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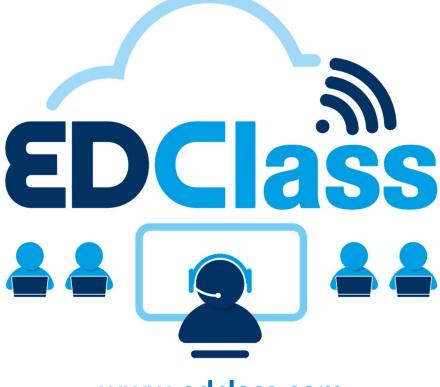


Approved by Sam Warnes

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EDClass Safeguarding Policy



www.edclass.com

Safeguarding & protecting children, young people policy & procedures

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Section 1: Our Aims

EDClass aims to:

- Be an outstanding educational provision that delivers high-quality educational learning, assessment and training to meet the individual needs of students, adapting the core curriculum where appropriate and within the constraints of time and resources.
- Provide blended and flexible training, teaching, learning and assessment that has the learner and educational establishments or clients at the centre of what we do.
- Create a broad, balanced, digital and innovative curriculum that works in partnership with our schools, learners, clients, awarding organisations, learners and staff to help enhance their skills, knowledge and performance.
- ✓ Safeguard and protect all learners that adheres to all government legislation and supervision requirements.
- Provide in-depth, stimulating learning experiences that engage each student and provide appropriate levels of stretch and challenge.
- ✓ Support students' spiritual, moral, social and cultural development.
- Support and encourage healthy lifestyles.
- Provide students with the knowledge and skills required to keep themselves safe at school and in the wider world.

Section 2: Our Objectives

We will achieve this by:

- ✓ Delivering excellent teaching and learning to create a sector specific curriculum.
- Enabling our learners to access flexible, digital and enhanced resources for teaching, delivery, learning and assessments.
- Providing high-quality digital learning and assessment opportunities for our customers, staff and a range of individuals.
- Offer safe, secure, hybrid and personalised learning for each learner that are tailored to their needs, curriculum or assessment criteria.
- Using technology to break down barriers to learning for all learners with good intent via our curriculum and delivery of quality education, assessment and training.



Section 3: Legislation and guidance

This documentation reflects the requirements of the Online Accreditation Scheme 2023; DfE statutory guidance Keeping Children Safe in Education ("KCSIE") 2023; Teaching online safety in schools (2023); and Working together to improve school attendance (2023).

It also reflects requirements for inclusion and equality as set out in the Special Educational Needs and Disability Code of Practice 2014 and Equality Act 2010, and refers to curriculum-related expectations of National Curriculum programmes of study.

We also adhere to the National Curriculum in England, government teaching standards and comply with UK government legislation for both on and off-site alternative provisions for academies; Suspension and permanent exclusion from maintained schools, academies and pupil referral units in England, including pupil movement 2023; Behaviour in schools (2023); and the DfE guidance Working together to improve school attendance document (2023).

Section 4: EDClass Overview

EDClass is a remote learning application designed to help break barriers to learning. EDClass delivers online teaching through UK-qualified teachers and tutors using the personalised e-learning tools to promote a positive attitude towards learning. EDClass offers learners live tutorial support and distance learning provision through a robustly safeguarded and supervised online platform, purposefully built to be flexible in its approach to learners. While also supporting the mental health and wellbeing of learners.

The assessment process and tools, allows the platform to identify knowledge and skill gaps and target the learning journey around each learner's needs.

EDClass allows you to monitor and track the progress of your learners safely and securely online and help positively impact their attainment and attendance

EDClass accommodates all types of learners including SEND students and those struggling to acquire an EHCP. Schools can drastically reduce their workload and time spent searching for solutions for their students who require support as EDClass can help in a quick and efficient manner.

It is a whole business and educational approach to online safety and safeguarding that we pride ourselves on. Our safeguarding policies and procedures fully comply with Keeping Children Safe in Education ("KCSIE") 2023 and we work in partnership with our schools and Multi Academy Trusts to constantly monitor pupils learning, attainment, interactions, engagement, behaviour and attendance in a safe and secure learning environment (Teaching online safety in schools - 2023). Alongside this, we adhere to the SEND and alternative provision improvement plan (2023) and we also follow the guidance with UK government legislation for both on and off-site alternative provisions for academies; Suspension and permanent exclusion from maintained schools, academies and pupil referral units in England, including pupil movement 2022; and Behaviour in schools (2022); and the DfE guidance Working together to improve school attendance document (2022). Therefore, this empowers us to protect and educate pupils, students, and staff in their use of technology and establish mechanisms to identify, intervene in and escalate any concerns where appropriate.



Section 5: Our Approach to Safeguarding and protecting children and young people

Senior Management Responsibilities

Cara Batsford is the Senior Designated Safeguarding Lead for the organisation and will work in line with national legislation and guidance ("KCSIE", 2023 and those previously mentioned) and be responsible to the Managing Director for safeguarding across EDClass.

Safe Recruitment procedures

EDClass has a safer recruitment procedure in place to ensure that we appoint staff that are appropriately qualified and have the skills and knowledge to deliver a quality service. Recruitment is carried out in line with the expectations of 'Keeping children safe in education, (DfE 2023) including enhanced Disclosure Barring Service (DBS) checks.

Please view Section 14: Safer Recruiting Policy

Learning Development & Training on safeguarding and promoting the welfare of children

All staff and volunteers are required to complete mandatory safeguarding induction, consisting of e-learning to be completed within the first week of employment. All managers have to attend risk management training in their first year. Training and any requirements for additional specialist training are recorded and discussed as part of Annual Performance Appraisal.

All staff are trained in dealing with children that are suffering with a wide range of mental health conditions. The teaching team will endeavour to tailor make learning that is appropriate for each child and consider how children that are learning through EDClass can achieve desired outcomes despite having complex needs.

If a child working with EDClass is a Child in Need (CIN), Looked After Child (LAC), Previously Looked After Child (PLAC) or under any section from The Children Act 1989 or on an Education, Health, Care Plan (EHCP), EDClass will be made aware through the registration process of the child onto an EDClass seat. This information is used in order to provide the best possible education and pastoral care to individual students and safeguard them from harm.

EDClass is an affiliate of Operation Encompass. Operation Encompass is a national government hub which acts to train staff, support families and share information through multi agency working for children that are thought to be or who are known to be experiencing domestic violence.

It is the responsibility of the individual, their line manager and the Senior DSL to ensure mandatory training is completed. Supervision sessions and team meetings for all staff are held on a regular basis to discuss safeguarding issues, changes in regulation and best practice.

Purpose

This Policy operates in accordance with national legislation and guidance to safeguard and protect children. See 'Reference' section for further details. It provides clear procedures on:

- Code of Conduct and Professional Boundaries (Please view Section 8: Safeguarding Code of Conduct - for all workers including volunteers; advisers and consultants and view Sections 10, 11, and 12 regarding behaviours at work).
- Behaviours and standards online by staff and students (Please view Sections 10, 11, and 12 regarding behaviours at work and Section 13: Online Safety Policy).
- ✓ Responding to safeguarding/child protection concerns



(Please view Section 15: Safeguarding Procedures).

- ✓ Reporting and managing safeguarding allegations against staff and volunteer
- ✓ Information Sharing

Breaches of this Policy and Procedures could place children at risk of harm and WILL result in disciplinary action.

Staff, volunteers, advisers and consultants are required to refer to relevant national legislation and guidance:

- ✓ July 2018. HM Government: Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children
- ✓ March 2015. HM Government: What to do if you're worried a child is being abused. Advice for practitioners
- ✓ September 2023. Department for Education: Keeping children safe in education. Statutory guidance for schools and colleges.

Scope

This Policy and Procedure

- ✓ Applies to all staff across all of EDClass; Our Volunteers, the Board of Directors, Advisers and Consultants
- ✓ Must be followed alongside the Safeguarding Policy and Procedures of the schools, academy or college that we are working with and Local Children Safeguarding where applicable (and detailed in procedures)
- ✓ All staff, volunteers, Directors and other workers must be made aware of this policy and associated procedures and have access to them in order that we comply with our responsibilities.

NB. At this current time EDClass only currently works with Schools in England



Section 6: Roles and Responsibilities

Accountability Framework:

The Directors have a duty of care, which includes taking necessary steps to safeguard and protect children. They will act in children's best interests and ensure that they take all reasonable steps to prevent any harm to them. Directors also have duties to manage risk and to protect EDClass' assets and reputation.

The Managing Director and the Senior Management Team are the accountable senior managers responsible for the management of safeguarding and serious safeguarding incidents. Cara Batsford is the senior designated safeguarding lead for EDClass.

The Designated Safeguarding Lead has the lead responsibility for safeguarding and child protection issues.

The DSL holds responsibility for the implementation of the Safeguarding and Protecting Children Policy and effective management of safeguarding concerns in each department is also overseen by the manager. Managers hold delegated operational accountability for services. Each department will be supported and overseen by the Designated Safeguarding Lead.

Al IStaff are responsible for all safeguarding and child protection concerns are addressed through respective line management structures in accordance with this Policy and Procedures.

The Safeguarding Advisor is responsible for providing advice and support to Directors and other senior managers on best practice in adhering to this Policy, safer working practices and management of allegations, serious incidents and significant case reviews.

DEFINITIONS

Service User

A child, young person or vulnerable adult using an EDClass resource

Child

- ✓ Children Acts 1989 & 2004 define a child as anyone who has not yet reached their 18th birthday.
- ✓ The United Nations Convention on the Rights of the Child (UNCRC) applies to "all human beings under the age of 18 years unless, under the law applicable to the child, majority is attained earlier."

Safeguarding

Safeguarding children and promoting their welfare means protecting them from maltreatment, preventing impairment of their health and development and ensuring that they grow up in circumstances consistent with the provision of safe and effective care.

Child Protection

Child protection is part of safeguarding and promoting welfare. This action refers to the activity that is undertaken to protect specific children who are suffering, or are at risk of suffering, significant harm, including physical, sexual, emotional abuse and neglect. This includes children affected by: domestic abuse, female genital mutilation, forced marriage, honour-based violence, 'missing' children, young runaways, child sexual exploitation and trafficking.

This list is not exhaustive, and below outlines in further details, some of these (information taken from Department for Education: 'Keeping children safe in education'. 2023)



Abuse

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. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or by another child or children.

Physical abuse

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. (See EDClass Fabricated or induced Illness Policy).

Emotional abuse

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Online Safety Concern

Ensuring the teachers and children accessing the platform is vital. As on online education provider we endeavour to maintain clear high standards of support. This is reflected in the behaviour and sanction document that our teachers use to maintain the principles of education behavioural standards and this is led by Cara Batsford our DSL. Staff have all had necessary checks (Enhanced DBS) and a brought into the business through a safer recruitment process (Please view Section 14: Safer Recruiting Policy). Children are then aware of the expectation within the online environment and the staff are cleared to work. The further training that the staff receive in regards to being able to identify and act on safeguarding concerns even in an online or remote environment.

We also, moving forward, will advise schools to ensure that they review and update their child protection policy to reflect the fact children may be learning both online and in the classroom. As stated throughout this document refer to the KCSIE 2023 there are clear guidelines and further references to documentation for students that are accessing online and remote education.

It is vital that parents, careers and children are effectively communicated with and understand about keeping a safe online working environment and actively encouraged to speak up should they feel any concerns regards anything online.

If there is a need to report anything, all should be aware of clear reporting routes and this should have been made clear from the start.

Please view Section 13 for our Online Safety Policy.

Sexual abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as



masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect:

The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Prevent Concern

Children and young adults can be vulnerable to exposure to or involvement with groups or individuals who advocate intimidation as a means to a political or ideological end. These groups can include those promoting violence from extreme right-wing or other ethnic or religious organisations" Prevent Strategy (2011).

Prevent is part of the Government counter terrorism strategy that aims to stop people becoming terrorists or supporting terrorism. Prevent focuses on all forms of terrorism and extreme ideologies and operates in a precriminal space, providing support and redirection to vulnerable children and adults at risk of being groomed into terrorist activities before any crimes are committed. (See EDClass Prevent Policy).

Please view Section 19 for our Prevent Policy

Trafficking/Modern Day Slavery

The United Nations defines trafficking in people as the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, or abduction, fraud, of deception, of the abuse of power, or of a position of vulnerability, or the giving or receiving of payments to achieve the consent of a person having control over another person, for the purposes of exploitation. (See EDClass Modern Slavery Policy).

A child missing from education

All children, regardless of their circumstances, are entitled to a full-time education, which is suitable to their age, ability, aptitude and any special educational needs they may have. Local authorities have a duty to establish, as far as it is possible to do so, the identity of children of compulsory school age who are missing education in their area. Effective information sharing between parents, schools, colleges and local authorities is critical to ensuring that all children are safe and receiving suitable education.

A child going missing from education is a potential indicator of abuse or neglect and such children are at risk of being victims of harm, exploitation or radicalisation. School and college staff should follow their procedures for unauthorised absence and for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including child sexual exploitation, and to help prevent the risks of going missing in future.

The law requires all schools to have an admission register and, with the exception of schools where all pupils are boarders, an attendance register. All pupils must be placed on both registers. Schools must place pupils on the



admission register at the beginning of the first day on which the school has agreed, or been notified, that the pupil will attend the school. If a pupil fails to attend on the agreed or notified date, the school should consider notifying the local authority at the earliest opportunity to prevent the child from going missing from education.

It is important that the admission register is accurate and kept up to date. Schools should regularly encourage parents to inform them of any changes whenever they occur. This can assist the school and local authority when making enquiries to locate children missing education.

Child sexual exploitation is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online (Please view Section 13: Online Safety Policy). A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point. Some of the following signs may be indicators of sexual exploitation:

- ✓ Children who appear with unexplained gifts or new possessions;
- ✓ Children who associate with other young people involved in exploitation;
- ✓ Children who have older boyfriends or girlfriends;
- ✓ Children who suffer from sexually transmitted infections or become pregnant;
- ✓ Children who suffer from changes in emotional well-being;
- ✓ Children who misuse drugs and alcohol;
- ✓ Children who go missing for periods of time or regularly come home late; and
- ✓ Children who regularly miss school or education or do not take part in education.

Child Criminal Exploitation

Child criminal exploitation is increasingly used to describe this type of exploitation where children are involved, and is defined as:

"Child criminal exploitation is common in county lines and occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18. The victim may have been criminally exploited even if the activity appears consensual. Child criminal exploitation does not always involve physical contact; it can also occur through the use of technology."

Criminal exploitation of children is broader than just county lines, and includes for instance children forced to work on cannabis farms or to commit theft.

County Lines

"County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of "deal line". They are likely to exploit children and vulnerable adults to move and store the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons."

County lines activity and the associated violence, drug dealing and exploitation has a devastating impact on young people, vulnerable adults and local communities.

County lines is a major, cross-cutting issue involving:

- ✓ drugs
- ✓ violence
- ✓ gangs
- ✓ safeguarding

- criminal and sexual exploitation
- ✓ modern slavery
- ✓ missing persons



And the response to tackle it involves:

- ✓ the police
- ✓ the National Crime Agency
- ✓ a wide range of government departments
- ✓ local government agencies
- ✓ VCS (voluntary and community sector) organisations

Like other forms of abuse and exploitation, county lines exploitation:

- ✓ can affect any child or young person (male or female) under the age of 18 years
- ✓ can affect any vulnerable adult over the age of 18 years
- ✓ can still be exploitation even if the activity appears consensual
- ✓ can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence
- ✓ can be perpetrated by individuals or groups, males or females, and young people or adults
- ✓ is typified by some form of power imbalance in favour of those perpetrating the exploitation

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources. One of the key factors found in most cases of county lines exploitation is the presence of some form of exchange (for example, carrying drugs in return for something).

Where it is the victim who is offered, promised or given something they need or want, the exchange can include both tangible (such as money, drugs or clothes) and intangible rewards (such as status, protection or perceived friendship or affection).

It is important to remember the unequal power dynamic within which this exchange occurs and to remember that the receipt of something by a young person or vulnerable adult does not make them any less of a victim. It is also important to note that the prevention of something negative can also fulfil the requirement for exchange, for example a young person who engages in county lines activity to stop someone carrying out a threat to harm his/her family.

The national picture on county lines continues to develop but there are recorded cases of:

- children as young as 8 years old being exploited or moved by gangs to courier drugs out of their local area;
 15-16 years is the most common age range
- ✓ both males and females being exploited
- ✓ white British children being targeted because gangs perceive they are more likely to evade police detection but a person of any ethnicity or nationality may be exploited
- \checkmark the use of social media to make initial contact with children and young people
- ✓ class A drug users being targeted so that gangs can take over their homes (known as 'cuckooing')

We do know that county lines exploitation is widespread, with gangs from big cities including London, Birmingham, Manchester, West Yorkshire and South Yorkshire, and Liverpool operating throughout England, Wales and Scotland.

Gangs are known to target vulnerable children and adults; some of the factors that heighten a person's vulnerability include:

- ✓ having prior experience of neglect, physical and/or sexual abuse
- ✓ lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example)
- ✓ social isolation or social difficulties
- ✓ economic vulnerability
- ✓ homelessness or insecure accommodation status



- \checkmark connections with other people involved in gangs
- ✓ having a physical or learning disability
- ✓ having mental health or substance misuse issues
- ✓ being in care (particularly those in residential care and those with interrupted care histories)
- ✓ being excluded from mainstream education, in particular attending a Pupil Referral Unit

A young person's involvement in county lines activity often leaves signs. A person might exhibit some of these signs, either as a member or as an associate of a gang dealing drugs. Any sudden changes in a person's lifestyle should be discussed with them.

Some potential indicators of county lines involvement and exploitation are listed below, with those at the top of particular concern:

- ✓ persistently going missing from school or home and / or being found out-of-area
- ✓ unexplained acquisition of money, clothes, or mobile phones
- ✓ excessive receipt of texts / phone calls and/or having multiple handsets
- \checkmark relationships with controlling / older individuals or groups
- ✓ leaving home / care without explanation
- ✓ suspicion of physical assault / unexplained injuries
- ✓ parental concerns
- ✓ carrying weapons
- ✓ significant decline in school results / performance
- ✓ gang association or isolation from peers or social networks
- ✓ self-harm or significant changes in emotional well-being

'Honour based' violence

So-called 'honour-based' violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the Designated Safeguarding Lead.

Homelessness

The Designated Safeguarding Lead should be alerted to children living with families who are being made homeless or at risk of becoming homeless as this presents a real risk to the child's welfare by the school.

Indicators that a family may be at risk of homelessness can/may include:

- ✓ Household debt
- ✓ Rent arrears
- ✓ Domestic abuse/Domestic Violence
- ✓ Anti-social behaviour
- ✓ Being asked to leave a property

The Designated Safeguarding Lead should ensure referral routes into the Local Housing Authority are being made by the school so they can raise/progress concerns at the earliest opportunity, however this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

Education settings may also come across cases where 16 and 17-year-old learners may be living independently from their parents or guardians, for example through their exclusion from the family home; these young people will require a different level of intervention and support, led by Children's services, the Designated Safeguarding Lead must ensure the school are aware and are following the correct procedure.

It is the responsibility of the Local Authority to investigate the living and care arrangements and ordinarily a social worker will be assigned since any such child is deemed 'looked after'.

If the private fostering arrangement is deemed appropriate, the child will be placed on EDClass.

Should a privately fostered child be absent for more than 10 consecutive school days, the school will notify the local authority.

Further information can be found through professional organisations such as https://www.nspcc.org.uk/

- ✓ Action on Elder Abuse on 0808 808 8141
- ✓ Mencap Learning Disability Helpline 0808 808 1111
- ✓ VoiceUK 0808 802 8686
- ✓ Respond 0808 808 0700
- ✓ Samaritans 116 123 (FREE)



Section 7: Safeguarding within the platform and organisation

The EDClass platform treats safeguarding as its highest priority. Safeguarding of our young people, teaching staff and staff is paramount. EDClass has an up-to-date GDPR process and this is available on request, however, safeguarding will supersede this at all times and our safeguarding processes are activated when we, as a company or trained individuals, believe there is a concern. We have numerous safeguarding tools in our online Virtual Classrooms, which includes students off-site letting us know how they are on a daily basis, alert mechanisms, video/chat support, marking and various other industry-leading tools. Genuine safeguarding incidents will be documented and sent to schools as and when they occur, and will be communicated via secure email. Also, the video audio files of the learners who have accessed the live streaming facility will be stored and available to the Data Manager and/or IT lead at the trust to access in secure AWS Buckets.

The EDClass system is designed to not allow any unsupervised student to student communication whether in lesson or in message rooms. Students are unable to converse/communicate with each other when accessing the platform.

The student only works with EDClass teaching staff directly via text chat and video/audio stream, and when needed, staff can also access and communicate in these chats live through the observation tool. EDClass is a complete, secure platform that complies with current safeguarding legislation, particularly in relation to provision of a live support, this should include the facility to be provide live tracking and attendance data.

We keep in line with and follow the KCSIE 2023 firstly by ensuring that all our staff are enhanced DBS (including barred) checked and are employed following the 'safer recruitment' process. (Please view Section 14: Safer Recruiting Policy).

Our Senior Safeguarding team are trained at DSL level and have strong relationships with local authorities. Our Senior Safeguarding Team are industry-leading experts and have passed their Designated Safeguarding Lead course, with a strict hierarchy in the processes and reporting system. They have also undertaken the Safeguarding of Vulnerable Adults course.

Any staff at EDClass Limited that work with schools are a minimum of Level 2 in Advanced Child Protection and all staff that communicate with learners are qualified at a minimum of Level 3, Designated Safeguarding Lead. Our teaching staff and HLTAs have thorough checks carried out on them as well as the enhanced DBS checks during the recruitment process.

Training is conducted and maintained by a member of EDClass's Trustee board Milly Wildish (Specialist Arbitrator and National Safeguarding Panel member for Sports Resolution, with 14 years an Inspector in the Metropolitan Police.

Milly has previously worked as a child protection specialist, counter-terrorism officer and has led a Multi-Agency Safeguarding Hub.

The DSL at EDClass Limited is Cara Batsford and if anything is a concern when working with the learners, EDClass staff will report this to the schools named contact or DSL to follow the process as shown later in this documentation. Also, to safeguard and promote the welfare of all of the students who access the platform, all EDClass staff are trained in the following areas:

✓ Prevent

- ✓ Child Sexual Exploitation
- ✓ Prevent Referrals
- ✓ Forged Marriage
- ✓ Female Genital Mutilation



In August 2023, all of our safeguarding staff, teaching team, school account managers and middle management have had further training and professional development on the following areas:

- ✓ Advanced Child Protection
- ✓ Online safety
- ✓ Trauma in Children
- ✓ Mental Health
- ✓ Bipolar
- ✓ OCD
- ✓ Self-Harm
- ✓ LGBTQ+
- ✓ Eating Disorders

- ✓ Schizophrenia
- ✓ Asperger's
- ✓ Sexual Harmful Behaviour
- Depression
- Anxiety
- ✓ Autism
- ✓ ADHD
- Phobias

- ✓ ACT Awareness (Counter Terrorism)
- ✓ Suicide Awareness
- ✓ British Values
- ✓ Personality Disorder
- ✓ Downs Syndrome
- ✓ Working Effectively with Sex Offenders

Safeguarding is our key element. It is mandatory for all EDClass staff to pass all these courses.

The platform is child-centred hosting a support area for learners so they can access external agencies if they feel that they need to. These This currently includes:

- Alcoholics Anonymous help@aamail.org / 0800 9177
 650 / 0845 769 7555
- ✓ FRANK (Drug Advice) frank@talktofrank.com / 0300 123 6600
- ✓ National Debt Line − 0808 808 4000
- NSPCC help@nspcc.org.uk / 0808 800 5000
- ✓ Barnardo's 0208 550 8822
- ✓ Anxiety UK support@anxietyuk.org.uk / 03444 775 774
- ✓ Depression Alliance 0845 123 23 20
- ✓ Beat Eating Disorders help@beateatingdisorders.or g.uk / 0808 801 0677 / 0808 801 0711
- ✓ Samaritans jo@samaritans.org / 116 123
- ✓ Refuge (domestic violence) 0808 2000 247
- ✓ Mind (mental health) supporterservices@mind.org. uk / 0300 123 3393
- Cruse Bereavement Care 0844 477 9400 / 0808 808 1677

- ✓ Rape Crisis rcewinfo@rapecrisis.org.uk / 0808 802 9999
- ✓ Victim Support 0808 168 9111
- ✓ Mencap (learning disabilities)
 − 0808 808 1111
- ✓ Family Lives (Parenting) 0808 800 2222
- ✓ Kidscape (bullying prevention) – info@kidscape.org.uk / 020 7730 3300
- ✓ Relate 0300 100 1234
- ✓ NSPCC FGM Helpline 0800 028 3550
- ✓ Shelter info@shelter.org.uk
 / 0808 800 4444
- ✓ Childline 020 7825 2505
- ✓ CEOP Child Protection and Online Exploitation – 0870 000 3344
- ✓ National Citizens Advice 03444 111 444
- ✓ National Emergency Services
 − 999 / 111 / 101
- National Stop Smoking 01200 405 022
- ✓ Counter Terrorism Hotline 0800 789 321

- ✓ IWF Internet Watch
 Foundation +44 (0) 1223 20
 30 30
- ✓ London Grid for Learning 020 82 555 555
- ✓ Children in England info@childrenengland.org.uk
 / 020 7833 3319
- ✓ UKCCIS UK Council for Child Internet Safety – ukccis.secretariat@culture.go v.uk
- ✓ Safe! –
 safe@safeproject.org.uk /
 0800 133 7938
- ✓ Childnet International info@childnet.com / +44 (0) 20 7939 6967
- ✓ UK Safer Internet Centre enquiries@saferinternet.org. uk / 0344 800 2382
- ✓ Save the Children supportercare@savethechildr en.org.uk / +44 (0) 20 7012 6400
- ✓ Educate Against Hate counter.extremism@educati on.gov.uk / 020 7340 7264



Keeping in line with; Working Together to Safeguard Children. Further links for local support can be added if requested).

Also, learners who access the platform can have access to the following learning content, should the multi academy trust or individual academy allow permission for it in order to support their needs should they choose to access it:

- ✓ Am I Depressed?
- ✓ Am I Vulnerable?
- ✓ Do I Have an Eating Disorder?
- ✓ Do I Have a Generalised Anxiety Disorder?
- ✓ British Values

- ✓ CSE for Students
- ✓ FGM for Students
- ✓ Forced Marriage for Students
- ✓ Gangs & County Lines for Students
- ✓ Keeping Safe Online

- ✓ Extremism and Prevent for Students
- Please note this is a sample set of the lessons available.

As safeguarding students is the responsibility of all, we also ensure that the platform hosts a 'student profile' for the multi academy trust or individual academy to complete for the learners when registering them to the EDClass+ seat (as outlined "Information Sharing" section, page 30, of the KCSIE 2023) Ensuring that we have access to appropriate safeguarding information for the learners is pivotal to their safeguarding.

Also, keeping in line with GDPR, this information can be removed on the EDClass platform when the learner is no longer accessing the EDClass seat.

EDClass provide live tracking systems across the platform for the multi academy trust or individual academy staff to access. This is in an observation area where the staff can view; learners' content they're currently studying, live chats and the live stream.

In regards to the attendance of the learners, the multi academy trust or individual academy determines the appropriate registration points for the learners and if the learner does not access the platform within 10 minutes of that registration point they will trigger a 'failure to register' alert.

This in turn, triggers an email and text to alert contacts added to the learner's profile, informing those alerts contacts (the multi academy trust or individual academy staff can include parents/guardians as alert contacts) that the learner has failed to register.

Also, upon accessing the platform an IP, check is done to ensure that this matches the registered IP Address on the learner's profile. If the IP address conflicts this also triggers the alerts in the same fashion as a failure to register.

Another alert protocol is that the learner must complete a ready-to-learn questionnaire when logging on. This series of questions includes questions to ensure that the learner is safe in their environment and in the correct mindset to complete their work. If a negative is answered to these questions for example;

Q: Are you safe

A: No

This will trigger an alert. We receive an "office alert" meaning a siren sounds off in the main office informing the account managers and teaching and support staff that an alert has occurred, this displays on the purpose-built monitor the student's details and you will receive a phone call, email and text message to the alert contacts to inform you.

Also, this automatically triggers a chat communication with our online support staff who will engage with the learner. The multi academy trust or individual academy staff, through the observation area, can also engage with the learner using the chat facilities.

All alerts are tracked and monitored in the student's report area and can be accessed at any point.



In addition to the alerts outlined above there is an alert button readily available on the student's side that follows them on each screen that they access. At any point this button can be pressed by the learner to trigger an "office alert" and the same protocols will ensue.

The platform has several tracking and monitoring tools available. The "Student Report" tracks the student's engagement in every lesson that they are assigned and access, down to the hours, minutes and seconds, they spend on each aspect of the lesson.

The report also shows the results of the lessons; the score that the students received in the various questioning and puzzle slides and also highlighted is the grade standard of the lesson they completed, providing a clear overview of the learner's performance in that lesson.

This is then tracked alongside the progress made along the learner's pathway to accrue an overview of the learner's performance on the platform.

Parental Involvement

Within EDClass there is an opportunity for parents to access their own area of the system to track and monitor learner progress. They are able to see the curriculum that has been assigned and the support to aid learner progress.



Section 8: Safeguarding Code of Conduct

- for all workers (including volunteers; advisers and consultants)

In its simplest form, 'safeguarding' can be defined as 'keeping children safe from harm'.

At EDClass, we believe that all share responsibility for safeguarding and promoting the welfare of children and young people.

The Safeguarding Code of Conduct below sets out what is required of you as a worker for EDClass.

This Code forms part of your contract of employment, as a member of staff, or your agreement to work as a worker; contractor; advisor or volunteer.

Background

EDClass is an online learning resource used by Schools, PRU's, MAT's and Councils to educate their students (Child/Young Person). In addition to that, vulnerable adults can also gain access to the platform.

EDClass is committed to

a) Providing a safe online resource and environment for learners

b) Working with partner agencies; schools, PRU's, MATS and Councils (our commissioners) to ensure that they can comply with the requirements of their Local Authority Safeguarding Policies and Procedures

The Safeguarding Code of Conduct:

- ✓ Makes clear what is required of all staff, workers and volunteers
- ✓ Supports staff, workers and volunteers in meeting their obligations
- ✓ Reduces the risk of misplaced or malicious allegations by clarifying responsibilities

The Safeguarding Code of Conduct

Staff, workers and volunteers must:

- ✓ Report any incidents or concerns that cause them to believe that a child or young person is, or is likely to be, at risk of harm immediately to the Senior DSL. EDClass will support any staff member, worker or volunteer who raises a legitimate concern about the actions of others without fear of recrimination
- Disclose any criminal record, caution, reprimand or warning whether received prior to or during the course of their work or volunteering for EDClass. For the avoidance of doubt, this requirement is in addition to any other published requirement for disclosure as part of their work or volunteering
- ✓ (This will be treated confidentially by the management team. Please note all disclosures will be subject to a risk assessment to deem whether it is acceptable for the organisation to safely manage.)
- ✓ Inform the Senior DSL of any ongoing or past child protection investigations into their own immediate family
- \checkmark Undertake training in safeguarding and discuss this code with the Senior DSL



It is not permissible (and in some instances may be unlawful) for staff/volunteers to:

- ✓ Use their position to intimidate, bully, threaten, discriminate against, coerce or undermine children and young people, volunteers or staff
- ✓ Communicate with children or young people in ways which seek to build inappropriate relationships in order to abuse or put them at risk
- ✓ Encourage or assist others to break the law in any way
- ✓ Carry out their duties or volunteering whilst adversely affected by alcohol, solvents or drugs
- Engage in, or attempt to engage in, sexual or inappropriate relationships with children, or young people for whatever reason, including the use of suggestive conversations, comments, texting or emails
- Possess indecent images of children; this will always be reported to the police regardless of the explanation provided
- ✓ Use your mobile phone whilst 'at work' during contracted hours. You must only use your mobile phone during breaks and in a designated area

Staff will conduct themselves in accordance with this Safeguarding Code of Conduct in all work/volunteering for EDClass.

Any breach of the Safeguarding Code of Conduct WILL result in disciplinary action or dismissal or the decision to cease using you as a volunteer; advisor or consultant.

In certain circumstances such action might also result in reports to registering bodies and/or the police.



Section 9: Safeguarding framework

EDClass is committed to

a) Providing a safe online resource and environment for learners

b) Working with partner agencies i.e. schools, PRU's, MAT's and Councils to ensure that they can comply with the requirements of their Local Authority Safeguarding Policies and Procedures

EDClass will comply with and apply good practice outlined in external statutory guidance* and our own core child protection standards.

This framework detailed outlines how we manage risk so as to minimise circumstances where harm may befall children or young adults using the services of EDClass through acts of omission (for example failure to make referral of a child protection concern) or commission (for example direct abuse of a child, young person or vulnerable adult) by EDClass workers (inc. volunteers).

We manage risk through:

1. Accountability

- ✓ EDClass has a nominated Designated Safeguarding Lead. This is Cara Batsford. Cara Batsford reports directly to the Managing Director.
- ✓ Safeguarding Policy, Procedures and Code of Conduct
- ✓ Being clear with partner agencies; contractors and commissioners about our safeguarding expectations
- ✓ Clear strategies for safeguarding which anticipates and responds to external and internal developments
- ✓ Secure IT and telephone systems
- ✓ All building is under CCTV surveillance
- ✓ Policies and procedures such as Whistleblowing Policy; Complaints policy, Prevent Policy and Child-onchild Abuse Policy
- ✓ A clear organisational focus on risk management
- 2. Acting on concerns of abuse
 - ✓ Consistent procedures for reporting concerns to partner agencies and investigating agencies (including low-level concerns)
 - ✓ Working jointly with other agencies to provide services
 - ✓ Management of allegations against staff
- 3. Recording and information sharing
 - ✓ Recording and reviewing file information to identify patterns of risk
 - ✓ Information sharing with other agencies to protect children
 - ✓ CCTV
 - ✓ Secure IT and telephone systems
 - ✓ Fully trained and qualified staff with SIA CCTV licence
- 4. Recruitment (Please view Section 14: Safer Recruiting Policy).
 - ✓ Standard safer recruitment processes to ensure consistency
 - ✓ Recruitment in line with the expectations of 'Keeping children safe in education 2023
 - ✓ Requirement for 3 references
 - ✓ Requirement for criminal records checks (Enhanced) including barred list
 - ✓ Scrutiny of employment history for suspicious gaps

5. Supervision

- ✓ Regular formal supervision of all EDClass staff at all levels
- ✓ Regular staff appraisal/ performance review

6. Inspection

- ✓ Internal and external inspection of service
- 7. Empowering children
 - ✓ Ensure EDClass remains child-centred and educational-focused
 - ✓ Commitment to equality/diversity issues e.g. being able to communicate to any service users

EDClass' resources in first language; age appropriate interaction; awareness of issues around gender, sexual orientation, religion, disability and race;

- ✓ Development of participation
- ✓ Development of education and qualifications
- ✓ Commitment that protection of Children; Young People and Vulnerable Adults is always taken seriously
- ✓ Formal complaints process

8. Raising concerns about poor and dangerous practice (whistle-blowing)

- ✓ Whistleblowing Policy
- \checkmark An organisational culture which allows challenge to poor practice
- ✓ Clear procedure backed up by disciplinary/criminal code
- ✓ Independent investigation of concerns
- ✓ No victimisation of whistle blowers
- ✓ Emphasis on learning from mistakes

9. Learning and development

- ✓ Induction and continuous learning matched to roles and responsibilities for safeguarding and protecting children and young people
- ✓ Mandatory training requirements
- ✓ Regular staff appraisal/ performance review
- ✓ Learning and development opportunities to support the implementation of safe positive behaviour management

* September 2023. Department for Education: Keeping children safe in education. Statutory guidance for schools and colleges.

* July 2018. HM Government: Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children

* March 2015. HM Government: What to do if you're worried a child is being abused. Advice for practitioners



Section 10: Safeguarding and professional boundaries at work

DEFINITION

EDClass believes that every child, young person and vulnerable adult has a right to be safe from harm. EDClass may work with a child, young person or vulnerable adult as a 'service user' of its systems or whilst they are on work experience with the EDClass.

Professional boundaries are the framework by which an individual member of staff's relationship with a child, young person and vulnerable adult or service user is clarified to ensure that it is always safe and appropriate. It defines the parameters of that relationship to ensure it is professional and complies with the EDClass Safeguarding Code of Conduct.

PURPOSE

This policy not only protects the children, young people and vulnerable adults we work for and with but also safeguards the reputation of the EDClass. If staff and volunteers are clear about professional boundaries and what is and is not acceptable this can protect them from the possibility of false allegations and poor practice.

SCOPE

This policy document applies to all EDClass Limited staff and volunteers who have regular access to children, young people and vulnerable adults as part of their work.

A breach of professional boundaries is never acceptable and it is the responsibility of the managers to make sure the relationship with a child, young person or vulnerable adult is maintained on a professional level.

Professional boundaries are important in our work for a number of reasons:

- ✓ To safeguard children, young people and vulnerable adults and to ensure that staff/volunteers are aware of what EDClass expects of them in terms of their conduct and relationships with them, their educational institute and their families.
- ✓ To recognise and appropriately manage power imbalances and unequal relationships.
- ✓ To build appropriate relationships of trust with children, young people and vulnerable adults alongside their educational establishment.
- ✓ To ensure we understand the issues around working with vulnerable children, adults and families within education and their expectations of any EDClass worker.
- ✓ To fulfil the requirements of different regulatory bodies and Schools and the need to comply with their codes of conduct and practice.
- To protect the reputation of The EDClass

SETTING AND MAINTAINING PROFESSIONAL BOUNDARIES WITH CHILDREN, YOUNG PEOPLE AND VULNERABLE ADULTS.

Before undertaking any work with or delivering any service to children, young people and vulnerable adults it is important that clear boundaries about the nature of the work and relationship are set.

Staff and volunteers should be familiar with the EDClass Safeguarding Code of Conduct and the safeguarding & Protecting Children and Whistle blowing policies in order that they can refer to them in all of their work with children, young people and vulnerable adults.



PROFESSIONAL BOUNDARIES POLICY

Staff/volunteers should:

- ✓ Be clear of their roles and responsibilities as defined in their job description and confirm that understanding in discussion with their line manager
- ✓ Know and practice the protocols around confidentiality and recording and share these with the school child/young person/vulnerable adult and family as appropriate
- ✓ Continually reflect upon and consider the relationships established with children young people and vulnerable adults to ensure that the professional boundaries are being maintained whilst educated through EDClass
- ✓ Seek help and support in dealing with issues or concerns they have about professional boundaries from their line manager

MANAGING A BREACH OF PROFESSIONAL BOUNDARIES

Staff/volunteers may at times breach professional boundaries even though their initial intentions were well meaning. Regardless of the intention, the issue must be shared with the line manager and steps taken to support the individual not to repeat the behaviour or action. The breach may not be a single event but a series of events and interactions which together cause the individual to cross the boundary between what would be considered a professional relationship to a non-professional relationship. Areas where professional boundaries can be breached may include:

BECOMING OVER-FAMILIAR

If the relationship with a child, young person or vulnerable adult becomes over-familiar professional judgement may be clouded and behaviours may be misinterpreted. Over- familiarity is difficult to define but may involve:

- ✓ thinking about the child, young person or vulnerable adult constantly;
- ✓ feeling a sense of attachment similar to them being a sibling or a friend;
- ✓ wanting to see them more than necessary or continue the relationship even when any planned work is finished; and
- ✓ considering asking them to come with you to social events that are not work related.

In any work undertaken with children, young people and vulnerable adults there must be a clear plan of how, where, when and why the work will be undertaken and by whom with clear plans being established with their school / organisation. This includes not visiting a child, young person or vulnerable adult outside of agreed and planned working hours and not inviting them to your home or to be part of your family or social network. Any changes to the agreed parameters of the work must be discussed with your line manager and recorded in a plan alongside clear discussions with the school/college.

INAPPROPRIATE FEELINGS

Any concern about the nature of the relationship with the young person or vulnerable adult should be discussed with the senior DSL to avoid misinterpretation or confusion on the part of the child/young person/vulnerable adult service user or potential breach of professional boundaries. This includes a worker's perception that a child/young person/vulnerable adult has developed a "crush" on them or another worker.

GIFTS AND FAVOURS

Staff/volunteers should never use a relationship with a child, young person or vulnerable adult or their family for personal gain.



This includes using contacts to get information that they would not otherwise have access to or obtaining discounted or free products. Gift giving and accepting should only take place in line with EDClass agreed policies general obligations to EDClass and should be agreed with your line manager.

FAMILY AND FRIENDS

There may be some instances where staff/volunteers live and work in the same community as service users of EDCLASS services. It is usually inappropriate for EDClass Limited staff/volunteers to deliver a service and education a friend or family member. If this situation occurs, arrangements should be made for another staff member to take over the case and not be the account manager. Any exceptions to this must be agreed with the Senior DSL.

SEXUAL RELATIONSHIPS

Any inappropriate sexual relationships with service users or members of their families are a breach of professional boundaries and codes of practice and may also be against the law. (Exceptions would be where staff member is married to the parent of a service user for example).

SELF DISCLOSURE

Although some member of the EDClass Limited staff may have had personal experiences of abuse in their own life which may give them empathy and understanding of the situations in which the children, young people and vulnerable adults they work with find themselves in, it not usually acceptable for a member of staff to self-disclose their personal experiences to a service user / school / organisation. Apart from being unprofessional a worker might find they are vulnerable or at least embarrassed if their personal information is given to others.

GIVING OUT PERSONAL CONTACT DETAILS

Staff must not give out their personal mobile, home telephone numbers or home email in any circumstances to any child / young person / vulnerable adult. If staff require any contact with a user of EDCLASS this should be done through appropriate use of EDClass issued equipment.

If the service user needs to contact the member of staff they should wherever possible use the work email address, telephone/text number. It is not appropriate for staff to be part of service user social networking sites or agree to be e-friends, unless this is an agreed part of the work and has been risk assessed by the Senior DSL.

Staff must not share personal blog addresses or other modes of electronic communication with children, young people or vulnerable adults. It is also important that staff are aware of privacy setting on their own personal social networking sites to prevent inappropriate content being shared with service users.

CONTINUING A PERSONAL RELATIONSHIP AFTER THE SERVICE OR PIECE OF WORK IS COMPLETE

It is normally not acceptable for a member of staff to continue to see a child, young person or vulnerable adult in a personal capacity once the service or piece of work they have been involved in is complete. Any exceptions to this must had been agreed with the Senior DSL and demonstrate that there is a purpose to the continued contact that is in the service user's best interests and does not compromise professional boundaries in any way.

MANAGEMENT RESPONSIBILITY AND SUPERVISION

It is important that managers use supervision to help workers reflect on their professional relationship with children, young people and vulnerable adults and identify if there are any warning signs that professional boundaries may be in danger of being compromised. If at any time a member of staff believes that it is appropriate to act in a way which is counter to this policy and procedure, they must discuss this with their manager before taking any action and a record must be kept by them and the manager of the discussion. All staff and volunteers have responsibility to act if they suspect that a colleague may be in breach of professional boundaries. In the first instance you should share your concerns with your Senior DSL. If you don't feel able to do this then you should

refer to the EDClass Whistle blowing policy and guidance. These will enable you to talk through your concerns confidentially. You must always act upon your concerns to protect children.

The Senior DSL must print this form for staff/worker signature at the commencement of employment or for already employed workers at the next supervision meeting.

Section 11: Safeguarding our learners and staff whilst delivering teaching and learning sessions

Students can access the support mechanism within EDClass instantly once they are logged on to our online virtual portal classroom and seats.

This is where teachers and assistants can be seen live teaching and supporting your students. Once in a seat, the live stream starts for safeguarding and the learner can ask for assistance anytime via face-to-face; verbal chat; instant chat; written chat; question and answer sessions.

We record everything. We save our face-to-face, text and verbal communications directly to your server for child protection and safeguarding. The progress of answers, questions and knowledge are instantly tracked in our live activity tracker. Meanwhile, a manager in charge of EDClass in schools in Multi-Academy Trusts (our partners) can have eyes-on learning and an overview of the curriculum to see:

- ✓ the learner
- \checkmark every learner under the control of the manager, school or MAT account
- ✓ the teachers
- ✓ the support assistant and teaching assistants
- ✓ the conversation
- ✓ the questions
- ✓ every action performed by EDClass staff and pupils
- ✓ the live picture
- ✓ any other thing taking place whilst the webcam is recording (for safeguarding purposes!)

We offer a fully-safeguarded distance learning system that can help address:

- ✓ Blended learning via our virtual classroom.
- ✓ Face-to-face learning one-on-one to help raise attainment and attendance.
- ✓ Remote learning for those students and staff that are ill and shielding.
- ✓ Interactive learning via the portal for a range of solutions for staff rotation and a varied curriculum.
- ✓ 'Eyes-on learning' via our support and timetabled sessions.

We actively track the learners live on the platform so that the learners who do fall "idle" are engaged by a member of the support staff online. Though as part of the several alert protocols available in the platform, we also have an alert protocol that can notify any alert mobile contact of any student that has become idle in a timeframe determined by the multi academy trust or individual academy.

This requires the school/academy to communicate with EDClass, whether this feature is to be activated.

For example, you have the facility to state that "student x" will trigger an alert to the mobile contact after 10 minutes of inactivity with a subsequent alert every 5 minutes after that point.

Students using EDClass will work to a set schedule. Teachers can set when the students are expected to register on the website in the morning and afternoon. This is saved and able for you to view with a trackable report and



inspection section available. If a student fails to register when they have been scheduled to, an attendance report will be sent via email to the school and parents who have provided a contact email address.

Discussions: All online discussions between the teacher and student are recorded for safeguarding purposes but enables the students to ask for help, guidance and assistance securely. There is total transparency of progress, attendance, attainment and behaviour throughout the system for staff, parents, students and behaviour support.

Online access: Our platform can be accessed at any time from any location with an internet connection that your school deems appropriate for learning. This will help schools and centres educate those hard to reach students who have difficulty attending mainstream provisions.

(Please view Section 13: Online Safety Policy)

Support: We can offer any individual that is on the system, whether they are on-site or off-site, support through their learning. All of our support officers are uniquely trained to have extensive knowledge and understanding of our lessons, system, qualifications, methodology, exams, coursework and practical element.

Safety questionnaires: Students will complete a safety questionnaire at the beginning of a session to confirm that they feel safe, have the correct equipment and are ready to learn. The questions can be edited and personalised to suit individual students.

Alerts: While on the system, students will have access to an "alert" button. If at any point there is an emergency or change in circumstances, the student can use the alert button to alert the relevant staff at your establishment via email, text and phone call.

Chat logs: All written communication between your students and our tutors are recorded and backed up for safeguarding purposes. All chat logs, video and audio from your students and teachers using the Virtual Classroom are recorded and exported to your establishment. The diagram below identifies how safeguarding is central to all learning, aspects and target groups within different cohorts that can all use the interactive learning platform and the teaching at the same time.

EDClass Responding to a Safeguarding/Child Protection Concern in person/on the phone/via email/via messenger/via EDClass platform

- 1. If you receive details the service user that they are in immediate danger advise them
 - ✓ to call the police
 - ✓ that you must call the police and pass the information on to their School and local child protection services.
- 2. If the content within any disclosure is non-school related
 - ✓ contact the school and ask to speak with either the contact we have OR their Safeguarding Lead. Inform them verbally about the disclosure and provide details. Immediately follow up with a written record using Template for Recording a Safeguarding Incident form.
- 3. If content within any disclosure is school related
 - a) About a teacher
 - I. Contact the school and ask to speak with the Safeguarding Lead or the Head.
 - II. Inform them verbally about disclosure and provide details.
 - III. Inform them you will be letting their Local Authority Designated Officer (LADO) know as a matter of our procedures.
 - IV. Immediately follow up with a written record using a Safeguarding Incident form.
 - V. Inform Local Authority Designated Officer (you will have to google details putting in for example 'Local Authority Designated Officer Sheffield'). This HAS to be done within 24 hours. If they are



unavailable contact the local Safeguarding Team. DO NOT leave it. Again, follow up to the person you have spoken with, with a written record using a Safeguarding Incident form.

- b. About the Head
 - I. Inform Local Authority Designated Officer first (you will have to google details putting in for example 'Local Authority Designated Officer Sheffield'). This HAS to be done within 24 hours. If they are unavailable contact the local Safeguarding Team. DO NOT leave it. Again, follow up to the person you have spoken with, with a written record using a Safeguarding Incident form.
 - II. Inform Safeguarding Lead of School as a matter of action you have had to take

If the child contacts EDClass BUT is not in receipt of any EDClass Service and not in immediate danger, advise them they need to contact or offer to contact on their behalf:

- ✓ Their local authority for support and advice; or
- ✓ Childline (0800 1111)
- ✓ NSPCC
- ✓ Complete a template for Recording a Safeguarding Incident form any information you have.

Responding to calls from the general public regarding concerns about a child, the safety of a child or the behaviour of an EDClass worker / volunteer

- 1. Thank the caller for doing the right thing and speaking up on the service users/child's/young person/vulnerable adult behalf.
- 2. Ask if the service user/child's/young person/vulnerable adult is in immediate danger? If yes the caller should be informed to dial 999 or should be supported to dial emergency services with our assistance.
- 3. If not in imminent danger, ask if the concern is about the behaviour of any EDClass member of staff, volunteer? If yes, please speak to your line manager immediately after the phone call is concluded. Then the line manager will refer the concern to the Senior Manager, Director or higher.
- 4. If the concern does not involve a member of EDClass staff, the caller should be directed, as appropriate, to:
 - \checkmark The School responsible for the service user
 - \checkmark Their local authority who will provide information and support.
 - ✓ The National Association for People Abused in Childhood (Historical Abuse -0800 085 3330).

Record using a Safeguarding Incident Form.



Section 12: Behaviour and Relationship

1. Our Approach and Values

Our approach means that our learners can benefit from:

- ✓ Learning away from the glare of other learners, thus reducing perceived pressure from other learners
- ✓ Having one-to-one support, both with their academic progress and pastorally
- \checkmark Learning without distraction and with improved opportunities for focus
- ✓ A reduction in anxiety levels and fear of failure around learning
- Learning in a familiar environment away from any previous history of negative experiences (a 'fresh start')
- ✓ Reduced negative behaviours and the resultant positive impact on relationships and concept of 'self'
- ✓ Support from teachers careful to avoid triggers to negative feelings / behaviours
- ✓ Improved attendance and engagement in learning
- ✓ Learners make better progress when they feel safe and there are routines and boundaries
- ✓ Some learners need support to alter their behaviours and mind set
- ✓ Talents are encouraged and achievements are celebrated

Our teaching staff focus on overcoming difficulties through the use of encouragement, praise, support and positive regard. At the heart of our teaching and learning are our values:

- ✓ Every learner deserves the opportunity to meet their intrinsic need to learn, achieve and grow
- ✓ We seek to afford every learner the right to harness education as a vehicle for improvement
- ✓ We uphold the principle of unconditional regard
- ✓ We are acutely mindful of the barriers to participation learners may be encountering in their lives and education
- ✓ We recognise that many of our learners are operating below their true potential with gaps in their knowledge and skills that need supporting
- ✓ We will always maintain the best interests of a learner or young person in everything that we do

2. Expectations for Learners / Behaviour

It's important that our learners' experience of EDClass is similar regardless of who is delivering that support. It's also important that learners receive pastoral care and, learner allowing, can develop a friendly rapport with staff.

Although support is one-to-one and learners will feel 'at home' as they learn remotely, they are expected to dress appropriately, behave well and communicate respectfully.

Learners shouldn't be wearing dressing gowns or be half-dressed. They should be told to go off camera (if applicable) and dress appropriately – remind them they are recorded and school has access to recordings.

On rare occasions, clear boundaries and expectations may need to be set for a learner, for example if their language is abusive or insulting, or if they are rude / present an unpleasant or inappropriate attitude. You might tell them not to speak to you like that, that school is being informed or that you won't respond unless there is a change. Learners should be told to turn Caps Lock off – it can be interpreted as rude or aggressive.

3. Management of Behaviour to Ensure a Safe Learning Environment:

Many of our learners have experienced criticisms, harsh voices and shaming. Some have developed strategies and defences to avoid investing in what they perceive has the potential to be another negative relationship. Our



teachers ensure interaction is engaging, positive and non-judgemental, whilst encouraging trust and familiarity with the routines and the teachers themselves.

Our aims are:

- ✓ to have clear rules and routines for behaviour, and take responsibility for promoting good and courteous behaviour
- ✓ to have high expectations of behaviour, and establish a range of strategies using praise, sanctions and rewards consistently and fairly
- ✓ to manage classes and learners effectively, using approaches which are appropriate to learners' needs in order to involve and motivate them
- ✓ to maintain good relationships with learners, exercise appropriate authority, and act decisively when necessary

Low-level	Medium-level	High-level
Failing to complete work	Confrontational	Any form of abuse / abusive behaviour
Inappropriately Dressed	Aggressive / threatening language	Aggressive / threatening language
Arguing	Lack of tolerance or respect for others	Aggressive / threatening behaviours on camera
* Use of phone	Undermining fundamental British values	Illegal behaviour on camera (including vaping / alcohol etc)
Rudeness	Misuse of emergency alert button	Disclosure of information pertinent to safeguarding / wellbeing
Impatience in EDSupport chats	Presence of persons Unknown	Learner misleading teachers as to who they are

4. Level of Concern Regarding Behaviours:

* this is deemed a high level of risk if a learner is a CCE / CSE concern

This documentation works with our behaviour rewards and sanctions document

5. Sanctions

For behaviours which cause concern or which are not conducive to learning / are inappropriate / unacceptable. The table above is a guideline - low-level concerns might be dealt with by using the EDSupport chat or video chat: point out the behaviour that is a concern, if necessary, explain what should be done instead and record using the 'Comments' icon on the learner's tile.

Persistence in this behaviour escalated the concern to the middle column, where a school may be emailed and the communication recorded in the school side of top-level admin. For concerns in the middle or last

column, a learner should be told that school is being informed, an email sent, recorded in 'Communications' and a comment entered from the learner's tile.

1. Expectations of Learners' Behaviour on EDSupport:

It is important that our learners' experience of EDClass+ support is similar regardless of who is delivering that support. It is also important that learners receive pastoral care and, learner allowing, can develop a friendly rapport with staff.

Although support is one-to-one and learners will feel 'at home' as they learn remotely, they are expected to behave well and communicate respectfully:

- ✓ Learners should be dressed in day clothes to show they are ready to learn
- ✓ Learners using phones on camera (other than where permission has been given to take screenshots) will be challenged by teachers
- ✓ Learners should quickly develop an expectation of being greeted politely and assured that teachers are here to support or discuss any issues or interests
- ✓ Learners should use language which is respectful and non-aggressive / non-threatening at all times in cases where their language is inappropriate / abrupt or rude this should be addressed
- ✓ Learners displaying aggressive or threatening behaviours with others on camera should expect to have this addressed as a matter of urgent safeguarding
- ✓ Learners with behaviours which are not age-appropriate (such as, but not exclusive to, vaping, drinking alcohol etc) should expect to have this treated as a matter of urgent safeguarding
- ✓ Learners on camera with 'unrecognised' other people present (not identified on their learner profile) can expect to be questioned as to who they are
- ✓ Learners who disclose information which may be pertinent to their safeguarding and wellbeing (for example, but not exclusive to, going out to meet someone, having injured themselves, feeling down, just been screamed at by a parent etc) can expect to have this treated as a matter of urgent safeguarding
- ✓ Learners should expect to be treated with dignity and respect, and at all times observing proper boundaries appropriate to staff's positions
- ✓ Learners must expect teachers to have high regard for the need to safeguard them and their wellbeing, and in accordance with statutory provisions
- ✓ Learners must show tolerance of and respect for the rights of others
- ✓ Learners must not undermine fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs
- ✓ Learners can expect that personal beliefs are not expressed in ways which exploit their vulnerability or might lead them to break the law
- ✓ A learner using the chat feature deliberately to mislead teachers as to who they are or fabricating scenarios which begin safeguarding procedures and which later have been found to be false will be treated as an urgent matter to be reported to schools and maybe appropriate authorities

Please view

Section 11: Safeguarding our learners and staff whilst delivering teaching and learning sessions

7. Rewards

Learners receive praise for a positive attitude to learning, a commitment to making progress, completion of lessons to a high standard and engagement with teachers to acquire knowledge and develop confidence.

Teachers may message learners in the chat or on camera to say 'Well done' for their effort in a particular lesson, or for their effort on any day. These messages are recorded under 'Comments' from the learners' tiles.

EDClass also rewards learners for their work by awarding 'EDDollars', which can be spent to access educational games (outside of timetabled time) on the platform. They can be awarded when marking work submitted, or through a learner's tile, and are awarded, for example, for:

- ✓ Work of a high standard
- ✓ Work which shows progress
- ✓ A high level of engagement, in support chats or in a lesson
- ✓ Signs of developing self-worth or confidence (see 'Little Wins' above).

EDDollars are also used by learners as a measure of their achievement / progress over time.

Certificates are awarded to learners for:

- ✓ Student of the Month
- ✓ Student of the Term
- ✓ Student of the Year
- ✓ Most Lessons Completed to a High Standard
- ✓ Most Hours on the System
- ✓ Notable Progress in Self-Confidence

Schools are notified of learners receiving certificates should they also wish to congratulate them.

8. Development of Self-Worth and Confidence

'Little wins' are recorded under 'Comments' on a learner's tile and can be seen as achievements that can be credited to a learner which may not be academic and which should relate to learners showing more readiness for the world of work / progression / post school and may include, but isn't limited to:

- ✓ A learner developing the confidence to respond to a chat greeting
- ✓ A learner developing the confidence to move beyond one-word responses to chat greetings and asking how the teacher is in return
- ✓ A learner developing the confidence to ask teachers for help with the work
- A learner developing the confidence to ask teachers questions which reveal developing social skills (maybe pets, the weekend, hobbies, interests, the weather, favourite foods etc)
- ✓ A learner showing greater independence / no longer needing to work alongside a parent / carer
- ✓ A learner moving from typed messaging with teachers to a willingness to speak over the camera feed
- ✓ A learner progressing from sitting in the dark on their camera feed to sitting in normal daylight
- ✓ A learner wanting to email teachers work they have completed, revealing their sense of pride and achievement
- ✓ A learner's language shifting from rude / aggressive to mannered and polite
- ✓ A learner messaging their appreciation to teachers / showing gratitude

The 'Comments' provide a log of pastoral positive comments to run alongside an academic progress report and any concerns.



9. Monitoring Poor behaviour

This is also to be logged under 'Support Log' to help provide a pastoral snapshot of a learner. These are behaviours which can be seen to inhibit a learner's progress and their readiness for the world of work / progression post-school and may include, but is not limited to:

- ✓ A learner using insulting / threatening / rude or aggressive language
- ✓ A learner using the chat feature deliberately to mislead teachers as to who they are or fabricating scenarios which begin safeguarding procedures and which later have been found to be false
- ✓ A learner making comments which may cause offence in their marking
- ✓ A learner who deliberately uses 'red flags' in chats or marking to begin safeguarding procedures (please see list of 'Safeguarding Issues'

10. Successful Re-Integration to School

- ✓ It is often a school's intention that after some time using Alternative Provision, a learner returns to the classroom setting. Sometimes the intention is a part-time return or it can be a full-time return. Often a school will plan for a learner to return part-time as a phased-back entry, building slowly to a full-time return.
- ✓ Any return to a classroom setting will involve a 'Re-integration Meeting' between parents or carers of the learner, the learner and representatives of the school. Often learners will tell EDClass teachers when they have meetings coming up and disclose how they feel about it. Teachers need to log knowledge of such meetings in the Support Log' to track how the reintegration is being planned, over wheat period of time and whether / how it will be phased in

11. Personal and Professional Conduct

The teaching team is expected to demonstrate consistently high standards of personal and professional conduct. The following statements (Gov.UK website: <u>https://www.gov.uk/government/publications/teachers-standards</u>) define the behaviour and attitudes which set the required standard for conduct:

- ✓ Teaching (and Support Staff) uphold public trust in the profession and maintain high standards of ethics and behaviour within and outside the company by:
- ✓ Treating learners with dignity and respect, building relationships rooted in mutual respect, and at all times observing proper boundaries appropriate to staff's positions
- ✓ Having regard for the need to safeguard learners' well-being, in accordance with statutory provisions
- ✓ Showing tolerance of and respect for the rights of others
- ✓ Not undermining fundamental British values, including democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs
- ✓ Ensuring that personal beliefs are not expressed in ways which exploit learners' vulnerability or might lead them to break the law



Section 13: Online Safety

Ensuring the teachers and children accessing the platform is vital. As on online education provider we endeavour to maintain clear high standards of support. This is reflected in the behaviour and sanction document that our teachers use to maintain the principles of education behavioural standards and this is led by Cara Batsford our DSL. Staff have all had necessary checks (Enhanced DBS) and are brought into the business through a safer recruitment process. (Please view Section 14: Safer Recruiting Policy). Children are then aware of the expectation within the online environment and the staff are cleared to work. The further training that the staff receive in regards to being able to identify and act on safeguarding concerns even in an online or remote environment.

We also, moving forward, will advise schools to ensure that they review and update their child protection policy to reflect the fact children may be learning both online and in the classroom. As stated throughout this document refer to the KCSIE 2023 there are clear guidelines and further references to documentation for students that are accessing online and remote education.

It is vital that parents, careers and children are effectively communicated with and understand about keeping a safe online working environment and actively encouraged to speak up should they feel any concerns regards anything online.

If there is a need to report anything, all should be aware of clear reporting routes and this should have been made clear from the start.

Our online safety Lead – Cara Batsford. Deputy safeguarding leads are Paige Bell, Kim Robinson, Emily Halliday, Sophie Beverley and Kate Redhead.

The Breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk: content, contact, conduct and commerce – Keeping Children Safe in Education 2023 (DfE)

Information and Communications Technology (ICT) covers a wide range of resources. These include:-

- ✓ Web-based and mobile learning. It is also important to recognise the constant and fast paced evolution of ICT within our society as a whole. Currently the internet technologies children and young people are using both inside and outside of the classroom include:
- ✓ Websites
- ✓ Learning Platforms and Virtual Learning Environments
- ✓ Email and Instant Messaging
- ✓ Chat Rooms and Social Networking
- ✓ Blogs
- ✓ Podcasting
- ✓ Video Broadcasting
- ✓ Downloading from the internet
- ✓ Gaming
- ✓ Mobile/Smart phones with text, video and web functionality
- ✓ Other mobile devices with web functionality

EDClass understands the responsibility to educate pupils in all Online safety issues. This includes teaching them the appropriate behaviours and critical thinking to enable them to remain both safe and legal when using the internet and related technologies, in and beyond the context of a classroom.

Roles and Responsibilities

As Online safety is an important aspect of strategic leadership within EDClass, the Senior Leadership Team have ultimate responsibility to ensure that the policy and practices are embedded and monitored. The named Online safety co-ordinator at EDClass is Cara Batsford. All members of staff have been made aware of who holds this post. It is the role of the Online safety coordinator to keep abreast of current issues and guidance through.

The Online safety coordinator updates the Managing Director of any issues within the business in relation to local and national guidelines and advice.

Writing and reviewing the Online safety policy

This policy (for staff, volunteers, visitors and pupils), is to protect the interests and safety of the business. It is linked to the following policies: Health and Safety, Child Protection, Bullying and Harassment, internet usage and Prevent policies. (Section 19: Prevent Policy)

Our Online safety policy has been agreed by the Director, Senior Management Team and all staff. The Online safety policy and its implementation are reviewed at least annually.

Online safety skills development for staff

- ✓ All members of staff receive regular information and training on Online safety issues through staff meetings, training sessions and email updates.
- ✓ All members of staff have been made aware of individual responsibilities relating to the safeguarding of children within the context of Online safety and know what to do in the event of misuse of technology by any student or member of staff.
- ✓ All new members of staff receive information on the Acceptable Use Agreement as part of their induction.

Teaching and Learning

Internet use will enhance learning

- ✓ EDClass will provide opportunities within a range of curriculum areas to teach Online safety.
- Educating pupils on the dangers of technologies that may be encountered outside school is done informally when opportunities arise and as part of the Online safety curriculum.
- ✓ Pupils are made aware of the impact of online bullying (Cyber bullying), prejudice-based bullying, discriminatory bullying or to sexually harass online and know how to seek help if these issues affect them. Pupils are also made aware of where to seek advice or help if they experience problems when using the Internet and related technologies; i.e. parent or a career, a teacher or a trusted member of staff, or an organisation such as Childline 08001111 or CEOP.

Managing System Access

EDClass advises schools throughout the sales process and through documentation and training sessions with schools that when children are added to an EDClass seat and given a school laptop to work from, that the laptop meets certain specifications in order to successfully navigate the EDClass platform. EDClass also advises the partnership schools it works with to ensure the laptops that are used for children to access the EDClass platform have appropriate filtering and monitoring technologies installed on the devices. This can be found in our signed Service Level Agreement (SLA) with each school.

The EDClass system also has some key online safety features inbuilt on the platform. The bad bug word notification will alert relevant staff by email informing them immediately that there is a work that has been submitted by a student that could be a safeguarding concern. The team member will immediately find out the context of the bad word and identify if it is a safeguarding concern. It may be that the word has come through and is in context with

the lesson being completed, if that is the case, there will be no further action. If there is a concern, the usual process will be followed.

There are several lessons on the platform that educate our users on online safety and the dangers that are associated with learning online and remote working. We also have lessons available for parents and carers of children about online safety and they can be found on the parent's page and are free of charge to access and complete.

Parent/guardian assistance

Each parent or guardian receives a log in so they can see how their child is progressing. This log in also allows them to gain access to the online learning lessons for online safety for parents/guardians. We also welcome communication with parents and guardians through our school account managers in order to assist them with what is being asked of their child and who is online with their child as per Keeping Children Safe in Education 2023.

Information system security

- ✓ EDClass ICT systems, capacity and security will be reviewed at least annually.
- ✓ System security is overseen by our development team and our Director Ian Hargreaves.
- ✓ It is the Online safety Leads responsibility to spot check staff chats with students to ensure policies are being implemented and maintained.

Published content and our web site

The contact details on the website are the business address, e-mail and telephone numbers. Staff personal information is not published. The Senior Management Team will take overall editorial responsibility and ensure that content is accurate and appropriate.

Social networking and personal publishing

EDClass blocks access to personal social networking sites.

- ✓ Staff are advised during induction that the use of social media networks outside EDClass are to be used with caution.
- ✓ Staff are advised to set and maintain profiles on sites to maximum privacy and deny access to unknown individuals.
- ✓ Staff are asked to report any incidents of bullying on social media to their line manager.
- ✓ Staff are advised not to add children, or parents as 'friends' if they use social media.

Managing emerging technologies

- ✓ Emerging technologies will be examined for educational benefit and suitability and a risk assessment will be carried out before any use is authorised.
- ✓ The use of portable media such as memory sticks and hard drives will be monitored closely as potential sources of computer virus and inappropriate material.
- ✓ Staff are not allowed to bring personal mobile devices/phones in to the office. Lockers are provided for every member off staff for safe storage of their mobile phone/devices. Any staff that have brought phones or devices into the office will face disciplinary action.
- ✓ The sending of abusive or inappropriate messages outside business hours is forbidden and disciplinary action will follow for anyone found in breach of this rule.

Protecting personal data



EDClass will use information about students to tailor make learning in order to provide the best opportunities for students to learn taking into account their individual needs.

EDClass will hold personal information on its systems. EDClass works with third parties to integrate customer data on to our platform Customers choose how often the data is rechecked. We will ensure that all personal information supplied is held securely, in accordance with GDPR.

Policy Decisions

Authorising Internet access

- ✓ Access to the Internet should be by directly supervised and be too specific to approved on-line materials.
- ✓ All staff using a EDClass laptop, desk top, tablet or phone will be made aware of the internet usage Policy.

Password Security

- ✓ Customers are provided with a school ID, username and password.
- ✓ Students are provided with a school ID, username and password.
- ✓ All members of EDClass staff are aware of the importance of locking the devices when left unattended and of the importance of keeping passwords secret.
- ✓ All members of EDClass staff are aware of their individual responsibilities to protect the security and confidentiality of the data we collect.

Assessing risks

EDClass will take all reasonable precautions to ensure that users access only appropriate material. EDClass will audit ICT provision to establish if the Online safety policy is adequate and that its implementation is effective. The Senior DSL will be responsible for random spot checks for teacher/student chats to ensure policies are correctly implemented. This is also an opportunity for the Senior DSL to identify any safeguarding training that needs to be completed by the team.

Handling Online safety complaints

- ✓ Complaints of Internet misuse will be dealt with by a senior member of staff and reported to the Director.
- ✓ Deliberate access to inappropriate materials by any user will lead to the incident being logged by the Online safety Lead and disciplinary action will follow.
- ✓ Any complaint about staff misuse must be referred to The Senior Leadership Team.
- ✓ Complaints and concerns of a child protection nature must be dealt with in accordance with our child protection procedures. For example, evidence of: inappropriate online relationships; a child watching pornography or any '18' films on a regular basis; online/digital bullying, harassment or inappropriate image sharing etc. Cara Batsford is the Designated Safeguarding Lead.
- ✓ Staff and customers have been informed of the complaint's procedure.

Staff and the Online safety policy

- ✓ All staff must sign the Staff E- Learning Policy and a copy is kept on file.
- ✓ Any information downloaded must be respectful of copyright, property rights and privacy.
- ✓ All members of staff are aware that internet traffic is monitored and traced to the individual user. Discretion and professional conduct are essential.
- ✓ IT equipment issued to a member of staff remains the property EDClass.



✓ Users of such equipment should therefore adhere to policies regarding appropriate use with regard to Internet access, GDPR and use of software, both in and out of work.

The Learning Platform and other home/school internet use

 ✓ All staff have been trained and given advice on how to effectively use the internet, Microsoft Office and the EDClass Platform.

Monitoring and review

This policy is implemented on a day-to-day basis by all staff and is monitored on an annual basis by the Online safety Coordinator – Cara Batsford.

This policy is the Senior Leadership Team's responsibility and we will review its effectiveness at least annually. We will do this during reviews conducted between Cara Batsford - the Online safety Coordinator and Designated Child Protection Coordinator.

On-going child protection concerns and incidents will continue to be reported to the appropriate services.



Section 14: EDClass Limited Safer Recruiting Policy

1.1 Cara Batsford is the DSL for EDClass Limited. Deputy safeguarding leads are Paige Bell, Kim Robinson, Emily Halliday, Sophie Beverley and Kate Redhead. Cara Batsford is also responsible for creating the polices and ensuring the policies are strictly followed. Cara Batsford is safer recruitment trained, which is updated at least every 2 years and is responsible for all staff recruitment in to the business.

1.2 All job descriptions for advertised posts for EDClass Limited will include -

- ✓ That EDClass Limited is committed to safeguarding the welfare of children and young people
- ✓ The job title
- ✓ Main duties and responsibilities
- ✓ What the role entails
- ✓ Responsibilities to safeguarding
- ✓ Place of work
- ✓ Usual hours of work
- ✓ Essential criteria (which must be met in full)
- ✓ Desirable criteria
- ✓ That an enhanced DBS check will be sought for the successful candidate, which indicates if the applicant is registered as being barred from working with children and vulnerable adults

1.3 All person specification for advertised posts for EDClass Limited will include -

- ✓ That EDClass Limited is committed to safeguarding the welfare of children and young people
- ✓ Previous experience required
- ✓ Safeguarding in relation to the job
- ✓ Attitude and values we are seeking
- ✓ Skills required
- ✓ Qualifications required
- 1.4 EDClass Limited application form contains areas for candidates to fill out their -
 - ✓ Name
 - The position they wish to apply for
 - ✓ Any former names that the applicant has had
 - ✓ Applicants date of birth
 - ✓ Applicants current address (proof will be needed to be brought to the interview)
 - ✓ Disabilities
 - ✓ Long term illnesses
 - ✓ Interests/hobbies
 - ✓ Criminal background
 - ✓ Education and training
 - ✓ Employment history (in chronological order, with start and end dates and reasons why they left)
 - ✓ Part time and voluntary roles
 - ✓ Explanation of periods of unemployment
 - \checkmark A personal statement to show how the applicant meets the required person specification
 - ✓ At least 3 references (2 professional and 1 personal)
 - ✓ If they have previously worked with children, then at least one reference from that employer
 - ✓ A declaration stating if they have any association of any other EDClass Group employee

- ✓ A tick box to show that the information is accurate and nothing relevant has been intentionally omitted
- ✓ Space for a signature

When the application form is sent to applicants, guidance notes will also be supplied on how to complete the form and an explanation of how the candidates will be short listed.

1.5 When shortlisting applicants for interview, EDClass Limited will -

- ✓ Wait until the closing date to assess the application forms
- ✓ Have 2 people check application forms
- ✓ Return or disqualify application forms that are not fully complete
- ✓ Check any inconsistencies
- ✓ Check any employment gaps without explanation
- ✓ Select 4-5 candidates for interview
- ✓ Discuss any applicant that has been shortlisted but has disclosed a criminal background
- \checkmark $\,$ Identify anything that needs to be discussed and clarified at interview
- ✓ Look to seek references

1.6 EDClass Limited will request at least 2 professional references prior to interview and 1 personal/character reference. EDClass Limited will seek information regarding –

- ✓ Previous performance history
- ✓ Previous conduct, management issues and disciplinary investigations
- ✓ Disciplinary offences
- ✓ Any concerns the referee has regarding the applicant's suitability to working with children/young adults
- ✓ The skills and attributes that the applicant has in relation to the post they have applied for
- ✓ The referee will be made aware of the post the applicant has applied for and the interview date. The referee will also be given the job description and person specification of the job the applicant has applied for
- ✓ Referee will be given a deadline to return the reference back to EDClass Group
- ✓ The referee will be made aware that they have a legal liability for references and references should contain no material misstatement or omission
- ✓ The referee will be made aware that the content of the reference may be discussed with the applicant
- ✓ The referee will be made aware that they may be contacted for clarification of any part of the reference
- ✓ The referee will be made aware that the applicant has authorised the reference being sent for

1.7 If the applicant has previously worked with children, EDClass Limited will seek a 3rd reference from the applicant's manager in that role. EDClass Limited will seek to find –

- ✓ If the applicant has had any disciplinary offences relation to children
- ✓ The outcome of any enquiry into the applicants conduct or disciplinary procedure
- ✓ If the applicant is subject to any child protection concerns

1.8 EDClass Limited will provide all applicants that are invited for an interview with an applicant information pack. The pack will include –

✓ A letter, inviting the applicant to interview. The letter will ask the applicant to confirm if they are going to attend the interview, let the applicant know that we will now seek the references they have supplied us (any inconsistencies, discrepancies or abnormalities in the references will be discussed at



interview) with and a name and a contact number of who they can contact should they need to. The letter will also reiterate that should the application be successful, they will be subject to an enhanced DBS check. It will also let them know that we will check their suitability to work with children, young people and vulnerable adults.

- ✓ EDClass Groups commitment to safeguarding children
- ✓ Information on EDClass Group aims, aspirations and values
- ✓ EDClass Limited safeguarding statement
- ✓ Job description
- ✓ Person specification
- ✓ Information regarding the venue, the name of the people on the interview panel, the process that the interview will take and a contact number where applicants can ask for further information.
- ✓ A self-disclosure form for DBS with a sealable envelope in order for applicants to make a confidential disclosure
- ✓ An outline of EDClass Limited selection process showing how we check if the criteria has been met for safeguarding purposes
- ✓ How EDClass Limited will test and assess applicants during the selection process

1.9 During the interview, EDClass Limited will -

- ✓ Check the applicants training and education certificates
- ✓ Have the applicant sign the application form if it was submitted online
- ✓ Have at least 2 people present who both make notes
- ✓ Interview the applicants over a 1- or 2-day period
- ✓ Copy or scan photographic proof of identity
- ✓ Copy proof of the applicant's current address
- ✓ Ensure the same questions will be asked to all the applicants
- Ensure the candidate understands that if successful, they will be subject to and enhanced DBS and barring check, and clarify if they have anything that they wish to declare
- ✓ Give the applicants an opportunity to ask any questions
- ✓ Explain what will happen moving forward, when and how we will contact them
- ✓ Be prepared to give feedback

1.10 Post interview but pre-appointment, EDClass Limited will -

- ✓ Apply for an enhanced DBS check including barred list (including Directors and Shareholders) This is to be copied and kept securely in each staff file to be made available to the Secretary of State
- ✓ Check the applicant's health and sickness record (including Directors and Shareholders)
- ✓ Apply for Prohibition checks for all teaching staff (including Directors and Shareholders)
- ✓ Apply for a General Teaching Council for England Sanctions Check GTCE for all teaching staff
- ✓ Apply for all teachers that have failed induction or probation
- ✓ Re check the references that have been supplied (including Directors and Shareholders)
- ✓ Check the applicant's eligibility to work in the UK (including Directors and Shareholders)
- ✓ Appropriate checks are carried out if the applicant has been working overseas in accordance with the secretary of state (including Directors and Shareholders)

1.11 Post appointment, EDClass Limited will -

- ✓ Place each new member of staff on a 6-month probationary period, details can be found in each staff contract (including Directors and Shareholders)
- ✓ Copy the new starters training and education certificates (including Directors and Shareholders)
- ✓ Provide every new member of staff with aa comprehensive induction which includes a medical questionnaire (including Directors and Shareholders)

- Provide all staff members confidential welfare checks every 3-6 months with the ability to refer to Bupa Employee Assistance Programme if needed
- Provide every member of staff a full return to work interview after a period of absence to ensure staff are capable and competent to return to work (including Directors and Shareholders)
- ✓ Refer any team member necessary to Occupational Health
- ✓ Advertise and market that EDClass limited is a Disability Confident employer
- ✓ During the induction, make the new staff member aware of EDClass Limited's values and principles and policies and procedures (including Directors and Shareholders)
- ✓ Inform all new staff members who the safeguarding lead is within EDClass Limited (including Directors and Shareholders)
- ✓ Ensure all new members of staff read all the safeguarding policies and sign to say they understand it (including Directors and Shareholders)
- ✓ Ensure all new members have read and understood current legislation such as KCSIE (including Directors and Shareholders)
- ✓ Ensure all new members of staff read and sign the staff hand book (including Directors and Shareholders)
- 1.12 Promotion to Director (Or Shareholder)

All directors and shareholders will undergo Section 128 checks (if appointed after 12th August 2015) and prohibition checks.



Section 15: EDClass Safeguarding Procedures

Please note that within our safeguarding procedures the following:

Service user: is a child/young person using an EDClass Resource

Child/Young Person/Vulnerable Adult: is an individual under the ages of 18 who may be on work experience with EDClass and this work experience has been authorised by the senior management team. Please note that we do NOT allow staffs children to be present in the office

1. Communicating Safeguarding Responsibilities

Action: Senior DSL:

- 1. Ensure that all staff/volunteers are aware of this Policy and any relevant codes and practices.
- 2. Ensure local contact numbers e.g. social care departments are displayed in an accessible place for staff and volunteers.
- 2. Code of Conduct and Professional Boundaries

2.1 Induction (all departments)

Action: All Staff/Volunteers:

1. Ensure that you have read, fully understand and signed the Safeguarding Code of Conduct. It is your responsibility to speak to the Senior DSL if you are not clear or require further clarification.

Action: Line Managers

2. Ensure all staff and volunteers have fully understood and signed the Code of Conduct.

2.2 Gifts and Favours

Action: All Staff/Volunteers

- 1. You must not use a relationship with a service user or their family for personal gain. Gift-giving and accepting presents should only take place in line with EDClass' policies and be agreed with the Senior DSL.
- 2. Concern about a breach/potential breach of your own or a member of staff/external colleague's professional boundaries

Action: All Staff/Volunteers

- Concerns about a breach or potential breach of professional boundaries by you; a colleague or external agency must be shared immediately with your Senior DSL. This should happen regardless of whether the breach of professional boundaries was due to initial intentions being well meaning. A breach of the professional boundaries may place a service user or young person at risk of harm and you have a duty to act upon your concerns to safeguard a Child/Young Person/Vulnerable Adult.
- 2. Where you feel unable to report the concern/s to your Senior DSL, you should refer them to your Deputy DSL.
- 3. If you cannot raise issues through the Senior DSL or you consider the breach of professional boundaries not to have been dealt with appropriately through the DSL, you should report via the use the Whistleblowing Procedure.



Action: Senior DSL:

- 4. All potential breaches of professional boundaries should be taken seriously. The breach may not be a single event but a series of events and interactions that together cause the individual or a colleague/external agency to cross the boundary between what would be considered a professional relationship to a non-professional relationship.
- 5. Staff must be supported to address any concern about their own breach of professional boundaries without the automatic risk of disciplinary proceedings. However, staff should be made aware of all possible consequences depending on the severity and nature of the breach including possible disciplinary action; dismissal; referral to the Regulatory bodies, relevant local Authorities, Disclosure and Barring Service, and/ or police.
- 6. Investigate to establish the facts and decide whether there is a disciplinary case to answer refer to Disciplinary Policy and Procedure.
- 7. All breaches of professional boundaries are to be recorded on individual staff files including any action taken. In cases where there is found to be 'no case to answer' the outcome should still be recorded.
- 8. If concerns arise regarding a colleague from another organisation consider how these matters are appropriately raised in a timely manner.

2.4 All Departments

Action: Staff/ Volunteers

- 1. All staff and volunteers have a duty to uphold professional boundaries in the workplace and should consider the appropriateness of their actions and behaviours, particularly in the case of Child/Young Person/Vulnerable team members. If any staff or volunteer is unsure, about whether an action is appropriate or not, they should discuss this with a DSL in the first instance.
- 2. Prior to any access with service users/service users' information, you must ensure that you have discussed how to maintain confidentiality and professional boundaries with the relevant DSL.
- 3. If you do not have a satisfactory enhanced Disclosure and Barring Service (DBS) Check (England and Wales), you must ensure that you are not left unsupervised with a Child/Young Person/Vulnerable Adult whilst working for EDClass. Further should a colleague or line manager inadvertently place you in this situation, you must alert them to this fact immediately.
- 4. No mobile phones are to be used during working hours. Staff are not permitted to use mobile phone whilst 'at work' during contracted hours. You must only use your mobile phone during breaks and in a designated area.

Management are permitted to have mobile phones however managers must remain professional at all times and ensure that use is minimal, discretionary and not in the general office areas and in compliance with our safeguarding principals. Failure to do so could result in disciplinary action.

3. Responding to a Safeguarding/Child Protection Concern

3.1 A service user discloses information to you about abuse or harm that they are experiencing (in person/on the phone/via email/via messenger/via EDClass platform)

Action: Person receiving the information

 Always offer reassurance, listen to and take seriously, what they are saying or what they have written, if the disclosure is via email/messenger. Never promise to keep secrets. Never be persuaded by the service user or family not to act if you are worried that a child is being harmed or is at risk of harm.

- 3. It is not your job to investigate, verify what is being said or examine the child or vulnerable adult; this is the statutory responsibility of the school/local authority/child protection services and/or the Police. However, it is important to get relevant information and it may be necessary to undertake some limited enquiries before making a referral, including full name, age, contact details (such as email address/telephone etc) and any involvement with EDClass' services and a brief outline of what happened/situation etc.
- 4. Immediately consult with your Senior Designated Safeguarding Lead (or in their absence a deputy safeguarding lead) to agree the course of action but do not delay if this would place a service user at increased risk.
- 5. Explain the process to the service user that you will need to pass this information on and the reasons why and possible actions.
- 6. If the content within any disclosure is non-school related
 - a. Contact the school and ask to speak with either the contact we have OR their Designated Safeguarding Lead. Inform them verbally about the disclosure and provide details. Immediately follow up with an email using a Safeguarding Incident form.

If content within any disclosure is school related

b. About a teacher – The Senior DSL will

- I. Contact the school and ask to speak with the Designated Safeguarding Lead or the Head Teacher.
- II. Inform them verbally about disclosure and provide details.
- III. Inform them you will be letting their Local Authority Designated Officer (LADO) know as a matter of our procedures.
- IV. Immediately follow up with a written record using the Safeguarding Incident Form.
- V. Inform Local Authority Designated Officer (you will have to google details for local area the partner school is located putting in for example 'Local Authority Designated Officer Sheffield'). This <u>HAS</u> to be done within 24 hours. If they are unavailable contact the local Safeguarding Team. <u>DO NOT</u> leave it. Again, follow up to the person you have spoken with, with a written record using a Safeguarding Incident form.
- c. About the Head
 - I. Inform Local Authority Designated Officer (you will have to google details for local area the partner school is located putting in for example 'Local Authority Designated Officer Sheffield'). This <u>HAS</u> to be done within 24 hours. If they are unavailable contact the local Safeguarding Team. <u>DO NOT</u> leave it. Again, follow up to the person you have spoken with, with a written record using a Safeguarding Incident form.
 - II. Inform Safeguarding Lead of School as a matter courtesy of action you have taken.

If you receive details from the service user that they are in immediate danger advise them to call the police and that you must call the police and pass the information on to their School and local child protection services.

6. If the child contacts EDClass BUT is not in receipt of any EDClass Service and not in immediate danger, advise them they need to contact or offer to contact on their behalf:

- a. Their local authority for support and advice; or
- b. Childline (0800 1111)
- c. NSPCC
- d. Action on Elder Abuse on 0808 808 8141



- e. Mencap Learning Disability Helpline 0808 808 1111
- f. VoiceUK 0808 802 8686
- g. Respond 0808 808 0700
- h. Samaritans 116 123 (FREE) Complete a template for Recording a Safeguarding Incident form any information you have.

7. When a Safeguarding Incident form is completed, store in accordance with the Recording Policy for EDClass.

8. The Senior DSL is to ensure that the Managing Director is aware of the allegation and the steps that the Senior DSL has taken. This will then be signed off by the Senior DSL and Managing Director.

3.2 Responding to calls from the general public regarding concerns about a child, the safety of a child or the behaviour of an EDClass worker / volunteer

Action: Person handling call

- a. Thank the caller for doing the right thing and speaking up on the service users/child/young person/vulnerable adult behalf.
- b. Ask if the service users/child/young person/vulnerable adult is in immediate danger.
- c. If yes the caller should be informed to dial 999 or should be supported to dial emergency services with our assistance. The Senior DSL should take the incident number from the person calling 999 and call 101 to ensure that that caller made the call and appropriate action is being taken by the relevant police force.
- d. If not in imminent danger, ask if the concern is about the behaviour of an EDClass member of staff, volunteer? If yes, please speak to a DSL immediately after the phone call is concluded. Then the DSL will refer the concern to the Senior DSL.
- e. If the concern does not involve a member of EDClass staff, the caller should be directed, as appropriate, to:
 - i. The school responsible for the service user.
 - ii. Their local authority who will provide information and support.
 - iii. The National Association for People Abused in Childhood (Historical Abuse -0800 085 3330).
 - iv. Record using the Safeguarding Incident Form: date and time of the call, contact name and number of the caller (if they give it), as much information as possible e.g. gender, ethnicity and age of the child or young person the concern is about, a brief description of the nature of the concerns raised and to whom you passed the information or caller on to. Do not try to elicit this information if the person does not want to provide it. The record of the incident must be used and stored in a confidential area. The form must be completed as soon as possible.
 - v. Pass this information to the Senior DSL for a decision regarding next steps.

4. Reporting and Managing Safeguarding Allegations against Staff and Volunteers

These procedures must be used when any staff, volunteer or other worker or other adult has:

- ✓ Behaved in a way that has harmed a service users/child/young person/vulnerable adult
- ✓ Possibly committed a criminal offence against, or related to a service users/child/young person/vulnerable adult
- ✓ Behaved towards a service users/child/young person/vulnerable adult in a way that indicated s/he is unsuitable to work with children

4.1 Reporting Allegations and Serious Incidents



Action: Line Manager

1. If a member of your team is involved in a serious safeguarding incident you must report it to your Senior DSL and complete a serious incident/allegation form immediately after witnessing the incident.

4.2 Responding to a safeguarding allegation against worker or volunteer

Action: Person who has a concern about a worker/volunteer's or others behaviour or receives a concern from a member of the public/service user

- 1. If the allegation involves a staff member or volunteer this should be referred to the Senior DSL immediately.
- 2. Do not investigate the concerns yourself.
- 3. If for any reason you do not feel able to alert the Senior DSL then the whistleblowing procedure must be followed.

Action: Senior DSL

- 4. Upon receiving information ensure that the safety of any service users/child/young person/vulnerable adult child or young person is paramount. If a crime has been committed the Senior DSL will contact the police and relevant external bodies. The matter should also be referred immediately to the local child protection services; and in England the Local Area Designated Officer (Rotherham LADO 01709 336 080) should be informed. If other children are also at risk (e.g. other children in the household of the alleged perpetrator), you must also pass on these concerns and any known details.
- 5. Advice should be sought from the Safeguarding Advisor (Milly Wildish) the allegation is serious or unclear.
- 6. Conduct a risk assessment within 24hrs or more urgently, to decide whether the person concerned can continue in their role or whether a period of suspension is required or a temporary redeployment is appropriate.
- 7. Do not inform the member of staff/volunteer against whom the concern/allegation has been made of the nature of the allegation until consultation has been undertaken with the relevant Local Authority and where necessary the Police. The Managing Director must agree with the Senior DSL's decision.
- 8. If the allegation concerns a volunteer then a decision must be made as to whether to suspend their volunteering activities whilst the investigation takes place. This must be confirmed in writing.
- 9. If the allegation involves a service user then you must consider whether the Service User Record should be sealed. The Senior Designated Safeguarding Lead would immediately arrange this.
- 10. An investigating officer must be competent in child protection matters and be of sufficient seniority to enter into discussion with external agencies. Any action must be agreed with the Local Authority Designated Officer. These procedures must be followed in conjunction with Disciplinary Procedures.
- 11. As soon as possible, agree with the Local Authority Designated Officer who will ensure that parents/carers or children are kept informed about the allegation and how they will be kept updated on any progress of the case and its outcome.
- 12. Ensure that staff who are involved in an investigation are aware of support options.

4.3 Developing Media strategy in response to safeguarding allegations

Action: Senior DSL

1. Any media response must be co-ordinated in conjunction with Local Safeguarding Children Board (LSCB) to avoid contradiction and misunderstanding.



2. No public statements about the situation should be released without authorisation from the Managing Director.

Online safety & social media

5.1 Communicating with service users via email, text message or instant message

Action: Staff and volunteers

- 1. The use of smart technology should always be within the context of a planned and supervised piece of work, on the EDClass platform. It must be done with secure equipment and consistent with EDClass' Safeguarding Code of Conduct and professional boundaries.
- 2. Responsible workers and managers must ensure that any use of digital technology is discussed as part of supervision, risk assessed and any decision recorded.

5.2 Taking and retaining digital images and photographs and the use of camera phones

Action: All staff/volunteers

- 1. Where events are taking place and there are any children or young people present, consent from parents or carers must be given. Staff must also apply professional judgement, consistent with the Safeguarding Code of Conduct and this Policy as to whether photography and filming is appropriate in given circumstances, with the agreement of all parties, and after assessing any risk. In relation to staff and volunteers they must only use EDClass equipment for this purpose.
- 2. Photographic data related to work with service users must be stored in a confidential area. Any other photographs or footage must have an identified retention period, which reflects the purpose for retaining the images and is in line with GDPR. When the retention date is reached, they must be securely deleted from electronic storage and corresponding paper/soft copies securely shredded.

6. The 'Prevent' Duty

Radicalisation is comparable to other forms of exploitation and is therefore considered a safeguarding issue that all staff must be aware of. The process for escalating concerns and procedures on how to make a referral to the relevant authorities on this specific matter follow below.

The Prevent Concern promotes a multi-agency approach. There is no expectation that EDClass will take on a surveillance or enforcement role as a result of fulfilling any Prevent duty and where necessary EDClass will work alongside Schools, MAT's, Local Authorities and Local Safeguarding Children Boards.

Extremism is defined in the Prevent duty as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

Terrorism is defined by the Terrorism Act 2000 as: an act that endangers or causes serious violence to a person/people and/or damage to property; or seriously interferes with or disrupts an electronic system.

Radicalisation is defined as the process by which people come to support terrorism and violent extremism and, in some cases, to then participate in terrorist groups. Radicalisation should be considered as an 'additional vulnerability' under Working Together to Safeguard Children Guidance (2018). There is no obvious profile of a person likely to become involved in extremism or a single indicator of when a person might move to adopt violence in support of extremist ideas.

Please view Section 19 for our Prevent Policy

Should a worker have any concerns about a service user/Child/Young Person or Vulnerable Adult as a result of:

- ✓ A direct disclosure
- ✓ An observation
- ✓ An expression of concern or complaint made by another person

The following procedures should be followed:

6.1 Making a Report

6.2 If you suspect that a service user is at immediate risk or actually engaged in the planning or implementing of an act of terrorism, or may be under the influence of radicalisation or extremism but not in immediate danger take the following course of action immediately:

a) Contact your Senior DSL who will speak with the school immediately. The school and the Senior DSL will work in partnership to work through the PREVENT Referrals process.

If you suspect a child/adult at risk is at immediate risk or actually engaged in the planning or implementing of an act of terrorism, take the following course of action immediately:

- a) Contact the Senior Designated Safeguarding Lead
- b) Make a referral to the Police on 999 Or Contact the Anti-Terrorist Hotline on 0800 789 321
- c) All actions must be recorded on the Prevent incident Form.

6.3 If you suspect that a child/young person/vulnerable adult may be under the influence of radicalisation or extremism <u>but not in immediate danger</u>:

- a) Raise your concern directly with the DSL informing her the nature of your concerns.
- b) Contact the Police on number 101 to discuss the next steps, requesting to speak to officers with responsibility in relation to Prevent duties.

6.4 Clarify with the Police or Anti-Terrorism hotline the next steps and whether/how feedback will be provided.

Ensure any reported Prevent Concerns are managed in accordance with these procedures and where necessary escalated to the relevant authorities.

7. Events

Action: Relevant Departmental Manager

- Before any event, a risk assessment must be carried out considering who is to attend and the supervision and welfare of any service user/child/young person/vulnerable adult. The risk assessment must also be carried out in conjunction with partner agencies (for example schools) where applicable.
- 2. Photographs/video must not be taken without parental consent. If consent is given, photographs must be on EDClass issued secure IT digital equipment.
- 3. Should you have any concerns about any event, or are worried that risk is not being appropriately managed, you should speak to your Senior DSL.
- 4. Should any concerns or issues arise during the course of the event/visit these should be discussed with the Senior Designated Safeguarding Lead and escalated immediately to the Managing Director.

8. Information Sharing/Consent

Refer to



- ✓ Information Sharing policy of EDClass and that of the school
- ✓ GDPR Sharing policy and that of the school

9. References and associated guidance

- ✓ September 2023. Department for Education: Keeping children safe in education. Statutory guidance for schools and colleges.
- ✓ July 2018. HM Government: Working together to safeguard children. A guide to inter-agency working to safeguard and promote the welfare of children
- ✓ March 2015. HM Government: What to do if you're worried a child is being abused. Advice for practitioners
- ✓ Education inspection framework
- ✓ Recording Policy and Procedure
- ✓ Mental Capacity Act 2005 (England)
- ✓ Information Sharing & GDPR Policy
- ✓ The Care Act 2014
- ✓ The Prevent Duty
- ✓ The Serious Crimes Act 2015

10. Compliance

The Managing Director and the Senior Designated Safeguarding Lead will review this policy on at least an annual basis.



Section 16: Ethics Policy

EDClass believes that it is important for the organisation and its employees to maintain high ethical standards in order to preserve its reputation in the marketplace.

Good ethics are important to ensure that the organisation meets not only its objectives in a fair and equitable manner but its wider social responsibilities externally. In addition, the organisation is committed to ensuring high ethical standards within the workplace.

The procedure that follows provides general guidance on ethics and refers to other policies of the organisation where necessary. The procedure will be closely monitored and will be developed as necessary to ensure that it meets the needs of the organisation, its employees and its stakeholders.

Environmental audits will ensure that the organisation is meeting its aims with regard to social impact and ethical behaviour and that its stakeholders perceive the organisation in a positive light.

Procedure

- 1. All employees will be provided with ethics training as part of the induction programme. Ongoing ethics training, as the ethics policy and procedure develops, will be cascaded to employees via management.
- All employees are required to adhere to the organisation's policy and procedure on business ethics. Employees who breach the organisation's policy on business ethics will be subject to disciplinary action up to and including dismissal.
- 3. Partisan and political views must not be shared with co-workers, volunteers, consultants or students/learners.
- 4. Employees who are faced with a potential breach of the business ethics code or have doubts about an ethical choice they are facing should, in the first instance, speak to their line manager.
- 5. The organisation has a handbook which employees are expected to abide by. A copy of the handbook and other policies relevant to this procedure are available on the organisation's website or Cara's office.
- 6. The following areas are included in this procedure. However, this list is not exhaustive and will be developed as required.
 - a. GDPR/Access to employee data.
 - b. Whistleblowing.
 - c. The giving and receiving of gifts.
 - d. Confidentiality.
 - e. Relationships with competitors, suppliers, advertisers, etc.
 - f. Equal opportunities, discrimination and harassment.
 - g. Moonlighting.
 - h. The environment.
- 7. This organisation endorses fully and adheres to the six principles of data protection, as set out in Article 5 of the General Data Protection Regulation (GDPR). These data protection principles are set out in the organisation's Data Protection/Access to Employee Data policy and all employees are expected to familiarise themselves with its requirements. Employees should ensure that they understand how data protection impacts on their particular role, in particular with regard to external suppliers and customers. Employees who have any questions on the organisation's Data Protection/Access to Employee Data policy should speak to their line manager in the first instance.
- 8. The organisation encourages a free and open culture in its dealings between its officers, employees and all people with whom it engages in business and legal relations. The organisation recognises that effective and honest communication is essential if malpractice is to be effectively dealt with and the organisation's success ensured. Employees should refer to the organisation's Whistleblowing policy and procedure

which provides guidance to employees who feel that they need to raise issues relating to the organisation with someone in confidence.

- 9. The organisation does not believe that the giving and receiving of gifts from suppliers and customers is appropriate. In certain circumstances gifts may constitute a bribe. An employee who receives a gift from a customer or supplier, regardless of its value, must inform his or her manager who will liaise with the Senior DSL to decide whether the gift may be kept by the employee or whether it should be returned.
- 10. A confidentiality clause forms part of all employees' statement of particulars/contracts of employment. During the course of employment employees will have access to information of a confidential and sensitive nature. Employees must not disclose to a third party any organisational confidential information, either during their employment or after their employment has ended. Confidential information includes information on the organisation's present or potential customers or suppliers and any information relating to the organisation's business, including marketing, corporate or financial plans.
- 11. The organisation recognises that work may result in friendships and closer relationships developing. Relationships may develop not only with colleagues but suppliers and customers. It is natural for relationships to develop in a working environment. While the organisation has every respect for the privacy of its employees, it asks that all employees consider the impact that personal relationships can have on the organisation.
- 12. The organisation is committed to equality of opportunity and diversity in the workplace. It is the organisation's policy to treat all job applicants and employees fairly and equitably, regardless of their sex, transgender status, pregnancy, maternity leave, age, sexual orientation, religion or belief, marital status, civil partnership status, race, colour, nationality, national origins, ethnic origin or disability. Furthermore, the organisation will monitor the composition of the workforce and introduce positive action if it appears that this policy is not fully effective. Employees are required to conduct themselves in a way that promotes equal opportunities at all times. Good practice will be promoted by senior management and employees will be provided with relevant training. Employees who feel they have been discriminated against or suffered harassment should speak to a member of management immediately. Further information is available in the organisation's Equal Opportunities policy and procedure.
- 13. Employees may seek to take up separate employment with another employer or pursue outside business interests while still remaining employed by the organisation. Although the organisation has no desire to unreasonably restrict an employee's external activities, it must seek to protect its own interests and those of all its employees. Employees will not be permitted to undertake business activities or other work where the organisation considers that this is incompatible with its interests or with the employee's health or safety and, in any event, unless employees have obtained prior written authorisation from senior management. Further information is provided in the organisation's Moonlighting policy and procedure.
- 14. The organisation is committed to conserving the Earth's resources and to do what it can to reduce any negative effects it has on the environment. Employees are required to use the organisation's equipment and materials wisely and reduce wastage where possible. Employees can play a positive role in helping the environment by recycling all non-confidential waste, using printers and photocopiers with care and switching off electrical equipment which is not in use.



Section 17: Self-Harm Policy

Self-harming is when somebody intentionally harms or injures them self. This is often a way of coping with or expressing feelings and emotions that become overwhelming and overpowering to the individual. It most frequently takes the form of cutting, burning or non-lethal overdoses; however, it can be any behaviour that causes injury, no matter how minor or high risk the behaviour.

Self-harm usually starts as a way to relieve the build-up of pressure caused by distressing thoughts and feelings. For some people, self-harming might give them a temporary relief from the emotional pain they are feeling. It is important to know that this relief and feeling better is only temporary because the underlying reason still remains. Soon after feelings of guilt or shame might occur this will then continue the cycle. This can then become someone's normal way of dealing with life's difficulties.

The UK has the highest self-harm rate of any country in Europe with estimates that 400 in 100,000 people selfharm. These figures are likely to be higher as many people do not tell anyone about it. Self-harm can affect anyone however the majority of people who report self-harm are aged between 11 and 25.

Examples of self-harm:

- ✓ Cutting, scratching, biting, scraping or picking skin
- ✓ Hair pulling (this can include eyelashes and eyebrows)
- ✓ Swallowing hazardous materials or substances
- ✓ Burning or scalding
- ✓ Banging or hitting the head or other body parts
- ✓ Scouring or scrubbing the body excessively
- ✓ Swallowing inedible objects (PICA)
- ✓ Risk taking behaviour (Unsafe sexual behaviour, substance mis-use, running in front of moving vehicles)
- ✓ Taking an overdose of prescription or non-prescription drugs
- ✓ Eating Disorders

If there are any threats of self-harm by learners, staff or visitors, please follow the guidelines below:

- ✓ Remove any items that may be a potential threat (for example : sharp objects and wires)
- ✓ Staff to do regular observations on the vulnerable, "at risk" person
- \checkmark Staff to notify the Designated Safeguarding Lead or Deputy Safeguarding Lead

If the person has already self-harmed, please follow the guidelines below:

- ✓ Assess the severity of the injury, and administer first aid, if necessary call for an ambulance
- ✓ Notify the Designated Safeguarding Lead or Deputy Safeguarding Lead
- ✓ If self-harm is revealed it is important to treat the person as an individual and show respect at all times. Do not judge the person, listen to them and encourage them to talk.
 - ✓ Ask how they are feeling.
 - ✓ Do not make them feel guilty.
 - ✓ Let the person know that you want to listen and hear how they are feeling, when they feel ready to talk.
 - ✓ When they discuss it with you be compassionate and respect what the person is telling you, even though you may not understand or find it difficult.
 - ✓ Understand that it is a long and hard journey to stop self-harming. Be aware someone will only stop self-harming when they feel ready and able to do so.

Have honest communication at all time with the person ensuring they are aware all disclosures will be passed on to relevant parties.

Section 18: Child-on-child Abuse Policy

At EDClass Limited, we work in line with Keeping Children Safe in Education 2023, which states that 'Governing bodies and proprietors should ensure their child protection policy includes procedures to minimise the risk of child-on-child abuse and sets out how allegations of child-on-child abuse will be investigated and dealt with'. The document also states it is most important to ensure opportunities of seeking the voice of the child are heard, our setting will ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems are in place for students to express their views and give feedback. Ultimately, any system and processes should operate with the best interests of the child at their heart.' At EDClass Limited, we continue to ensure that any form of abuse or harmful behaviour is dealt with immediately and consistently to reduce the extent of harm to the young person, with full consideration to impact on that individual child's emotional and mental health and well-being.

Purpose and Aim

Children and young people may be harmful to one another in a number of ways which would be classified as child-on-child abuse. The purpose of this policy is to explore the many forms of child-on-child abuse and include a planned and supportive response to the issues. At EDClass Limited we have the following policies in place that should be read in conjunction with this policy: Child Protection Policy, Self-Harm Policy and Modern-Day Slavery Policy.

Framework and Legislation

This policy is supported by the key principles of the Children's Act, 1989 that the child's welfare is paramount. Another key document that focuses adult thinking towards the views of the child is Working Together to safeguard Children, 2018, highlighting that every assessment of a child, 'must be informed by the views of the child' and within that 'It is important to understand the resilience of the individual child when planning appropriate services. (Working Together, 2018) This is clearly echoed by Keeping Children Safe in Education, 2023 through ensuring procedures are in place in schools and settings to hear the voice of the child.

Introduction to abuse and harmful behaviour

Abusive behaviour can happen to children in settings and it is necessary to consider what abuse is and looks like, how it can be managed and what appropriate support and intervention can be put in place to meet the needs of the individual and what preventative strategies may be put in place to reduce further risk of harm. Abuse is abuse and should never be tolerated or passed off as 'banter' or 'part of growing up'.

Types of abuse

There are many forms of abuse that may occur between peers and this list is not exhaustive. Each form of abuse or prejudiced behaviour is described in detail followed by advice and support on actions to be taken.

Physical abuse e.g. (biting, hitting, kicking, hair pulling etc.)

Physical abuse may include, hitting, kicking, nipping, shaking, biting, hair pulling, or otherwise causing physical harm to another person. There may be many reasons why a child harms another and it is important to understand why a young person has engaged in such behaviour, including accidently before considering the action or punishment to be undertaken.



Sexually harmful behaviour/sexual abuse e.g. (inappropriate sexual language, touching, sexual assault etc.)

Sexually harmful behaviour from young people is not always contrived or with the intent to harm others. There may be many reasons why a young person engages in sexually harmful behaviour and it may be just as distressing to the young person who instigates it as well as the young person it is intended towards. Sexually harmful behaviour may range from inappropriate sexual language, inappropriate role play, to sexually touching another or sexual assault/abuse.

Prejudiced Behaviour

The term prejudice-related bullying refers to a range of hurtful behaviour, physical or emotional or both, which causes someone to feel powerless, worthless, excluded or marginalised, and which is connected with prejudices around belonging, identity and equality in wider society – in particular, prejudices to do with disabilities and special educational needs, ethnic, cultural and religious backgrounds, gender, home life, (for example in relation to issues of care, parental occupation, poverty and social class) and sexual identity (homosexual, bisexual, transsexual, pan sexual and transgender).

Expected action taken from all staff

Although the type of abuse may have a varying effect on the victim and initiator of the harm, these simple steps can help clarify the situation and establish the facts before deciding the consequences for those involved in perpetrating harm.

It is important to deal with a situation of peer abuse immediately and sensitively. It is necessary to gather the information as soon as possible to get the true facts around what has occurred as soon after the child(ren) may have forgotten. It is equally important to deal with it sensitively and think about the language used and the impact of that language on both the children and the parents when they become involved.

In all cases of child-on-child abuse it is necessary that all staff are trained in dealing with such incidents, talking to young people and instigating immediate support in a calm and consistent manner. Staff should not be prejudiced, judgemental, dismissive or irresponsible in dealing with such sensitive matters.

Gather the Facts

Speak to all staff who were present and children dependant on age and understanding, using consistent language and open questions. The easiest way to do this is not to have a line of questioning but to ask the young people to tell you what happened. Only interrupt the young person from this to gain clarity with open questions, 'where, when, why, who'. (What happened? Who observed the incident? What was seen? What was heard? Did anyone intervene?)

- ✓ Track evidence through observations, incident reports and CCTV
- ✓ Consider the Intent (begin to Risk Assess)
- ✓ Has this been a deliberate or contrived situation for a young person to be able to harm another?
- ✓ Are staff consistent with behaviour management?
- ✓ Are all new staff to the room informed of the circumstances and required amount of supervision?
- ✓ Are the parents working together with the setting on using the same strategies? And are the parents consistent at home?
- ✓ Decide on your next course of action

If from the information that you gather you believe any young person to be at risk of significant harm you must report to the senior DSL in order for them to make a safeguarding referral to social care immediately (where a crime has been committed the police should be involved also) through the partnership with the specific school,



MAT or Council. If this is the case, once social care has been contacted and made a decision on what will happen next then you will be informed on your next steps.

It may also be that social care feel that it does not meet their criteria in which case you may challenge that decision, with that individual or their line manager. If on discussion however, you agree with the decision, you may then be left to inform parents through the partnership with the specific school, MAT or Council.

Informing parents

If, once appropriate advice has been sought from police/social care you have agreed to inform parents or have been allocated that role from the other services involved then you need to inform the parents as soon as possible. If services are not going to be involved then equally, this information may need to be shared with parents.

The best way to inform parents is face to face. This will be done through the partnership agreement with school, MAT and the councils. Although this may be time consuming, the nature of the incident and the type of harm/abuse a young person may be suffering can cause fear and anxiety to parents whether their child is the child who was harmed or who harmed another.

Points to consider: What is the age of the children involved?

How old are the young people involved in the incident and is there any age difference between those involved? (In relation to sexual exploration, children under the age of 5, in particular 1–4-year-olds who are learning toileting skills may show a particular interest in exploration at around this stage. This, however should not be overlooked if other issues arise)

Where did the incident or incidents take place?

Was the incident in an open, visible place to others? If so was it observed?

What was the explanation by all children involved of what occurred?

Can each of the young people give the same explanation of the incident and also what is the effect on the young people involved? Is the incident seen to be bullying for example, in which case regular and repetitive? Is the version of one young person different from another and why?

What is each of the children's own understanding of what occurred?

Do the young people know/understand what they are doing? E.g. do they have knowledge of body parts, of privacy and that it is inappropriate to touch? Is the young person's explanation in relation to something they may have heard or been learning about that has prompted the behaviour? Is the behaviour deliberate and contrived? Does the young person have understanding of the impact of their behaviour on the other person?

In dealing with an incident of this nature the answers are not always clear cut. If you are concerned or unsure as to whether or not there is any risk involved, please seek advice from Children's Services Social Care.

Repetition

Has the behaviour been repeated to an individual on more than one occasion? In the same way it must be considered has the behaviour persisted to an individual after the issue has already been discussed or dealt with and appropriately resolved?



Next Steps

Once the outcome of the incident(s) has been established it is necessary to ensure future incidents of abuse do not occur again and consider the support and intervention required for those involved.

For the young person who has displayed harmful behaviour

In this circumstance it is important to find out why the young person has behaved in such a way. Particular support from identified services may be necessary through a CAF / strengthening families / early help referral and the young person may require additional support from family members.

Once the support required to meet the individual needs of the young person has been met, it is important that young person receives a consequence for their behaviour. This may be in the form of restorative justice e.g. making amends with the young person they have targeted if this has been some form of bullying.

Even following the conclusion of any investigation, the behaviour that the young person has displayed may continue to pose a risk to others in which case an individual risk assessment may be required. This should be completed via a multi- agency response to ensure that the needs of the young person and the risks towards others are measured by all of those agencies involved including the young person and their parents. This may mean additional supervision of the young person or protective strategies if the young person feels at risk of engaging in further inappropriate or harmful behaviour.

After care

It is important that following the incident the young people involved continue to feel supported and receive help even if they have stated that they are managing the incident. Sometimes the feelings of remorse, regret or unhappiness may occur at a much later stage than the incident.

Preventative Strategies for Settings

It is important to develop appropriate strategies in order to prevent the issue of child-on-child abuse rather than manage the issues in a reactive way.

It is necessary that staff consider each issue and each individual in their own right before taking action.



Section 19: Prevent Policy

The Counter Terrorism and Security Act (July 2015) requires the proprietors of educational facilities to "have due regard, in the exercise of their functions, to prevent people from being drawn into terrorism". This is known as the 'Prevent Duty'.

This policy has therefore been developed in accordance with the principles established by the "Counter Terrorism and Security Act July (2015)" and also "The Children Acts 1989 and 2004"; "The Education Act 2002", and in line with government publications "Revised Prevent Duty Guidance: for England and Wales (2023)", "The Use of Social Media for on-line radicalisation (July 2015)", "Working Together to Safeguard Children (Dec 2023)", Revised Safeguarding Statutory Guidance 2, Framework for the Assessment of Children in Need and their Families (2000) and "What to do if you are worried a Child is being Abused (March 2015)".

This policy should be read in conjunction with the EDClass Child Protection Policy and Safeguarding Adults Policy. The Prevent Duty should be seen as part of our existing safeguarding framework.

Definition

For the purposes of this policy the definition of radical or extreme ideology is "a set of ideas which could justify vilification or violence against individuals, centres or self".

Aims

• To ensure all staff understand the risks of radicalisation within EDClass and how this risk may change from time to time.

• To ensure staff are aware of the Prevent Strategy and are able to protect children and young people who are vulnerable or may be at risk of being radicalised.

• Whilst following the Prevent Strategy EDClass also maintains its mission for diversity to be a core part of all that it does. EDClass places a strong emphasis on the common values that all communities share such as self-respect, understanding, tolerance and the sanctity of life. Learners are taught to respect and value diversity as well as understanding how to make safe, well-considered decisions.

Prevent Leads

Cara Batsford is the Senior Designated Safeguarding/Prevent Lead

Deputy safeguarding leads are Paige Bell, Kim Robinson, Emily Halliday, Sophie Beverley and Kate Redhead.is deputy Designated Safeguarding/Prevent Lead.

Vulnerability to radicalisation or extreme view points from the internet

EDClass recognises its duty to protect all learners from indoctrination into any form of extreme ideology which may lead to the harm of self or others.

This is particularly important because of the electronic information available through the internet EDClass will therefore aim to do the following:

- ✓ Educate learners on the appropriate use of social media and the dangers of downloading and sharing inappropriate material including that which is illegal under the Counter-Terrorism Act.
- ✓ Educate learners through lessons on the concepts of radicalisation and extreme ideology.
- ✓ Inform learners on the importance of Internet Safety both through the ICT lessons and PHSE lessons.



- ✓ In order to safeguard learners from staff who may have extreme or radical views EDClass will:
- Ensure all staff employed by EDClass are carefully vetted and take immediate action if any individual is perceived to be attempting to influence any learners, either physically or electronically.

In order to fulfil the requirements of the Prevent Duty EDClass will:

- Ensure the Designated Safeguarding Lead (DSL) undertakes Prevent awareness training and is able to provide advice and support to other members of staff on protecting children from the risk of radicalisation.
- ✓ Ensure all staff are trained to be vigilant in spotting signs of extremist views and behaviours and that they always report anything to the DSL which may suggest a learner, another staff member or a visitor is expressing opinions which may cause concern. Staff should follow the usual reporting procedures as for any other safeguarding concern as laid out in the EDClass Child Protection Policy.
- Ensure all staff are aware of how to identify and respond to risks to children from extreme or radical views.

Curriculum

EDClass ensures all learners are offered broad and balanced lessons delivered by skilled and qualified teachers that aim to prepare learners for life, encouraging them to be inquisitive learners who are understanding and become tolerant of difference and diversity, whilst also ensuring that they thrive, feel valued and are not marginalised.

Personal, Social, Health and Economics lessons are an effective way of providing learners with time to explore sensitive or controversial issues, and equipping them with the knowledge and skills to understand and manage difficult situations. However, EDClass ensures that embedded within the lessons are opportunities for learners to build resilience to extremism and enable them to develop a positive sense of identity through the development of critical thinking skills.

EDClass values freedom of speech and the expression of beliefs / ideology as fundamental rights underpinning society's values. Learners and staff are encouraged to speak freely and voice their opinions. However, there is an understanding that freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued.

Risk Assessments

The DSL is responsible for carrying out regular risk assessments to assess the risks of learners being drawn into terrorism, including support for extremist ideas which are part of terrorist ideology.

Managing Referrals & Working in Partnership

Any learner who is deemed to be at risk of being radicalised or extremism will be referred by the DSL as appropriate through the Local Authority Channel Referral and Intervention processes. EDClass will then work in partnership with the relevant agencies to seek advice, support and guidance drawing on multi-agency expertise, to support learners at risk of harm.



Section 20: The Early Help Process Policy

"All staff should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from foundation years." – Keeping Children Safe in Education (DfE 2023)

"Early help can also prevent further problems arising, for example, if it is provided as part of a support plan where a child has returned home to their family from care." - Working Together to Safeguard Children (DfE, 2015)

Educational establishments provide universal services to children as part of their safeguarding approach. This includes the ways in which the establishment teaches learners to stay safe, keep others safe and promote a safe culture through their policies and procedures.

Sometimes children and families require some support and intervention in addition to the above and educational establishments can sometimes provide this from within their resources. This additional support could be put in place to improve a child's attendance or behaviour or increase engagement with families with the aim of making life a more positive experience.

It requires multi-agency working so that children and families receive the right support at the right time, in order to prevent difficulties from escalating or needs from increasing. Since educational providers already have regular contact and good relationships with children and families they can often be the most suitable place for some early help to take place.

The early help process

The process for accessing early help will vary in different Local Education Authority (LEA). Each LEA is required to have strategy for early help and procedures for referral and assessment. Many LEAs have an early help hub on their website.

EDClass Limited's responsibilities

The designated safeguarding lead (DSL) - Cara Batsford needs to know about

- ✓ The LEA strategy for early help
- ✓ The process for making early help referrals
- ✓ The early help assessment process
- \checkmark How the LEA expects schools to be part of the early help strategy

The DSL should attend any training on early help offered by the LEA or the Local Safeguarding Children Board (LSCB). As part of early help support and intervention, the DSL may be in the position of being asked to take on the role of lead professional/practitioner.

This role includes:

- ✓ Being the single point of contact for a family
- ✓ Co-ordinating the delivery of agreed action
- ✓ Reducing overlap of services and inconsistencies

More guidance on the role of lead professional should be available in the LEA strategy and the LEA or LSCB may offer additional training about this.

This policy is in addition to EDClass Limited's child protection policy which runs in line with Keeping Children Safe in Education (DfE, 2023). The Senior DSL will ensure that all staff are aware of early help in their LEA.

