

## 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';
- 'Working Together to Safeguard Children' 2023

This policy should be read in conjunction with

- Universify Education [course rules](#)
- Universify's staff code of conduct (found in the Volunteer Handbook)
- Universify's [anti-bullying policy](#)
- Universify's [Whistleblowing policy](#)

## Universify Education's commitment to Safeguarding

1. Universify Education recognises its responsibility for safeguarding and promoting the welfare of children. Universify Education seeks 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 organisation. Universify Education will apply this policy equally to any child regardless of age, gender, ethnicity, disability, sexuality, faith or belief, or any other protected characteristic.

2. Universify Education will:

- a. Uphold a culture of 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 co-operate as required with enquiries of a safeguarding nature. We will keep accurate written records of concerns on students even where referral is not appropriate immediately and ensure that all safeguarding 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. We will therefore ensure that this policy and our procedures are consistent with the requirements of:

- a. Working Together to Safeguard Children (2023)
- b. Keeping Children Safe in Education
- c. Children Act 1989/2004
- d. Education Act 2011 (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. While the Designated Safeguarding Lead, named below, will have overall responsibility for safeguarding within the organization we will also maintain a number of individuals trained to the level of safeguarding leads. These individuals are:

- Designated Safeguarding Lead, Bertina Ho  
([bertina.ho@universifyeducation.com](mailto:bertina.ho@universifyeducation.com))

- Deputy Safeguarding Lead, Zoe Fell  
([zoe.fell@universifyeducation.com](mailto:zoe.fell@universifyeducation.com))
- Deputy Safeguarding Lead, Ella Spilling  
([ella.spilling@universifyeducation.com](mailto:ella.spilling@universifyeducation.com))

6. All staff will have access to requisite training for their role. This includes ensuring that:

- a. All staff at all levels have access to training and briefing sessions in safeguarding every year should changes in practice, guidance or legislation occur
- b. The designated Member of Staff and safeguarding leads receive updated training (child protection and inter-agency work) every 2 years as approved by the Oxfordshire Safeguarding Children Partnership (OSCP) or NSPCC
- c. All staff receive role-specific formal safeguarding training and updates every 3 years or sooner approved by the OSCP or NSPCC
- d. 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. This includes accessing refresher training every 5 years.
- e. 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 safeguarding.
- (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 and volunteers 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 training, the volunteer handbook, course rules, 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 Designated Safeguarding Lead).
- 7. All trustees will receive appropriate safeguarding and child protection (including online) training at induction to equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective. Their training should be updated every 3 years.

## Safer Recruitment and Delayed Suitability Checks

- 8. 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 as soon as possible and where possible within one month of the individual leaving the organisation.
  - 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 outcome. Universify Education may, at our discretion based on the nature of the investigation, provide alternative accommodation
  - e. In any case where an allegation is made against a staff member the Local Authority Designated Officer (LADO) will be contacted in accordance with our Allegation Management policy

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:

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

## Prevention and Support

9. 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.

## Student and Staff Ratios

10. In the interests of student and staff welfare, courses will be staffed to ensure a ratio of:

- a. 1 staff member to 8 students attending the course

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

11. **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.

12. **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. For 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 and recorded immediately using the same process as other safeguarding concerns
- b. 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.

13. **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 training and the Volunteer Handbook.

14. **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.

15. **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 or sexual remarks or gestures towards students (or towards other staff while students are present)
- e. Not use language which may cause offence

16. **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. Allowing or encouraging a relationship to develop in a way which might lead to a sexual relationship is unacceptable.
- c. Any sexual activity is 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 non-penetrative 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

17. **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.

18. **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 on duty must not have consumed alcohol prior to supervising students and should not consume alcohol at any time while on duty.
- b. Staff who are not on duty must not return to houses/colleges under the influence of alcohol which causes their behaviour to be disruptive or makes them a risk to students.
- c. All Universify Education sites are non-smoking environments. Staff are not permitted to smoke anywhere on any campuses including residential buildings. Students must be informed of the smoking ban and that disciplinary action will be enforced if the ban is ignored.
- d. 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.
- 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. In addition, any incidents of student drug possession/taking will be treated as a welfare and safeguarding issue and our safeguarding and referral procedure will be followed.

19. **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, blogs and social media. 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
- d. Only use communication channels that Universify permits staff to use to communicate with students to organize coaching sessions and to communicate during residential programmes

**20. Accommodation.**

- a. Each student is given their own bedroom along a shared corridor. Students are not allowed to enter another student's bedroom or any accommodation building or floor that is not theirs.
- b. Students are asked to indicate which bathroom facilities they would be most comfortable using (male, female, gender neutral) on their onboarding form. Students' bedrooms are arranged along corridors based on students' required bathroom facilities, which may be shared. Wherever possible, students who share the same gender bathroom will be given rooms along corridors which are physically separated (e.g. by stairwells or lockable access doors) from students who use a different gender bathroom. Where bathrooms are not shared (e.g. ensuite accommodation) this may not apply.
- c. Staff are accommodated in the same manner, with separate bathroom facilities from students. Each accommodation section has staff living within it to safeguard students. A greater number of staff are located in gender neutral areas, where students of different genders may be accommodated.
- d. In addition, to enhance the safeguarding of students in high-risk situations, the following processes are in place:
  - a. Night duty is carried out by staff in pairs to ensure all students are in their own bedroom by bedtime. Staff patrol corridors in the hour after bedtime.
  - b. The student code of conduct states that if students are found outside of their own room or in another student's room more than once after curfew, they will be dismissed from the course.

All staff should remain vigilant during unsupervised times such as:

- a. early morning when students are getting up
- b. at bedtime/lights out
- c. during showering
- 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. Members of staff must keep to the accommodation section they have been assigned to or to common areas outside of accommodation areas unless they are accompanied by another member of staff
- b. No member of staff may enter a student's bedroom unless accompanied by another member of staff
- c. Male/female/gender neutral facilities are clearly signposted and must be respected. A member of staff must never go into a bathroom facility of the opposite gender unless in an emergency.

## Reporting a Concern

21. Students are with Universify Education for usually one week. 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, staff will foster a culture of openness and trust. Staff will be equipped with the knowledge needed to recognise abuse should it occur.

22. It is also possible that students may feel that their time away from home is their opportunity to disclose abuse in their lives. A concern for the student may arise and it is the responsibility of every staff member concerned about a student to voice their concern.

23. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.

24. All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and

other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.

25. All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child.

26. 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 is happening.

- a. This includes physical and sexual abuse that is occurring on site, or to a child at home or offsite.
- b. Staff should be aware of additional warning signs of potential abuse including children being absent from education, home or care for prolonged periods and/or on repeat occasions, has experienced multiple suspensions, or is at risk of being permanently excluded from schools.

## Whistleblowing

27. 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.

28. 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 or university policies, i.e. Behaviour Policy, Anti-bullying Policy, Health and Safety etc.

29. 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

30. Universify recognizes that some students may be at increased risk of harm. 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.

31. To ensure that all students receive equal protection, we will give special consideration to students with particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race.

We will also give special consideration to protected characteristics as outlined in the Equality Act.

We also recognise that some students are potentially at a greater risk of harm than others, including children who need a social worker (Children in Need and Child Protection Plans), children who are absent from education, elective home education, children requiring mental health support, looked after children and previously looked after children, care leavers, and children with special educational needs, disabilities or health issues.

## Recognising Abuse, Neglect and Exploitation

32. There are four main 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 [Keeping Children 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. It could also include witnessing ill treatment of others.

33. Other forms of abuse include Female Genital Mutilation, trafficking and modern slavery, Child on child abuse, Child Criminal Exploitation, Child Sexual Exploitation, Drug Exploitation, forced marriage, Radicalisation and Extremism, Bullying/ Cyberbullying, Domestic Abuse, fabricated or induced illness.

## Child on Child abuse

34. Universify acknowledges that children can abuse other children both in person and online and all concerns of child on child abuse should be treated as a safeguarding concern in accordance with this policy and Universify's safeguarding procedures.

35. Child on child abuse could occur in the following forms and will be treated in accordance with Universify's safeguarding policy

- a. Bullying;
- b. Abuse within intimate relationships;
- c. Physical abuse;
- d. Sexual violence and sexual harassment, including harmful sexual behaviour;
- e. upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;

- f. consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery);
- g. Initiation/hazing type violence and rituals

36. Where an incident of sexual harassment or violence occurs and a young person has been harmed this will be referred to children's social services and the police.

37. To ensure a safe environment, Universify staff are also trained to challenge inappropriate behaviours between children that are abusive in nature rather than dismissing certain behaviours as 'banter', ensuring that abuse is never normalised.

## Prevent Policy – Radicalisation and Extremism

38. 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.

- a. 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 to the Designated Safeguarding Lead.

## Handling a Disclosure

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

39. 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

40. 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. 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. The acronym TED (Tell me, Explain to me, Describe to me) is a useful process to follow
- 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

41. If the child is at risk of immediate and/or significant harm you must notify the Designated Safeguarding Lead immediately and failing that contact the local authority (details can be found on the final page of this policy). Irrespective of immediate harm, always report the conversation to the Course Director and Designated Safeguarding Lead. Write up the situation and series of events as soon as possible and seek support if you feel distressed.

42. 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.

43. 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.

44. In cases of sexual violence and sexual abuse, considerations for the initial response will especially include the wishes of the victim in terms of how they want to proceed. This will however need to be balanced with our duty and responsibilities to protect other children.

## Supporting staff

45. 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

46. We recognise that information sharing is crucial to effective safeguarding. We will share the appropriate information with necessary organisations to safeguard students.

47. Data Protection Agreements and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare.

48. Prior to the programme commencing we require and collect contact information for the Designated Safeguarding Lead of each partner school.

49. Prior to the programme commencing we require schools to inform us of any ongoing safeguarding concerns which could impact a student during the programme, including residential and online activities. Universify will email schools ahead of residential to collect this information.

50. 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.



51. In the case of a serious incident or emergency we will inform school Safeguarding Leads and the student's parents/guardians, at the earliest possible moment unless doing so would pose a risk to a student. Schools and parents/guardians will be informed after any local authorities, such as the police, local authority or social services have been informed and consulted.

52. Safeguarding information will be kept securely and separate to a student or staff member's personnel file.

## Online safety

53. We recognise that the internet and online technologies can pose specific risks to children that come in four main forms

- a. Content – being exposed to illegal or harmful material
- b. Contact – exposure to harmful online interaction, including peer to peer pressure, adverts and adults posing as children with the intention to groom or exploit
- c. Conduct – online behaviour that increases the likelihood of harm e.g. bullying or sending explicit images
- d. Commerce – exposure to risks such as online gambling, inappropriate advertising, phishing and or financial scams

54. 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.

55. Our course rules and welcome talk identify the risks our students face online and outline our online behaviour expectations for all students. This includes outlining the online filtering and monitoring systems in place at the university and prohibited content. Failure to follow this code of conduct may result in disciplinary sanctions.

56. If staff become aware of an online safety concern or that a child has accessed or been exposed to harmful content they will follow the procedures outlined in this policy to raise and record a safeguarding concern and support the child.

57. During the residentials, students will not routinely access the internet. For some activities, they will need access to the internet, which

will be provided via host partners' free, public, 'The Cloud' Sky WiFi service. Students are expected to access the internet via the Cloud in line with Sky WiFi's [acceptable use policy](#).

58. Universify will only provide access to the internet via its own servers using staff devices in exceptional circumstances for online coaching sessions which take place during the residential. Students will be supervised closely at all times to ensure appropriate use.

59. To reduce the risk of mobile devices and smart technology being used to harass, bully or control other students, students are asked not to use mobile devices at meal times and to limit use at all other times until they are in private. In addition, students are expected to follow our acceptable use policy, outlined in the course rules, which includes but is not limited to the following:

- a. Not to upload, download or access any materials which are illegal or inappropriate or may cause harm or distress to others
- b. Not to use any programmes or software that might allow you to bypass the filtering/security systems in place to prevent access to such materials
- c. Not taking photos or recording others or distributing this material without prior consent
- d. Not use Generative AI to create false or inappropriate images of others or distributing material without prior consent
- e. To report any unpleasant or inappropriate material or messages
- f. Be polite and responsible when communicating with others and not use strong, aggressive or inappropriate language.

60. 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

Universify's safeguarding team will carry out spot checks of all recordings

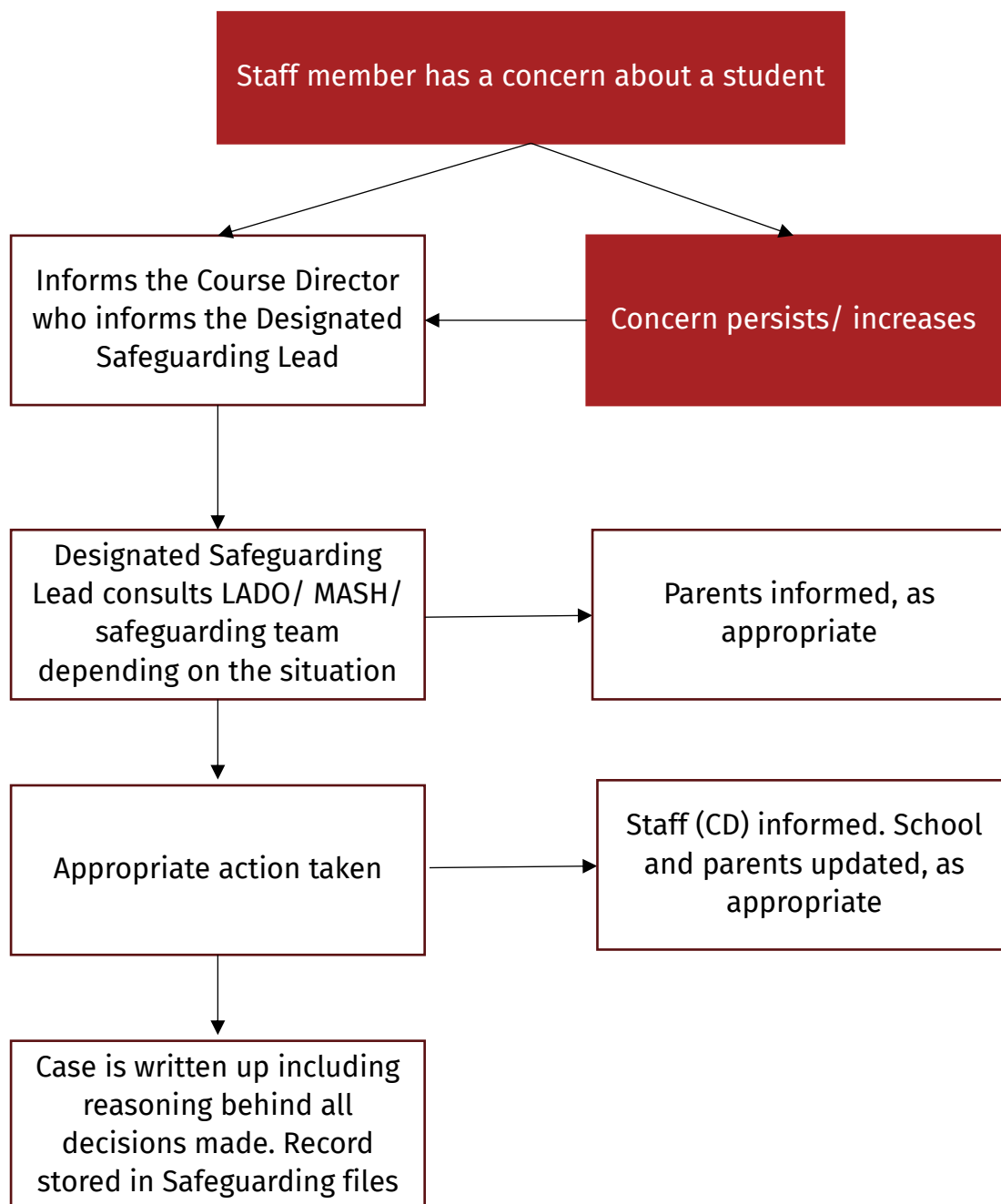
61. Risk assessments and appropriate measures are carried out to mitigate risks arising from delivering any of our programme online. This

includes operating waiting rooms, password protecting classes, and limiting access to sessions.

Updated: December 2026

Review: January 2027 (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:
  - a. 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 Local Authority Designated Officer (LADO) will then be consulted about the allegation and all following actions taken based on the LADO's guidance, 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 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/guardians 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 Safeguarding 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

Designated Safeguarding Lead

- Bertina Ho ([bertina.ho@universifyeducation.com](mailto:bertina.ho@universifyeducation.com))

Deputy Safeguarding Lead

- Zoe Fell ([zoe.fell@universifyeducation.com](mailto:zoe.fell@universifyeducation.com))

Deputy Safeguarding Lead

- Ella Spilling ([ella.spilling@universifyeducation.com](mailto:ella.spilling@universifyeducation.com))

### NSPCC

NSPCC helpline - 0808 800 5000 (24 hours)

[help@nspcc.org.uk](mailto: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](mailto:helpline@saferinternet.org.uk)

## Oxfordshire Local Authority and safeguarding service

LADO team	<a href="mailto:Lado.safeguardingchildren@oxfordshire.gov.uk">Lado.safeguardingchildren@oxfordshire.gov.uk</a>	01865 810603
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Multi-Agency Safeguarding Hub (MASH)	For all immediate concerns about a child	03450507666
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Review: January 2027 (or sooner if required)