The Access Project

Safeguarding and Child Protection Policy and Procedures

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The Access Project: Safeguarding Policy

Contents

1. Introduction and context

The Access Project is committed to safeguarding and promoting the welfare of children and expects all adults within The Access Project to share this commitment.

The Access Project believes that the welfare of children within its care is paramount and that a child or young person should never experience abuse of any kind. We understand that everyone who comes into contact with children has a role to play in safeguarding them, to keep them safe and work in a way that protects them. We recognise that working in partnership with children and their families and carers, as well as other agencies, is essential for promoting children's welfare.

All children have a right to protection from mistreatment, abuse, violence and exploitation. The Access Project will protect all children within its care from abuse equally, regardless of their age, gender, sex, ethnicity, disability, sexuality, religion or beliefs.

1.1. Scope

The purpose of this policy is to protect all children and young people from harm and ensure all children and young people are safe when partaking in The Access Project.

For the purpose of this policy, children are defined as people up to the age of 18.

This policy relates to:
- activities held for children face to face at The Access Project premises and in partner schools
- activities held online, such as in one-to-one sessions, small group sessions, and webinars
- activities for children on the Access Project run or supported by adults representing The Access Project anywhere in the UK or worldwide, or online, such as trips to universities and societies workshops.
- all written, electronic and verbal communication with children by The Access Project.

This policy applies to anyone who works for and volunteers with The Access Project, including all permanent and temporary employees, volunteers, agency workers, interns, contractors, trustees and external service or activity providers.

1.2. Legal framework

This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect children in England. A summary of the key legislation and guidance is available from nspcc.org.uk/childprotection.

1.3 Our policy

The Access Project is committed to:

- Ensuring that all children who are involved with its activities are kept safe from harm and are cared for with the utmost professionalism and integrity.
- Keeping children safe by valuing, listening to and respecting them.
- Appointing a nominated safeguarding lead for children and young people, deputies, and a lead trustee/ board member for safeguarding.
- Adopting child protection and safeguarding best practice through our policies, procedures and code of conduct for adults working with children at The Access Project.
- Providing a safe physical and online environment for all associated with The Access Project.
- Processing data professionally and securely, in line with data protection legislation.
- Informing children involved in activities and their parents about this policy and the associated procedures, including where to go for help if they have any concerns.
- Maintaining a high standard in recruiting staff, tutors and volunteers and conducting necessary checks.
- Providing detailed training on child protection policies, procedures and behavioural codes of conduct, and ongoing supervision and support in following these competently.
- Sharing safeguarding and child protection concerns with relevant agencies by following our procedures.
- Taking any concerns or allegations against adults working with children at The Access Project very seriously and managing these appropriately.
- Creating a culture where adults at The Access Project, children and their families treat each other with respect and are comfortable with sharing concerns.

This policy should be read in conjunction with the following policies, available on request:

- Anti-bullying
- Complaints
- Data protection
- Gift giving
- Health and safety
- Remote communication
- Requests for additional opportunities/ work experience
- Residentials
- Social media
- Trips and events
- Whistleblowing

2. Types of abuse

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults, or another child or children.

There are four types of child abuse as defined in [Keeping Children Safe in Education](#) as follows:

- **Physical abuse**: physical injury to a child where there is knowledge, or a reasonable suspicion, that their injury was inflicted or knowingly not prevented
- **Neglect:** the persistent or severe neglect of a child which results in serious impairment of the child's health or development (both physical and mental)
- **Emotional abuse**: the persistent or severe emotional ill---treatment of a child which has severe adverse effects on the behaviour and emotional development of that child
- **Sexual abuse**: the involvement of dependent, developmentally immature children and adolescents in sexual activities they do not truly comprehend, to which they are unable to give informed consent. This doesn't have to be physical contact, and it can happen online.

Other types of abuse include:

- **Domestic abuse**: witnessing domestic abuse is child abuse, and teenagers can suffer domestic abuse in their relationships
- **Online abuse:** online abuse is any type of abuse that happens on the web, whether through social networks, playing online games or using mobile phones
- **Child sexual exploitation:** child sexual exploitation is a type of sexual abuse in which children are sexually exploited for money, power or status
- **Female genital mutilation (FGM):** FGM is the partial or total removal of external female genitalia for non-medical reasons
- **Bullying and cyberbullying:** bullying can happen anywhere – at school, at

home or online. It's usually repeated over a long period of time and can hurt a child both physically and emotionally
- **Child trafficking:** child trafficking is a type of abuse where children are recruited, moved or transported and then exploited, forced to work or sold
- **Grooming:** children and young people can be groomed online or in the real world, by a stranger or by someone they know - for example a family member, friend or professional
- **Self-abuse**: any means by which a child or young person seeks to harm themselves. This can take lots of physical forms, including cutting, bruising, scratching, hair-pulling, poisoning, overdosing and eating disorders
- **Child-on-child abuse**: abuse of a child by another child. Examples of this include bullying, physical abuse, sexual violence or harassment, upskirting (taking a picture under another person's clothing without consent), sexting and initiation/ hazing violence and rituals. Further information on managing incidents of problematic or harmful peer-on-peer sexual behaviour can be found [here](#)
- **Mental health concerns**: all staff, tutors and volunteers should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. If a mental health concern about a child is also a safeguarding concern, immediate action should be taken, by following this child protection policy and speaking to the designated safeguarding lead or a deputy.
- **Radicalisation**: This can present as extremism, which includes active opposition to fundamental values such as democracy, rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Radicalisation can lead to involvement in terrorism. An individual's susceptibility to radicalisation may be linked to their vulnerability, though it is important to note, not all people susceptible to radicalisation will be vulnerable.

Further information regarding indicators of child abuse can be found [here](#).

3. Safeguarding roles and responsibilities

The Access Project has a legal duty of care to pass on all relevant information regarding any allegations of abuse or identified signs and indicators of possible abuse.

3.1. Adults working and volunteering for The Access Project

All adults working and volunteering for The Access Project are responsible for:

- Complying with the Safeguarding children policy and Code of conduct
- Being alert to the signs of abuse and their need to refer any concerns to the Designated Child Protection Officer
- Raising any concerns with the Designated Child Protection Officer as soon as possible or contacting the police if a child is at immediate risk of harm

- Maintaining an attitude of "it could happen here." When concerned about the welfare of a child, adults working or volunteering for The Access Project should always act in the interests of the child.

3.2. Designated Child Protection Officer

The Access Project has a Designated Child Protection Officer (DCPO) to:

- Offer training and support to adults working or volunteering with The Access Project
- Ensure adults working for or volunteering with The Access Project are vetted in line with safer recruitment procedures
- Ensure all safeguarding concerns and incidents are recorded on the Central Safeguarding Register
- Collect all relevant information on any concerns raised and make decisions on how to proceed, including contacting the Designated Safeguarding Lead (DSL) in the young person's school, or in exceptional circumstances Children's Social Care or the police, who are the investigative agencies.
- Act as the main point of contact with external agencies in the event of an allegation or disclosure. This could include the reporting of significant incidents to the Charity Commission, as outlined here

This will most likely be to It is important to remember that The Access Project staff are not investigating officers. At all times, the welfare of the young person is paramount. Swift reporting will enable the investigative agency to give advice and take appropriate action.

3.3. Trustees

The Board of Trustees holds ultimate accountability for the charity's safeguarding, including:

- Ensuring safeguarding policies, procedures and measures are fit for purpose and up to date
- Making sure everyone in the organisation is aware of their safeguarding responsibilities and knows how to respond to concerns
- Having a lead trustee for safeguarding and child protection
- Challenging any decisions which adversely affect anyone's wellbeing
- Managing allegations of abuse against someone involved in the organisation
- Reporting serious incidents as necessary.

The Board delegates responsibility for this to the DCPO, who makes recommendations to the Board. The Access Project has a designated safeguarding trustee who advocates for safeguarding within the charity and provide supervision as required to staff members.

4. Safeguarding processes and procedures

All staff, tutors and volunteers must follow these procedures as soon as possible in the event of a safeguarding incident or concern arising.

4.1. Responding to a disclosure

If a child or young person discloses information relating to abuse:

- They should be allowed to speak without interruption and encouraged only to disclose information they feel comfortable disclosing. Adults working with young people should be accepting of what is said, should not ask leading questions (often ending in "weren't you", "didn't they" or similar) and should only prompt the child where necessary with open questions – where, when, what, etc.
- Adults working with young people must not promise to keep a secret for a young person - they should advise the young person that they will offer support but must pass on information relating to safeguarding concerns. The young person should be reassured that any information will be kept confidential and only disclosed to relevant people (such as the safeguarding team at The Access Project and DSL at school).
- If the young person refuses to disclose anything more, this decision should be respected and the incident should still be reported
- Adults responding to a disclosure should be mindful to avoid victim blaming when responding to a disclosure - i.e. using any language acting in a way that implies (whether intentionally or unintentionally) that a person is partially or wholly responsible for abuse that has happened to them. Further guidance on this can be found [here](#).
- If a disclosure relates to a nude or semi-nude image of a child, **never view, copy, print, share, store or save the imagery yourself**, or ask a child to share or download imagery. You should immediately report the concern following the guidance in the section below. You can explain about the [Report Remove](#) and [Take It Down](#) tools to the student involved and let them know that they might be able to have their images removed from the internet. Further guidance on responding to concerns about image sharing can be found [here](#).
- Immediately after a disclosure or if a safeguarding incident occurs, the incident must be reported.

4.2. How to report any concerns

Student reporting a concern

If a student on The Access Project wishes to raise a concern, they may speak to their University Access Officer directly, or contact the safeguarding team at stayingsafe@theaccessproject.org.uk

Adult reporting a concern

If an adult at The Access Project has identified any signs or indicators that a child/young person is being abused or if a safeguarding incident has occurred, they should contact the safeguarding team as quickly as possible:

- Known facts should be recorded in writing and sent to the safeguarding team without delay by completing a safeguarding form where possible:
  - A form can be found on the dashboard of the Access Hub – the process for this can be seen in Appendix B.
  - Internal staff can access the forms via a student's record on Salesforce.
  - Anyone wishing to report a concern can also email stayingsafe@theaccessproject.org.uk or call our safeguarding line 020 4513 5999 (Option 1 for safeguarding) – the line is open during term time Monday – Thursday until 7:30pm and Friday until 5:30pm
- The incident should be recorded factually and should include the account provided by the young person, using their exact words where possible.
- For incidents regarding e-safety concerns, follow the steps in this flowchart.

Incidents in schools

If an incident occurs in the school where a University Access Officer is based, they should follow the school's safeguarding procedures for reporting a concern. If the student is a part of The Access Project, they should also inform The Access Project's DCPO.

Safeguarding team response

When a concern is received by the safeguarding team at The Access Project, a member of the team will confirm receipt and request any necessary additional information. Where necessary, the DCPO will liaise directly with the DSL at the partner school and with any relevant external agencies. Safeguarding concerns will be managed and logged on the secure safeguarding section of a student's Salesforce record.

Responding to emergencies

In the event of an emergency, where the child is at immediate risk of harm, adults working with young people should inform the emergency services first and then the DCPO. They can also contact the NSPCC for impartial advice. Contact numbers can be found here in this document

4.3. Confidentiality and handling data

Child protection information will be stored and handled in line with the principles set out in current data protection legislation and The Access Project's Data protection policy (available on request). Our privacy notice outlines how we process the data of young people at The Access Project.

The Data Protection Act (2018) and General Data Protection Regulation (GDPR) does not prevent The Access Project from sharing information with relevant agencies, where that information may help to protect a child.

When dealing with the personal data of young people:

1. All information should be handled with sensitivity and confidentiality
2. The information should be kept securely and not be made available to others without the authority of The Access Project
3. Personal data, particularly relating to under 18s, will be disposed of in a confidential manner, by shredding or deleting it when it is no longer needed
4. Information will not be used inappropriately, especially if it will cause harm to the young person concerned.

Safeguarding concerns are kept on Salesforce in a separate safeguarding file to the general file for each child or adult, which is only accessible to the safeguarding team. The general file is marked to indicate when there is a separate safeguarding file.

Safeguarding files are stored until a child turns 25 years old, and safeguarding files relating to adults are held for 10 years or until the adult reaches retirement age, whichever is longer. They are then deleted unless exempt in accordance with NSPCC guidance.

Individuals have the right to access data held on them by The Access Project. We will always give as much information as we can, however we have to protect other people's privacy. Individuals will not be able to access personal information:

- About someone else unless they have agreed or it's within the law to give access. This includes a parent requesting their child's personal information.
- From another person who gave it in confidence, or where it's confidential

to another person
- That might lead to a child or another person being harmed
- That may be concerned with crime or is protected by legal professional privilege.

To request data held about you by The Access Project, you can send an email to dpo@theaccessproject.org.uk.

5. Safer recruitment

The Access Project will ensure that safer recruitment practices are always followed and that safeguarding considerations are at the centre of each stage of the recruitment process.

All adults working or volunteering at The Access Project must pass the Safeguarding assessments including:
1. Obtaining DBS clearance
2. Two references
3. Providing satisfactory answers to our safeguarding questions.

References should be from individuals who know applicants in a professional or personal capacity, and should:

1. Include one reference from the applicant's most recent employer.
2. For individuals working or volunteering with children, include one reference from previous role working with children, if possible.
3. Not be sought from someone who has a standing relationship with The Access Project i.e. a current employee.
4. Be supplied by Over 18s only.
5. Not be provided by relatives, spouse or significant other
6. Not be provided by former or current students.

For all adults working or volunteering with The Access Project, DBS checks will be undertaken at the level appropriate to their role. Any staff, tutors or volunteers working in regulated activity with young people will be required to undergo an enhanced DBS check with child barred list check. Under no circumstances will we permit an unchecked member of staff, tutor or volunteer to have unsupervised contact with children. Every three years, DBS checks must be refreshed or checked against the DBS update service. Staff, tutors and volunteers will not be permitted to work in regulated activity at The Access Project until these checks have been refreshed.

For paid staff at The Access Project, every interview panel will be overseen by at least two members of staff. For any interviews for school-based members of staff, at least one member of the panel must be trained in safer recruitment. We will check on the identity of candidates, follow up references with referees where

necessary and scrutinise applications for gaps in employment. For our school-based members of staff, we may conduct further checks in line with school procedures, such as overseas checks and qualification checks.

Safeguarding questions form a part of the interview process for staff and tutors, and the volunteer application process for our volunteer tutors. We will record the answers to safeguarding questions asked during the interview process on staff and tutor personnel files and on volunteer records.

Offers of employment and offers to volunteer are made subject to satisfactory vetting checks. If there are any points of clarification, we may also conduct a Risk Assessment for individuals working or volunteering with The Access Project.

6. Training, supervision and running safe activities

It is vital that all adults working with young people on The Access Project are adequately trained in their safeguarding requirements, and that all activities held within the course of The Access Project are conducted safely.

6.1. Training and supervision requirements for adults at The Access Project

All members of staff, tutors and volunteers receive a safeguarding induction and must undertake and pass The Access Project's online Safeguarding children training.

At least one panel member for interviews should have undertaken safer recruitment within the last 3 years. This is a prerequisite for interviews for school-based members of staff.

All staff must complete annual online safeguarding training and bi-annual Prevent Awareness training. Staff members working with young people must attend annual safeguarding training and regular learning and development sessions on safeguarding to keep their knowledge up to date.

Tutors and volunteers at The Access Project must re-complete their online safeguarding training with The Access Project at least every three years and must also attend an online training session. This training covers detailed information necessary for working with The Access Project in addition to this document.

All members of the safeguarding team, including the DCPO and Deputy DCPOs, will undergo updated training for designated leads every two years and their knowledge and skills will be refreshed at least annually through additional safeguarding e-learning. They will also undergo bi-annual Prevent Awareness, Reporting and Channel training.

All staff, tutors and volunteers will receive ongoing safeguarding updates through The Access Project's internal communication platform, staff meetings, volunteer newsletters and email bulletins.

We may from time to time drop into sessions held with young people for quality assurance, safeguarding and feedback purposes. Sessions held online and face to face may be dropped in to, with online sessions viewed in real time or viewed as a recording. We will aim to contact the adult leading the session prior to doing so to confirm which session will be viewed. This is a vital part of ensuring effective delivery, and we reserve the right to conduct a drop-in without prior notice where concerns have been raised.

6.2. Trips and Events

The Access Projects recognises that trips and events, where staff are 'in loco parentis', carry specific risks that need careful mitigation:

- For all events attended by members of The Access Project staff, including society trips, events and A level results day school drop ins, full training will be provided regarding practical safeguarding considerations and the procedures to follow.
- Consent is collected from each parent/guardian before a student is allowed to attend a trip. As a part of this process, parents/guardians are also asked to give information regarding any health conditions that may need additional attention on trips i.e. asthma.
- All trips are risk assessed and approved by the safeguarding team before being allowed to go forwards. Staff are required to read and acknowledge these risks, and staff will be encouraged to dynamically risk assess events and provide feedback to The Access Project.

The internal policies, 'Trips and events policy' and 'Residential policy' give staff further guidance on keeping students safe and well when working offsite.

6.3. Adults offering additional opportunities/ work experience

From time to time, adults working with young people on The Access Project may want to share opportunities with their young people, to support their progression and grow their professional network. It is imperative that this is done with safeguarding first in mind.

No offers of work experience/network sharing should be made without checking with their manager or designated contact at The Access Project, who will ensure the offer is in line with our "Requests for additional opportunities/ work experience policy", or without consulting the Safeguarding team at stayingsafe@theaccessproject.org.uk

7. Allegations

At The Access Project, we recognise the possibility that adults working with our organisation may harm children. It is vital that anyone with concerns about the conduct of a member of staff, tutor, trustee or volunteer that seems inappropriate or unsafe feels able to raise these concerns. Concerns must be listened to fairly and equally with all allegations taken seriously.

Allegations may arise in a number of ways, such as a concern, suspicion, complaint, or report from a child, parent, or another adult within or outside of the organisation.

All allegations raised to The Access Project's DCPO, Chief Operating Officer or Chief Executive will be reported to the Designated Officer(s) of the relevant local authority. It will be up to the Designated Officers to determine whether the reported concerns meet the threshold of an allegation. The Access Project will work with openness and transparency with all agencies as required within Working Together to Safeguard Children, including the DSL of the student's school, children's social care services, and the police.

Further details of the allegations procedure can be seen in our Allegations Policy and Appendix A.

For disclosures relating to serious concerns about any aspect of The Access Project's work, please refer to our Whistleblowing Policy.

8. Prevent Duty

We are aware of the Prevent Duty under Section 26 of the Counter Terrorism and Security Act 2015 to protect young people from being drawn into terrorism and prevent radicalisation

All members of staff have completed Home Office Prevent Awareness Training and the safeguarding team have completed Home Office Prevent Awareness, Referrals and Channel Training. The Access Project employees understand the need for a culture of vigilance to be present in the school to support safeguarding. This includes awareness and sensitivity to changes in the attitudes of pupils, which may indicate they are at risk of radicalisation.

9. Code of conduct

For all adults interacting with young people on the Access Project, you must:

✓ Report any incidents or concerns that a child may be at risk:

- This includes a requirement under the Prevent duty to report if you suspect that a child or adult at risk may be under the influence of radicalisation or extremism
- Report any indications (verbal, written or physical) that suggest a pupil may be infatuated with a member of staff, tutor or volunteer, and always maintain professional boundaries.

✓ Operate within The Access Project's Safeguarding Children Procedures in the event of any disclosure/concern

✓ Encourage young people and adults to feel comfortable enough to point out attitudes or behaviour that are inappropriate

✓ Treat all young people with respect

✓ Only communicate with the young people on the programme in a professional manner

✓ Be sensitive to the needs of young people

✓ Respect a young person's right to personal privacy

✓ Treat all information and data (including photographs and video footage) pertaining to a young person with sensitivity and confidentiality

✓ Avoid being alone with a young person where possible

✓ Remember that someone else might misinterpret your actions, no matter how well intentioned

✓ Be aware that any physical contact with a young person can be misinterpreted and should always be avoided

✓ Recognise that special caution is required when discussing sensitive issues with young people

✓ Complete any attendance records requested for sessions held with young people

You must not:

✗ Engage in, or attempt to engage in, sexual or inappropriate relationships

with a young person on The Access Project

✗ Make suggestive or derogatory remarks in front of young people or via electronic communication

✗ Share personal contact details with a student without express permission from The Access Project.

✗ Communicate with a young person from The Access Project via social media, which includes (but is not limited to) Linkedin, WhatsApp, Instagram, Facebook, Snapchat, or X.

✗ Give special rewards or privileges to build up an inappropriate relationship with a young person. Gifts may only be given and received in line with our Gift Giving guidelines.

✗ Be under the influence of alcohol or other substances when working on activities involving young people

✗ Take photographs of young people without permission from relevant The Access Project staff

✗ Transfer the personal data of young people to third parties without express permission from relevant The Access Project staff

✗ Reveal excessive personal details to a young person from The Access Project (for example, your address)

✗ Either exaggerate or trivialise child abuse issues

✗ Discriminate against or harass a young person or anyone else associated with The Access Project on the basis of that person's age; disability; gender reassignment; marriage or civil partnership; pregnancy or maternity; race; religion or belief; sex; gender; and/or sexual orientation

✗ Rely on your good name or that of the organisation to protect you against any breach of this code.

Any serious breaches may result in a referral being made to the police or the relevant local authority's Designated Officer in line with our Allegations Procedures.

10.   Working with young people online

For all online sessions completed in the name of The Access Project, we will provide:

● Access to a secure designated online platform, only accessible by the

platform provider, staff, tutors, volunteers and students on The Access Project
- Safeguarding training
- Training for The Access Project staff and optional training for tutors and volunteers on how to use the designated online platform
- Training on how staff, tutors and volunteers should conduct themselves in a safe and appropriate manner throughout online sessions
- The safe and limited access storage of all data and recordings generated as a result of online sessions. The Access Project's Data protection privacy notice can be found [here](#)
- A DCPO responsible for supporting all staff, tutors, and volunteers involved in The Access Project's work.

Adults holding sessions online and students attending these sessions consent to the recording and safe storage of online sessions for three months past the date of recording, unless recordings are deemed to be needed for longer by the DCPO. This is for monitoring and safeguarding purposes only.

Adults and students attending online sessions consent to the monitoring of online sessions by The Access Project staff through live drop-in sessions or by watching back session recordings.

Adults who are temporarily based abroad for work or educational purposes may request to continue to hold sessions online for The Access Project during their time abroad. Each request will be individually assessed by The Access Project staff prior to accepting or rejecting the request. Schools also have the right to pause online sessions by adults who are abroad if it conflicts with their own school policies

10.1 Online code of conduct – Adults holding sessions

All adults conducting sessions for The Access Project online are required to adhere to the following code of conduct, and will:

- Only communicate with their students through our online platform unless directed otherwise
- Only conduct sessions via the online platform advised by The Access Project
- Not use personal video platform accounts to hold online sessions (including but not limited to Zoom, Google Meet, Microsoft Teams or Whatsapp)
- Only conduct online sessions with their pupils at the designated times recommended by The Access Project - Monday to Friday, no later than 7pm start, unless otherwise agreed to by The Access Project and parents/ guardians
- Keep online sessions to a reasonable length (typically no longer than 1 hour) and allow for short breaks if required
- Conduct online sessions either in a workplace or location that does not

expose personal information or access to inappropriate background content
- Be fully dressed in appropriate attire, alongside anyone in their household or vicinity
- Use professional and appropriate language at all times, alongside anyone in their household or vicinity
- Remain within the designated online platform for the duration of their sessions
- Not record video, still images or audio of any online sessions or download recordings onto personal devices
- Not take any screenshots of sessions that expose the student or any personal information
- Conduct their sessions without disruption (mobile phones should be set to silent and away from gaze) or supervision by any other persons not approved by The Access Project
- Not share any links to online content or websites that contain anything other than educational resources or further reading/tips that directly link to the content of their sessions
- Report any concerns about safeguarding or child protection of students on The Access Project by following our Safeguarding Processes and Procedures

10.2. Online code of conduct – pupils attending sessions

All schools who partner with The Access Project agree to the following code of conduct for their pupils involved in online sessions:

- Pupils will only receive online sessions at the designated times recommended by The Access Project - Monday to Friday, no later than 7pm start, unless otherwise agreed to by The Access Project
- Pupils who receive online sessions from their home should do so with a parent or guardian supervising.
- Any sessions should be held in appropriate areas of the home, with doors open and a parent/guardian in close proximity during the session
- Pupils and anyone in their household will be fully dressed in smart attire
- Pupils will conduct online sessions in a location that does not expose personal information
- If broadband speed permits, pupils will keep their video stream 'on' for the duration of their sessions
- Pupils will have any mobile phones on silent and out of gaze during sessions
- Pupils will not record video, still images that capture personal information or audio of any sessions or download recordings onto personal devices
- Pupils will not take any screenshots of sessions that expose the adult, other students or any personal information
- Pupils will not share any links to online content or websites that contain anything other than educational resources that directly link to the content of their sessions

10.3. Online code of conduct - Parent/guardian and/or responsible adult (for home-based online sessions)

- Parents/guardians or the named responsible adult of pupils in receipt of home-based online sessions are recommended to supervise their child for the duration of the online session
- Parents/guardians or named responsible adult will support their child with basic IT set up, with support from The Access Project
- Parents/guardians or named responsible adult will support their child to attend and engage in as many online sessions arranged by The Access Project as possible
- Only pupils enrolled on The Access Project's programme may be involved in online sessions with adults at The Access Project
- Parents/guardians or named responsible adult will pass on any concerns about safeguarding immediately to the DCPO through stayingsafe@theaccessproject.org.uk
- Parents/guardians or named responsible adult will, to the best of their ability, ensure a safe, quiet, and appropriate environment for online sessions to take place at home for their child.

11. Working with Young People Face to Face

Face to face sessions with students on The Access Project may only occur with prior direction from The Access Project. To ensure the safety of adults and students working face to face, the following guidelines should be adhered to:

- All face-to-face sessions must happen in a place of work or pre-approved location (e.g. the student's school for UAO provision or a corporate office for volunteering) and will have been agreed with The Access Project in advance of being arranged.
- Adults conducting face to face sessions should ensure there are other people present in the vicinity
- If conducting a face-to-face session, adults should ensure that the meeting takes place in either:
  - ο A communal area in their place of work, e.g. the staff canteen
  - ο An office with other people present.
- If, at their place of work, adults only have the option to carry out a face-to-face session with just the student and adult in the room, they should ensure a colleague is made aware of:
  - ο Where they are conducting the session
  - ο When they are conducting the session
  - ο How long the session is likely to last.

  In this circumstance:
  - ο The adult should, if possible, prop the door ajar (providing this does not contradict other Health and Safety guidance, for example, Fire

> Safety) or hold the meeting in a room that can be seen into (such as a glass meeting room)
> - o Adults should make themselves aware of how to alert colleagues in an emergency.

- Adults should <u>never</u> be working with students at their home, the student's home or any other private residential area (including university halls of residence)
- Adults should not be transporting students one-on-one under any circumstances

Additional information for face-to-face volunteers:

- Sessions should be held during term time Monday to Thursday finishing no later than 7pm, and on Fridays finishing no later than 5pm
- Volunteers must read The Access Project's Risk Assessment for their workplace, which is shared by their employer
- Volunteers can communicate with their student via text message or phone call if they need to communicate with their student at short-notice e.g. if the volunteer (or student) is running late - these messages are for logistical purposes only
- In the first face-to-face session with their student, volunteers should explain the evacuation procedure for the workplace, including what students should do if they are not with the volunteer when told to evacuate
- If a student does not arrive at a scheduled tutorial, volunteers should contact the safeguarding team on the [contact number below](#). This line will only be open until 7:30PM, Monday to Thursday and until 5:30PM on a Friday during term time. Please allow at least 15 minutes for a student to arrive late before leaving the tutorial location.
- In the event of an immediate emergency with their student, volunteers should call the emergency services straight away, then inform the safeguarding team that this action has been taken.

12. Safeguarding contact details

<u>Safeguarding team</u>

Head of Safeguarding and Compliance – Jennifer Guerin
Deputy Safeguarding leads - Penelope Webb, Michaela Wood, Chloe Thacker
Chief Operating Officer – Wikus van de Merwe
Safeguarding Trustee – Andy Burns

Our Safeguarding team can be contacted at:

> E: **stayingsafe@theaccessproject.org.uk**
> T: Head office/ Safeguarding: **020 4513 5999 (Option 1 for safeguarding)**

If you think a child is in immediate danger, call the police on 999 straight away

Contact details for local council children's social services can be found here.
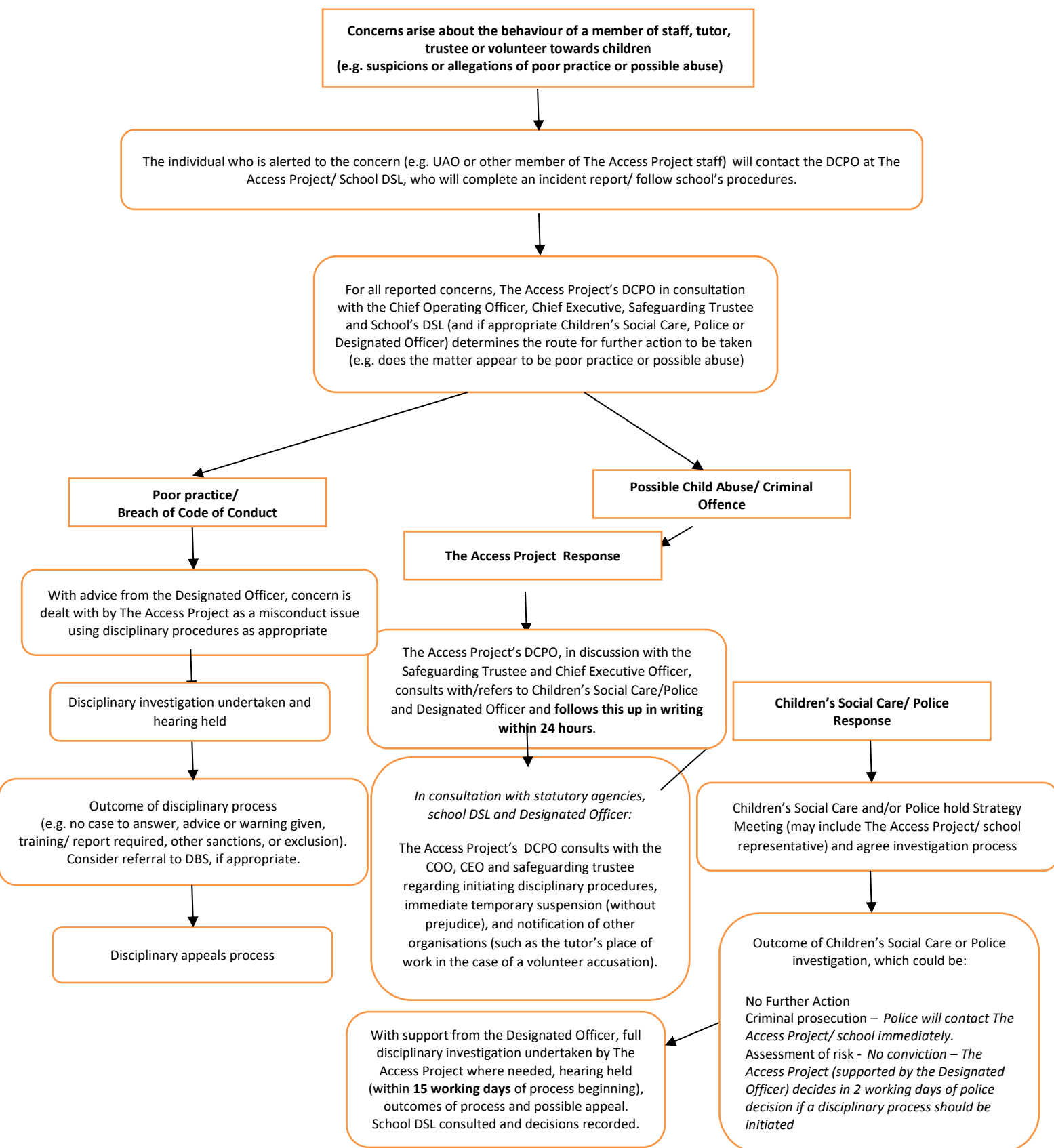
NSPCC helpline: **0808 800 5000**
NSPCC email: **helpline@nspcc.org.uk**
NSPCC website: **www.nspcc.org.uk**

**Children and young people can contact Childline for free on 0800 1111 or visit their website at https://www.childline.org.uk/**

Additional policies from The Access Project are also available on request

Appendix A – Allegations Procedure

**Concerns arise about the behaviour of a member of staff, tutor, trustee or volunteer towards children
(e.g. suspicions or allegations of poor practice or possible abuse)**

The individual who is alerted to the concern (e.g. UAO or other member of The Access Project staff) will contact the DCPO at The Access Project/ School DSL, who will complete an incident report/ follow school's procedures.

For all reported concerns, The Access Project's DCPO in consultation with the Chief Operating Officer, Chief Executive, Safeguarding Trustee and School's DSL (and if appropriate Children's Social Care, Police or Designated Officer) determines the route for further action to be taken (e.g. does the matter appear to be poor practice or possible abuse)

**Poor practice/
Breach of Code of Conduct**

Possible Child Abuse/ Criminal Offence

The Access Project Response

With advice from the Designated Officer, concern is dealt with by The Access Project as a misconduct issue using disciplinary procedures as appropriate

Disciplinary investigation undertaken and hearing held

The Access Project's DCPO, in discussion with the Safeguarding Trustee and Chief Executive Officer, consults with/refers to Children's Social Care/Police and Designated Officer and **follows this up in writing within 24 hours**.

Children's Social Care/ Police Response

Outcome of disciplinary process
(e.g. no case to answer, advice or warning given, training/ report required, other sanctions, or exclusion). Consider referral to DBS, if appropriate.

In consultation with statutory agencies, school DSL and Designated Officer:

The Access Project's DCPO consults with the COO, CEO and safeguarding trustee regarding initiating disciplinary procedures, immediate temporary suspension (without prejudice), and notification of other organisations (such as the tutor's place of work in the case of a volunteer accusation).

Children's Social Care and/or Police hold Strategy Meeting (may include The Access Project/ school representative) and agree investigation process

Disciplinary appeals process

Outcome of Children's Social Care or Police investigation, which could be:

No Further Action
Criminal prosecution – *Police will contact The Access Project/ school immediately.*
Assessment of risk - *No conviction – The Access Project (supported by the Designated Officer) decides in 2 working days of police decision if a disciplinary process should be initiated*

With support from the Designated Officer, full disciplinary investigation undertaken by The Access Project where needed, hearing held (within **15 working days** of process beginning), outcomes of process and possible appeal. School DSL consulted and decisions recorded.

Appendix B - How to report a concern.

1. If you have a safeguarding concern, it's important that you let us know about it and you can do this by completing a Safeguarding form.*
2. To do this, [log into The Access Hub](#)
3. Click on the safeguarding form under the safeguarding section of the dashboard:
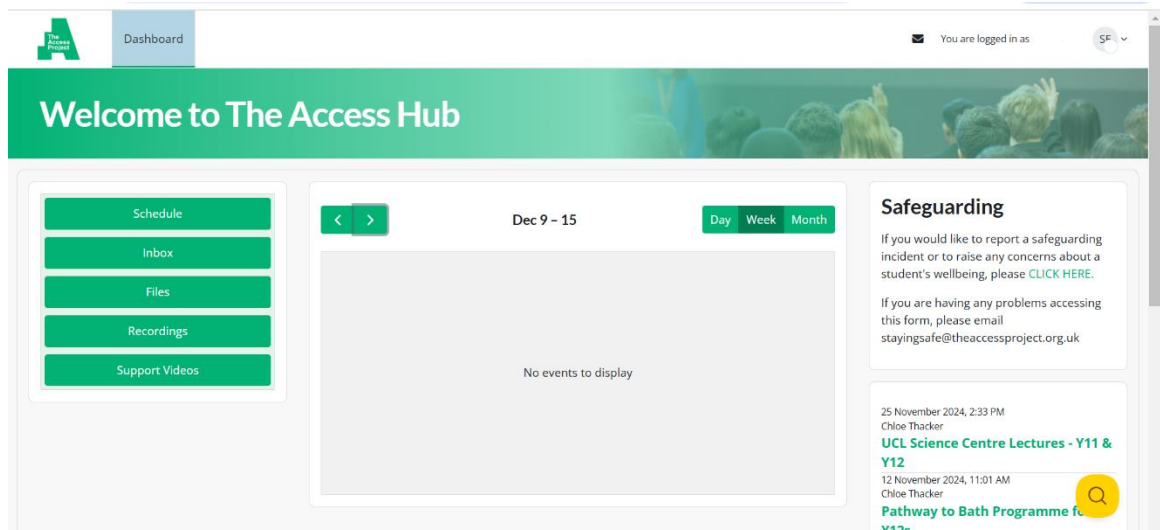
4. This will take you directly to our Safeguarding form. Completing this with plenty of detail will help the Safeguarding Team to manage the concern as best as possible.
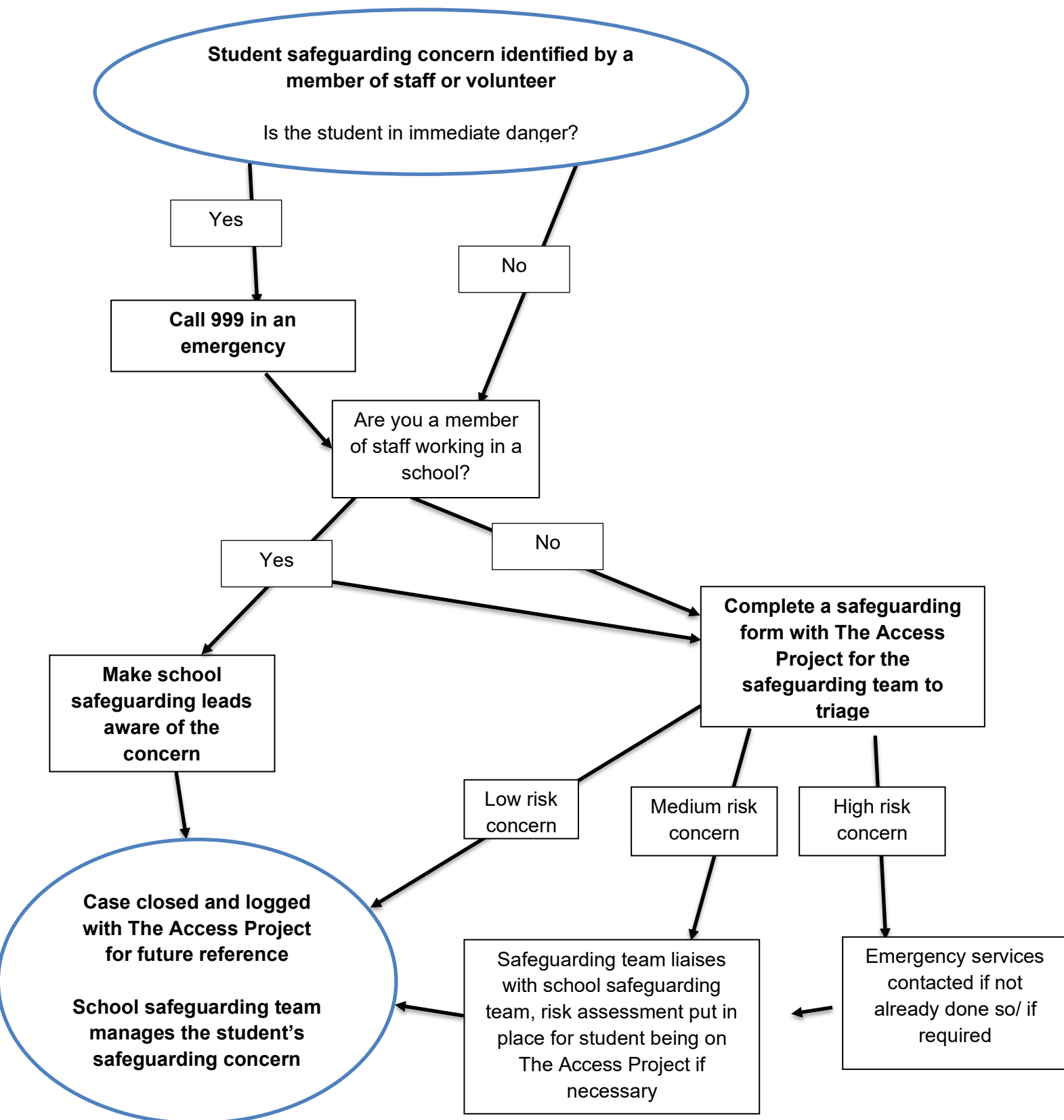

5. When you complete some boxes, you will be given prompts with additional information to help you add the details we need.

What happened/how did the concern arise? *

What action has been taken following the incident/concern? *

Is the student aware at the moment that this incident/concern has been reported? *

Please provide as much information as possible, including specific times, dates and locations of events. You should use factual information only- use exact words spoken if possible. Some things to note could be physical evidence at the time, such as injuries, the emotional state of the student(s) in question or noted changes in behaviour.

X

6. When you submit the form, the safeguarding team will be alerted and will get back to you as soon as possible. You can also always email us at stayingsafe@theaccessproject.org.uk.

Appendix C – Safeguarding Concern - Flowchart

Student safeguarding concern identified by a member of staff or volunteer

Is the student in immediate danger?

Yes

No

Call 999 in an emergency

Are you a member of staff working in a school?

Yes

No

Make school safeguarding leads aware of the concern

Complete a safeguarding form with The Access Project for the safeguarding team to triage

Low risk concern

Medium risk concern

High risk concern

Case closed and logged with The Access Project for future reference

School safeguarding team manages the student's safeguarding concern

Safeguarding team liaises with school safeguarding team, risk assessment put in place for student being on The Access Project if necessary

Emergency services contacted if not already done so/ if required

Appendix D – Report risk matrix

Risk category	The incident/disclosure...
Low	holds no discernible immediate risk to the student, or;
	was fully managed by UAO, reported to school and managed by school safeguarding team
Medium	requires communication between The Access Project safeguarding team and school DSL
	requires a risk assessment to be implemented for a student/ adult
High	must be responded to within one working hour to ensure staff/young person safety – there is significant risk to the student.
	has potential for reputational risk to The Access Project (likelihood of media interest/company fault)
	Is a red rated category.

Red Rated Categories
IMMEDIATE RISK - student has expressed a clear plan to hurt themselves.
IMMEDIATE RISK - student has expressed a clear plan to hurt another person.
IMMEDIATE RISK – student is at immediate risk of harm from someone else