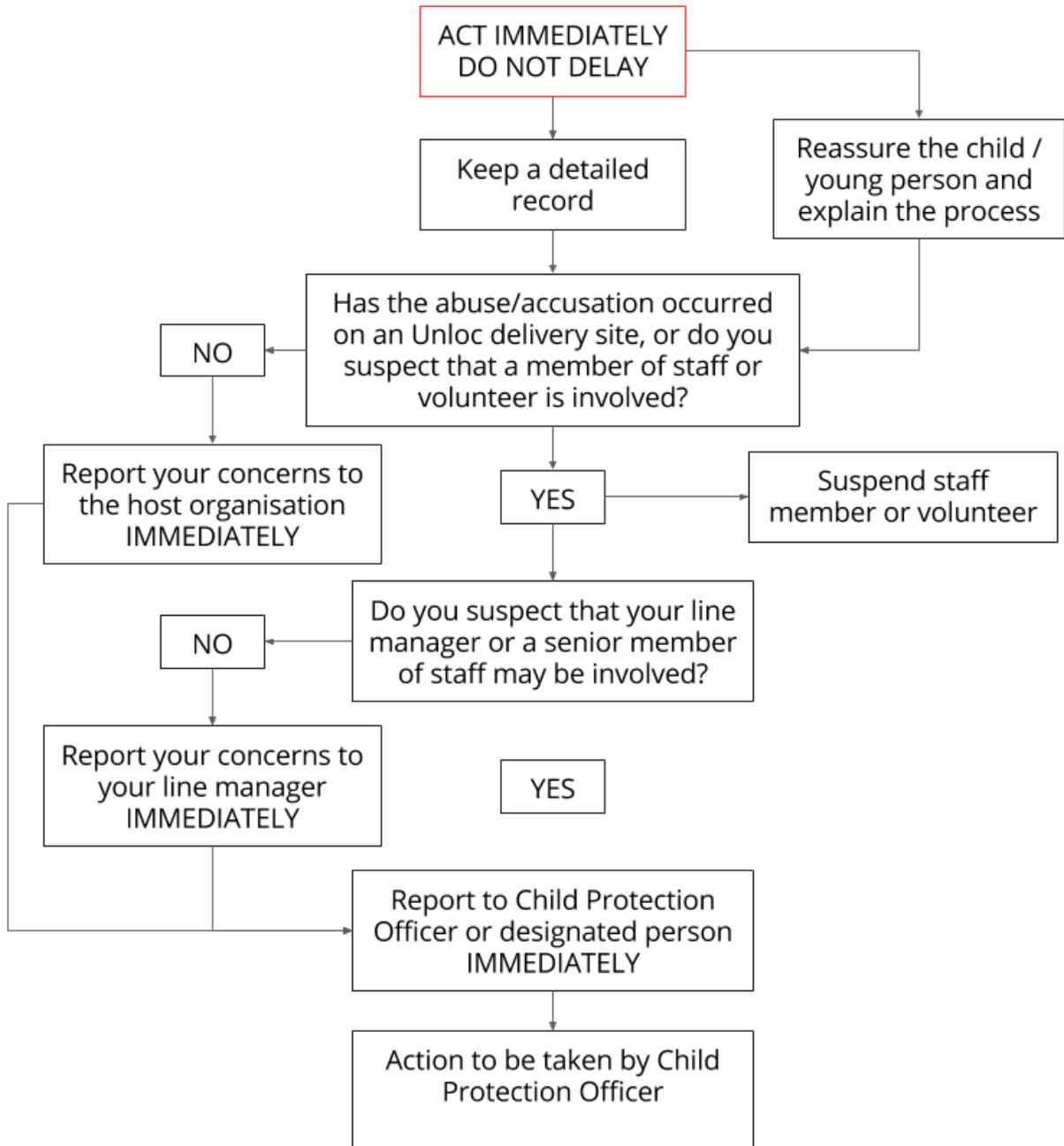
**Unloc Learning Limited**

Portsmouth College  
Taniger Road  
Portsmouth  
PO3 6PZ

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.

Name of Child: \_\_\_\_\_

Parent/Carer: \_\_\_\_\_

Address: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

Telephone: Home \_\_\_\_\_ Work \_\_\_\_\_

Time & Date of the alleged incident \_\_\_\_\_

Record of who was concerned and what is said to have happened / what was seen and by whom

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

What was said by those involved?

Child's description of what took place (using the words the child uses)

Who has been notified?

Time and Date?

Have the parents/carers been advised?

Yes    No

Name of person and position recording details:

Signature, Time and Date

**Outcome:**

## **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](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.