

# Safeguarding policy

This policy applies to the whole of Universify Education's workforce, including volunteers and trustees. This policy is available for parents online, a paper copy and/ or translation is available on request.

This policy is based on:

- Department for Education guidance;
- 'Keeping Children Safe in Education' January 2021;
- 'Working Together to Safeguard Children' July 2018;
- Dealing with Allegations of Abuse against Teachers and Other Staff and the Education (Independent College Standard) (England) Regulations 2010 (as amended)

#### **Universify Education's commitment to Safeguarding**

- 1. Universify Education recognises its responsibility for safeguarding and promoting the welfare of children. Universify Education seek to establish a safe and nurturing environment for all students and staff. Because of the day-to-day contact with children, Universify Education Staff have a responsibility to be vigilant to the outward signs of abuse, and act if they know or suspect that a child is being abused. Safeguarding is the responsibility of everyone within the company that may come into contact with children on the course. Universify Education will apply this policy equally to any child regardless of age, gender, ethnicity, disability, sexuality, faith or belief.
- 2. Universify Education will:
  - a. Uphold a culture of ongoing vigilance towards safeguarding
  - b. Treat safeguarding as everyone's responsibility
  - c. Maintain openness around discussing concerns in the belief that 'it could happen here'
  - d. Ensure students know they can approach any adult at Universify Education and they will receive a consistent, supportive response
  - e. Provide clear procedures and support for reporting concerns and setting acceptable standards of behaviour
- 3. This means that all staff, whether voluntary, seasonal or



permanent, are required to report any safeguarding concerns to a Designated Safeguarding Lead and undertake safeguarding training, as deemed appropriate by Universify Education. We have established and will maintain links with relevant agencies and cooperate as required with enquiries of a child protection nature. We will keep accurate written records of concerns on students even where referral is not appropriate immediately and ensure that all child protection records are kept securely, remain confidential, and separate from the main student file.

- 4. This also means that Universify Education will undertake to follow the specific Local Authority's Safeguarding Children's Board procedures for all locations in which we deliver our courses. In all cases of abuse, or suspected abuse, we acknowledge the statutory obligations placed on us by Section 157 of the 2002 Education Act. We will therefore ensure that this policy and our procedures are consistent with the requirements of:
  - a. Working Together to Safeguard Children (2018)
  - b. Keeping Children Safe in Education (2021)
  - c. Children Act 1989/2004
  - d. Education Act 2002 (S157), including:
    - 1. Safeguarding Vulnerable Groups Act 2006
    - 2. Independent Colleges Regulations 2010 (as amended)
    - 3. Department for Education: 'Safe to Learn' 2010
  - 5. We will review our policy and procedures annually with all changes communicated to staff and we will ensure that we have a designated Member of Staff for safeguarding who has received appropriate training and support for this role. We will also maintain a number of Designated Safeguarding Leads, currently listed as:
    - Alex Whitton (alex.whitton@universifyeducation.com)
    - Bertina Ho (bertina.ho@universifyeducation.com)
  - 6. All staff will have access to requisite training for their role, this includes ensuring that:
    - a. The designated Member of Staff receives updated training (child protection and inter-agency work) every 2 years approved by the OSCB or NSPCC and that this training is disseminated to all others in Universify Education at least every 3 years in line



with statutory requirements.

- b. All staff responsible for the decision on hiring staff who will interact with children have undergone safer recruitment training and abide by our safer recruitment policy.
- c. All staff at all levels have access to training and briefing sessions in safeguarding with refresher training every 3 years.
- d. Seasonal Staff and voluntary Staff who work with children are to be trained in Universify Education's safeguarding procedures. This includes ensuring that:
  - (1) All newly appointed Staff and volunteers will have induction training which includes child protection.
  - (2) All staff are aware that any inappropriate relationship between staff and a participant of any age on the course will result in instant dismissal. In cases where the law is broken, the appropriate authorities shall be involved.
  - (3) All Staff andvolunteers understand their responsibilities in being alert to, and acting appropriately in, cases of abuse or suspected abuse.
  - (4) All staff are aware of their pastoral responsibilities (as outlined in their contracts and job specifications) and that any other type of relationship between a staff member and course participants, regardless of their age (including students aged over 18 years of age), will be deemed inappropriate and shall lead to instant dismissal. Please refer to **Positions of Trust** (paragraph 10).
  - (5) All staff, trustees and volunteers understand that there is a procedure to be followed in dealing with allegations made against teaching and non-teaching staff and volunteers. This procedure must be followed on all occasions (see Department for Education guidance: Dealing with Allegations of Abuse against Teachers and Other Staff



available from the Child Protection Officer).

## Safer Recruitment and Delayed Suitability Checks

- 7. All our staff, whether seasonal or permanent, will be recruited in accordance with our Safer Recruitment Policy, which includes:
  - a. Enhanced DBS checks or (international) a Certificate of Good Conduct from their local police (translated)
  - b. Before employment begins, two validated reference checks which specifically indicate the candidate's suitability to work with vulnerable adults and children under the age of 18.
  - c. Reporting to the Disclosure and Barring Service any person (whether employed, contracted, volunteer or student) whose services are no longer used because they are considered unsuitable to work with children. This will be done within one month of the individual leaving the Company.
  - d. In cases where a member of residential Staff is suspended pending investigation of a child protection nature we will undertake to resolve the investigation as quickly as reasonably possible to enable the member of staff to return. Universify Education may, at our discretion based on the nature of the investigation, provide alternative accommodation

Delayed Suitability Checks where a DBS or equivalent suitability check has been applied for but not yet received for a member of staff. In these cases, the following measures will be taken:

- e. If residential, the member of staff will be accommodated in a part of the facility that students do not access
- f. Unsupervised access to students will not be allowed until a satisfactory check has been obtained
- g. Teachers will only teach with the door open with a DBS'd member of staff present in the room

## **Prevention and Support**

8. We recognise that high self-esteem, confidence,



supportive friends and good lines of communication with a trusted adult helps to safeguard students. Universify will therefore:

- a. Establish and maintain an ethos where children and young people are encouraged to talk and are listened to.
- b. Ensure children know that there are staff whom they can approach if they are worried or in difficulty.

At Universify Education, we respect the students. The atmosphere is one that encourages all students to do their best. We provide opportunities that enable the students to take and make decisions for themselves. We recognise that abuse and neglect can result in underachievement. We strive to ensure that all our children make optimum educational progress.

#### **Student and Staff Ratios**

- 9. In the interests of student and staff welfare, courses will be staffed to support a ratio of:
  - a. 1 staff member to 8 students

The levels are minimum. Also applicable:

- a. never less than 3 residential staff with a 14-16 age group
- b. one qualified first aider as resident with every student group and on every day trip (1:15)

#### **Adult-Child Interaction**

- 10. **Positions of Trust**. Adults who work with children should avoid any conduct which would lead any reasonable person to question their motivation and intentions. Adults working with under-18s are in a Position of Trust; the Sexual Offences Act (2003) states that any person in a position of trust engaged in a sexual activity **of any sort** with students under the age of 18 is **breaking the law** even though the UK legal age of consent is 16.
- 11. **Physical Contact.** There are occasions when it is entirely appropriate for staff to have some physical contact with children but this should always be consistent with their professional role and responsibilities. Physical contact should take place only when it is necessary in relation to a particular activity. It should take place in a safe and open environment, i.e. one easily observed by



others, and be for the minimum time necessary. These situations may include:

- a. When a child is in distress staff should comfort or reassure a child in an age-appropriate way whilst maintaining clear professional boundaries
- b. For restraint and physical intervention if staff have failed to diffuse situations any other way, physical intervention may be used to manage a child's or young person's behaviour if it is necessary to prevent personal injury to the child, other children or an adult, to prevent serious damage to property or in what would reasonably be regarded as exceptional circumstances. When physical intervention is used it should be undertaken in such a way that maintains the safety and dignity of all concerned

First Aid – staff should ensure another member of staff is aware of the action being taken, explain to the student what is happening and record it.

#### Staff should:

- a. Not use physical force as a means of punishment and discipline. The use of unwarranted force may constitute a criminal offence
- b. Not touch a student in any way that could be considered inappropriate
- c. Not indulge in horse-play
- d. Not block the exit or safe passage of a child that is distressed.
- 12. **Behaviour Management.** Staff should not use any form of degrading treatment to punish students. Sarcasm and demeaning or insensitive comments are not acceptable. The use of corporal punishment is not acceptable. Any sanctions or rewards should be in line with the Universify's policy as outlined in the training and the Volunteer Handbook.
- 13. **Fairness**. Staff should exercise care when selecting students for specific activities or privileges to avoid perceptions of favouritism or unfairness. Methods and criteria for selection should always be transparent and subject to scrutiny.
- 14. **Use of appropriate language**. Staff should:
  - a. Not shout at students (except in situations of danger)
  - b. Not swear in the vicinity of or at students
  - c. Not ridicule or bully students
  - d. Not make suggestive remarks or gestures towards



students (or towards colleagues while students are present)

- 15. **Infatuations and Sexual Contact**. Occasionally, a student may develop an infatuation with an adult who works with them. Staff should deal with these situations sensitively and appropriately to maintain the dignity and safety of all concerned. They should remain aware, however, that such infatuations carry a high risk of words or actions being misinterpreted and should therefore make every effort to ensure that their own behaviour is above reproach.
  - a. An adult, who becomes aware that a child or young person is developing an infatuation, should discuss this at the earliest opportunity with the Course Director so appropriate action can be taken to avoid any hurt, distress or embarrassment. There is further guidance in the On-Course Playbook, which is provided to all volunteers.
  - b. All staff should clearly understand the need to maintain appropriate boundaries in their contacts with children. Intimate or sexual relationships between students and staff will be regarded as a grave breach of trust. Allowing or encouraging a relationship to develop in a way which might lead to a sexual relationship is also unacceptable.
  - c. Any sexual activity may be regarded as a criminal offence and **will always** be a matter for disciplinary action. Children are protected by specific legal provisions regardless of whether they consent or not. The sexual activity referred to does not just involve physical contact including penetrative and nonpenetrative acts. It may also include non-contact activities, such as causing children to engage in or watch sexual activity.
  - d. Staff should:
    - a. Not have any form of communication with a child which could be interpreted as sexually suggestive or provocative i.e. verbal comments, letters, notes, electronic mail, phone calls, texts, physical contact
    - b. Not make sexual remarks to, or about, a child
    - c. Not discuss their own sexual relationships with or in the presence of children
- 16. **Appropriate appearance**. Staff should dress in ways that are appropriate to their role and in line with the Universify dress code. Clothing should not be revealing, sexually provocative or give rise to misunderstanding or political/cultural offence.



- 17. **Alcohol, drugs & smoking**. Staff must abide by the alcohol, drugs and smoking policies provided to them in the Volunteer handbook and in their training materials.
  - a. Staff must not have consumed alcohol prior to supervising students or return to houses/colleges under the influence of alcohol which causes their behaviour to be disruptive or makes them a risk to students.
  - b. All Universify Education sites are non-smoking environments. Staff are not permitted to smoke anywhere on any campuses including boarding houses. Students must be informed of the smoking ban and that disciplinary action will be enforced if the ban is ignored.
  - c. Smoking inside a building is a serious matter due to the fire risk and tainting of interior decoration, so this would prompt a final warning as per the disciplinary procedures. Minor infringements can probably be covered by a verbal warning, though repeat offenders will need to be dealt with sternly.
  - d. We need to recognise that in some countries smoking is less of a taboo than in the UK and parents may permit even quite young students to smoke.

    Nevertheless, we have to adhere strictly to our nonsmoking policy for both staff and students as per our agreement with schools/colleges.
  - e. Proven drug taking/buying will result in the staff member being removed immediately from their position. Students proved to have bought/taken drugs will be immediately removed from the course and sent home at the earliest opportunity.
- 18. **Communication with students**. Communication between students and staff, by whatever method, should take place within clear and explicit professional boundaries. This includes the wider use of technology such as mobile phones, text messaging, e-mails, digital cameras, videos, web-cams, websites and blogs. Staff should not share any personal information with a student. They should not request, or respond to, any personal information from the student (during and after the programme) and should ensure that all communications are transparent and open to scrutiny. Therefore staff should:
  - a. only make contact with students for professional reasons
  - b. recognise that messaging is rarely an appropriate



- response to a child in a crisis situation or at risk of harm. It should only be used as a last resort when other forms of communication are not possible direct calling should be the first resort when a student is in a crisis situation or at risk of harm
- c. not use internet or web-based communication channels to send personal messages to a child always have at least a second staff member included in all communications
- 19. **Accommodation.** All staff should note that among the higher-risk times in accommodation settings are the following:
  - a. early morning when students are getting up
  - b. at bedtime/lights out
  - c. during showering, particularly if accommodation is mixed sex
  - d. when students are getting changed for sports activities

In order to minimise risks, staff must adhere to the following, except where doing so may prejudice student safety:

- a. During higher-risk times members of staff must keep to same sex accommodation areas or common areas on the ground floor
- b. No member of staff can go to accommodation areas of the opposite sex after timetabled bedtime, without being accompanied by a same sex staff member
- c. No member of staff may enter a student's bedroom unless the door is kept wide open or unless accompanied by another member of staff
- d. A member of staff must never enter a changing room of the opposite sex
- e. Male/female showers are clearly signposted and must be respected. A member of staff should not go into a showering facility of the opposite sex.

### **Reporting a Concern**

- 20. Students are with Universify Education for usually one week. This limits time for abuse to occur, to be noticed, or to be expressed. We recognise that students who are abused may find it difficult to disclose this to Staff who they have only known for a short while. Therefore, we will do all we can to foster a culture of openness and trust, as well as equipping Staff with the knowledge needed to recognise abuse should it occur.
- 21. It is also possible that students, may feel that their time away



from home is their opportunity to disclose abuse in their lives. In both instances a concern for the student may arise and it is the responsibility of any staff member concerned about a student to voice their concern.

22. It is a requirement of the Children Act (1989) and the National Minimum Standards for Boarding Schools that adults looking after children (those under the age of 18) should be aware of the risks of abuse (by adults or other young people), and take steps to reduce those risks. They should know what to do if they suspect that someone is being physically, sexually, emotionally abused or neglected, or if someone tells them that this happening. This includes physical and sexual abuse that is occurring on site, or to a student of Universify Education at home or offsite.

#### Whistleblowing

- 23. All Staff should be aware of their duty to raise concerns, where they exist, about the attitude or actions of their colleagues. We recognise that students cannot be expected to raise concerns in an environment where staff fail to do so.
- 24. It is noted that the provisions of Section 175 of the Education Act, place a general duty on host university colleges to safeguard and promote the welfare of children in their care and, as such, Staff will adhere to other related College policies, i.e. Behaviour Policy, Anti-bullying Policy, Health and Safety etc.
- 25. As part of their induction training all new Members of Staff at Universify Education are given an explanation of this policy as part of their induction training and the steps that Universify Education will take when concerns are raised by a staff member or a student.

## **Equal Opportunities and Safeguarding**

26. Some students may be vulnerable to an increased risk of abuse. It is important to understand that this increase is always due to societal attitudes and child protection procedures that fail to acknowledge students' diverse circumstances, rather than the individual student's personality, impairment or circumstances. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues, learning disabilities and reluctance on the part of some adults to accept that abuse can occur.



- 27. To ensure that all of students receive equal protection, we will give special consideration to students who are:
  - a. disabled or have special educational needs
  - b. living in a domestic abuse situation
  - c. vulnerable to being bullied, or engaging in bullying
  - d. living in chaotic and unsupportive home situations
  - e. vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion or sexuality
  - f. do not have English as a first language

## **Recognising Abuse**

- 28. There are four categories of abuse to recognise in safeguarding:
  - a. Physical abuse any abuse that causes physical harm.
  - b. Emotional Abuse any abuse causing negative effects on emotional development.
  - c. Sexual Abuse forcing a child to engage in sexual activities, behave in sexually inappropriate ways or by exposing them to sexual activities.
  - d. Neglect persistent failure to meet a child's basic physical and/or psychological needs. This failure can then impair their development and/or physical and mental health.
  - e. For full details of the categories of abuse and what to look out for see Part 1 of <u>Keeping Children</u>
    Safe in Education.

We must also be aware that abuse can be both active and passive, that is to say someone can actively harm a child or they can fail to act to prevent harm to a child.

29. Other forms of abuse include Female Genital Mutilation, trafficking and modern slavery, Peer on peer abuse, Child Sexual Exploitation, Drug Exploitation, forced marriage, Radicalisation and Extremism, Bullying/ Cyberbullying, fabricated or induced illness.

#### **Prevent Policy - Radicalisation and Extremism**

30. Under the Counter Terrorism & Securities Act 2015
Universify Education has a responsibility to have due regard to the



need to prevent people from being radicalised or drawn into terrorism. This initiative is known as PREVENT and it is designed to try and reduce the likelihood of people supporting terrorism or becoming terrorists. It also aims to reduce the risk of radicalisation happening within institutions. 'Prevent' refers to all ages not just students under 18.

- 31. PREVENT Terminology and Responsibility.
  - a. Radicalisation: the act or process of making a person more radical or favouring of extreme or fundamental changes in political, economic or social conditions, institutions or habits of the mind
  - b. Extremism: holding extreme political or religious views which may deny rights to any group or individual. Can be expressed in vocal or active opposition to core British values. Extremism can refer to a range of views, e.g. racism, homophobia, right-wing ideology, any religious extremism.
  - c. Core British Values:
    - a. Democracy
    - b. The rule of law
    - c. Individual liberty
    - d. Mutual respect and tolerance of different faiths or beliefs (compliant with the Equality Act 2010)
  - d. Universify Education meets this responsibility by educating staff in the terminology and the risks. Guidance on how to deal with issues and arising situations is provided in the On-Course Playbook. If any member of staff is concerned that a student is showing signs of becoming radicalised and involved in an organisation which could ultimately harm the student then this needs to be reported centre to the Designated Safeguarding Officer.

## **Handling a Disclosure**

#### Suspecting a student may be at risk of harm

32. There will be occasions when you suspect that a student may be at risk, but you have no quantifiable evidence. In these circumstances, you should try to give the student the opportunity to talk or communicate in their preferred method. The signs you have noticed may be due to a variety of factors, for example, a parent has moved out, a pet has died, a grandparent is very ill. It is fine to ask the student if they are 'okay' or if you can help in any way.

#### If a student discloses to you

33. If a student communicates to you any risks around their



safety or wellbeing you must let them know that you must pass the information on. The point at which you do this is a matter for professional judgement. Never promise confidentiality as we must act with the student's best interests in mind. During your conversation:

- a. Allow them to speak freely
- b. Ask open, non-leading questions
- c. Remain calm with composed reactions
- d. Give reassuring nods or words of comfort
- e. Do not be afraid of silences
- f. Under no circumstances ask investigative questions
- g. At an appropriate time tell the child/young person that in order to help them you must pass the information on
- h. Do not automatically offer any physical touch as comfort
- 34. If the child is in immediate harm you must notify the Designated Safeguarding Lead immediately and failing that contact the local authority. Irrespective of immediate harm, always report the conversation to the Designated Safeguarding Lead. Write up the situation and series of events as soon as possible and seek support if you feel distressed.
- 35. Staff must notify the Designated Safeguarding lead using the contact information outlined at the end of this policy. They must also complete an incident report form to document any concerns or disclosures as soon as possible.
- 36. Following a referral to the Designated Safeguarding lead they will complete a risk assessment of the situation to determine the next steps. The Designated Safeguarding Lead and safeguarding team will then work with the appropriate individuals and organisations, including Universify staff, local authorities, schools, social services and the police to determine the best course of action to safeguard a child and will always seek to act in the best interests of the child. See Reporting safeguarding concerns diagram for more details.

## **Supporting staff**

37. We recognise that Staff who have become involved with a student who has suffered, or is suffering, harm, may find the situation stressful and upsetting. We will support Staff by



providing an opportunity to talk through their anxieties with an HR lead, and/or the Designated Safeguarding Lead and we will seek further support whenever needed.

#### Information sharing

- 38. We recognise that information sharing is crucial to effective safeguarding. We will share the appropriate information with necessary organisations to safeguard students.
- 39. We will pass any safeguarding concerns arising during the programme on to a student's school. We will seek confirmation from schools that they have received this information. Where a concern is ongoing we may also contact the local authority. Where there is the possibility that a child could be at risk of abuse or neglect, Universify Education is required to refer the child to their school, Social Work or the Police, and under these circumstances, the parent/guardian would not normally be contacted first.
- 40. In the case of a serious incident we will inform schools and the student's parents/ guardians, at the earliest possible moment unless doing so would pose a risk to a student. This time will generally be after any local authorities, such as the police, local authority or social services have been consulted.
- 41. Safeguarding information will be kept securely and separate to a student or staff member's personnel file.

#### **Online safety**

- 42. We recognise that the internet and online technologies can pose specific risks to children that come in three main forms
  - a. Content being exposed to illegal or harmful material
  - b. Contact exposure to harmful online interaction, including adverts and adults posing as children
  - c. Conduct –online behaviour that increases the likelihood of harm e.g. bullying or sending explicit images
- 43. All staff receive appropriate training to highlight the risks posed by working online as well as our responsibility to safeguard children online. The staff code of conduct in the Volunteer Handbook outlines expectations of staff working with children online. Failure to follow this code of conduct may result in disciplinary action.
- 44. Our course rules and welcome talk identify the risks our



students face online and outline our online behaviour expectations for all students. Failure to follow this code of conduct may result in disciplinary sanctions.

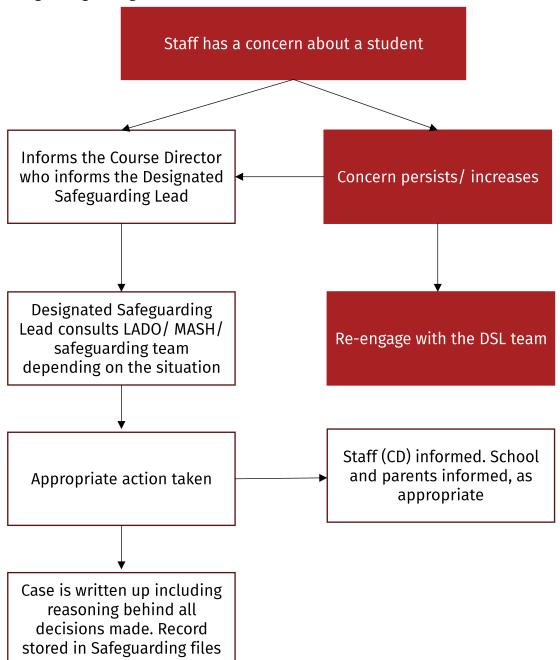
- 45. All online sessions are recorded for the purposes of monitoring.
  - a. Online classes are recorded via Zoom
  - b. Coaching sessions are recorded via Bramble.io
  - c. Two Universify volunteers trained in online safeguarding will be present in all online classes
  - d. Where Zoom breakout rooms are used a staff member will go between breakout rooms to carry out spot checks
  - e. Universify's safeguarding team will carry out spot checks of all recordings, including key word searches for all coaching transcripts
- 46. Risk assessments and appropriate measures are carried out to mitigate risks arising from delivering our programme online. This includes operating waiting rooms, password protecting classes, and limiting access to sessions.

Updated: July 2021

Review: July 2022 (or sooner if required)



#### Raising a safeguarding concern





# Allegation Management Policy

- 1. Universify Education takes all allegations seriously and has a duty of care to any employee or student against whom an allegation has been made, as well as the individual making the allegation. This policy seeks to outline a fair and consistent process by which an allegation may be dealt with quickly, thoroughly and objectively.
- 2. A safeguarding allegation is any information indicating that a member of staff/volunteer/student may have:
  - Behaved in a way that has or may have harmed a child/vulnerable adult.
  - b. Possibly committed a criminal offence against or in relation to a child/vulnerable adult.
  - c. Behaved towards a child or children (or vulnerable adults) in such a way that indicates they would pose a risk of harm if they worked regularly or closely in the future with a child/vulnerable adult.
  - d. Behaves in a way or behaved in a way that indicates they may not be suitable to work with children

## **Making an allegation**

- 3. Anyone including a staff member, student, or member of the public can make an allegation against a member or student of Universify Education. In all cases Universify Education will:
  - a. Take the matter seriously and keep an open mind.
  - b. Not promise confidentiality to the informant.
  - c. Make a written record of the allegation using the informant's words (including time, date and place where the alleged incident took place, what was said and anyone else present; signed and dated).

#### Handling an allegation

4. If an allegation is made against a staff member it should be passed onto the Designated Safeguarding Lead. Where the allegation is against the Designated Safeguarding lead it must be passed onto another Designated Safeguarding Lead. The allegation will then be handled by the Designated Safeguarding Lead in accordance with the rest of this policy and using professional judgement.

#### Investigation

5. When handling an allegation the Designated Safeguarding



Lead will consider if the allegation is about a former member of staff or volunteer, and will contact the police if the child has been harmed (or there may have been intent), needs support, or a crime has been committed. The police and/or child social services should determine next actions.

- 6. If the allegation is about a current member of staff the Designated Safeguarding Lead will contact the Local Authority's Designated Safeguarding Officer to consider the nature, content and context of the allegation and agree on the following:
  - a. What further information is required.
  - b. What immediate action needs to be taken to protect the student.
  - c. When and what should the parents be told.
  - d. Whether suspension of the staff member is necessary.
  - e. Whether the case needs to be referred to the police, social care or if an internal meeting needs to be held to determine next steps.
  - f. Whether there are no further actions.

After consulting the Local Authority Designated Officer the accused should be notified of the allegation, with the amount of detail agreed with the Local Authority Designated Officer. They should be informed of the likely course of action.

- 7. A named person must be appointed within Universify Education to support the accused during any investigation. If further investigation is required the Designated Safeguarding Lead will convene a meeting with the Universify Education Safeguarding team to conduct an investigation and agree next steps. When conducting an investigation the Designated Lead must:
  - a. Maintain confidentiality throughout the process.
  - b. Provide the accused with a full opportunity to answer the allegations.
  - c. Complete the investigation within a month and,
    - (1) If unsubstantiated or malicious within a week;
    - (2) If there is no disciplinary hearing 3 days;
    - (3) If there is a disciplinary hearing within 15 days.

#### Suspension

8. Suspension should happen where behaviour has been intolerable or there has been a disciplinary breach of sufficient weight. This will always be very carefully considered. The individual will inform the person to be suspended as soon as possible in writing and no later than 1 working day of the



decision being made. In all cases, Universify Education will:

- a. Record the decision to suspend, the alternatives considered and why they were not used.
- b. Pair the suspended staff member with a colleague to act as their point of contact throughout the investigation.
- c. Provide support for the staff member if they are returning back to work.
- d. Inform the police if the investigation reveals a crime may have been committed.

#### **Decision**

- 9. To conclude the investigation the Designated Safeguarding Lead must determine the nature of the allegation as either:
  - a. Substantiated sufficient evidence to prove the allegation.
  - b. Malicious deliberate act to deceive and sufficient evidence to disprove the allegation.
  - c. False sufficient evidence to disprove the allegation
  - d. Unsubstantiated insufficient evidence to prove or disprove the allegation

### Dismissal or resignation

10. If the alleged individual resigns or leaves, the allegation must still be followed up and the Disclosure and Barring Service notified if appropriate. Likewise, in the case of dismissal the safeguarding team must decide whether the DBS should be informed.

#### Record keeping

- 11. The allegation, how it was followed up and resolved, and any actions taken must be recorded and shown to the individual against whom the allegation was made. If the allegation is a malicious one it should be removed from any records kept on the individual.
- 12. At the conclusion of all cases the Designated Safeguarding Leads must review the case and whether any improvements can be made to procedures and practices to



prevent a similar occurrence and improve processes.

13. Records of all allegations and investigations are to be kept for 10 years.

#### **Contact sheet**

## **Universify Education Designated Safeguarding Leads**

Alex Whitton (alex.whitton@universifyeducation.com)
Bertina Ho (bertina.ho@universifyeducation.com)

#### **NSPCC**

NSPCC helpline - 0808 800 5000 (24 hours) help@nspcc.org.uk

https://www.nspcc.org.uk/

Childline (for those under 18) - 0800 1111

#### **Online safety**

Professionals Online Safety Helpline - 0344 381 4772 helpline@saferinternet.org.uk



## Oxfordshire Local Authority and safeguarding service

LADO Alison Beasley	Alison.beasley@oxfordshire.gov. uk	01865 815956	07833436649
Safeguarding Co-Ordinators	Contact if the LADO is unreachable		
Donna Crozier	<u>Donna.cozier@oxfordshire.gov.u</u> <u>k</u>	01865 816382	07901331799
Sandra Barratt	Sandra.pasquet@oxfordshire.go v.uk	01865 323457	07785453264
Lorna Berry	Lorna.berry@oxfordshire.gov.uk	01865 895955	07912 474375
LADO team	If you can't reach any of the LADOS team use this contact Lado.safeguardingchilrden@oxf	01865 810603	
Multi-Agency	ordsh ire.gov.uk For all immediate concerns about a	03450507666	
Safeguarding Hub (MASH)	child  Mash- childrens@oxfordshire.gcsx.go	03452412705	
LCSS Central	v.uk For any non-immediate concerns and for no names disclosures LCSS.Central@oxfordshire.gov.u k	33432412703	



## Cambridgeshire Local Authority and Safeguarding services:

LADO <u>lado@cambridgeshire.gov.uk</u> 01223 727 967 (office

hours)

01733 234 724 (emergency)

MASH MASH.C&F@cambridgeshire.gcsx.go 03450455203 (office

<u>v.uk</u>

hours) 01733234724 (out

of hours)

Updated: July 2021

Review: July 2022 (or sooner if required)