



The Access Project

Safeguarding and Child Protection Policy and Procedures

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1. Introduction and Context

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

The Access Project (TAP) believes that the welfare of children within its care is paramount and that a child or young person should never experience abuse of any kind. TAP understands that everyone who comes into contact with children and their families and carers has a role to play in safeguarding children.

All children have a right to protection from mistreatment, abuse, violence and exploitation. TAP will protect all children within its care from abuse equally and without regard to their gender, ethnicity, disability, sexuality or beliefs.

1.1. Scope

- For the purpose of this policy, children are defined as people below the age of 18.
- This policy applies to all members of TAP staff, including all permanent and temporary staff, volunteers, trustees and external service or activity providers.

1.2. Legal Framework

In the application of this policy TAP will adhere to:

- Children Act 1989 and 2004
- UN Convention on the Rights of the Child 1991
- Human Rights Act 1998
- Sexual Offences Act 2003
- Safeguarding Vulnerable Groups Act 2006
- Protecting of Freedoms Act 2012
- Children and Families Act 2014
- Children and Social Work Act 2017
- General Data Protection Regulations 2018
- Working together to safeguard children: a guide to interagency working to safeguard and promote the welfare of children; HM Government 2018.
- Keeping Children Safe in Education 2020.



1.3 Our Policy

TAP is committed to ensuring that all children who are involved with its activities are kept safe from harm and are cared for with the utmost professionalism and integrity. This includes activities held for children at TAP premises, in partner schools, and online, such as one to one tuition and university provision. It also includes activities for children on the Access Project run or supported by TAP staff, trustees, tutors or other volunteers anywhere in the UK or worldwide, or online, such as trips to universities and societies workshops. This policy also applies to all written, electronic and verbal communication with children by TAP.

TAP is committed to informing children involved in activities and their parents about this policy, and the associated procedures. This policy will be publicly available and circulated as appropriate.

This policy is applicable to all staff employed by TAP, and all trustees, tutors and other volunteers associated with TAP. TAP will also strongly encourage partners that it works with on the implementation of projects to adopt their own child protection policies if they have not done so already.

All TAP staff, trustees and volunteers will take any concerns or allegations of abuse against children very seriously. TAP will deal with all concerns and allegations appropriately, with the understanding that it may be necessary to refer them to children's social care services, the independent Local Authority Designated Officer (LADO) for allegations against staff, trustees and other volunteers, and in emergencies, the police.

TAP maintains a high standard in recruiting staff and volunteers. For all staff and volunteers who work with children, DBS (previously CRB) or other police checks will be undertaken and detailed training given in Child Protection policies and procedures. TAP will request an Enhanced DBS disclosure and Children's Banned List information on all volunteers undertaking Regulated Activity with children at or on behalf of TAP. Under no circumstances will TAP permit an unchecked volunteer to have unsupervised contact with children.

2. Types of Abuse

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

There are four types of child abuse as defined in 'Keeping Children Safe in Education' (2020) as follows:

Physical Abuse: physical injury to a child where there is knowledge, or a reasonable suspicion, that their injury was inflicted or knowingly not prevented.

Neglect: the persistent or severe neglect of a child which results in serious impairment of the child's health or development (both physical and mental).

Emotional Abuse: the persistent or severe emotional ill-treatment of a child which has severe adverse effects on the behaviour and emotional development of that child.

Sexual Abuse: the involvement of dependent, developmentally immature children and adolescents in sexual activities they do not truly comprehend, to which they are unable to give informed consent. This doesn't have to be physical contact, and it can happen online.

Other types of abuse include:

Domestic abuse: Witnessing domestic abuse is child abuse, and teenagers can suffer domestic abuse in their relationships.

Online abuse: Online abuse is any type of abuse that happens on the web, whether through social networks, playing online games or using mobile phones.

Child sexual exploitation: Child sexual exploitation is a type of sexual abuse in which children are sexually exploited for money, power or status.

Female genital mutilation (FGM): Female genital mutilation (FGM) is the partial or total removal of external female genitalia for non-medical reasons.

Bullying and cyberbullying: Bullying can happen anywhere – at school, at home or online. It's usually repeated over a long period of time and can hurt a child both physically and emotionally.

Child trafficking: Child trafficking is a type of abuse where children are recruited, moved or transported and then exploited, forced to work or sold.

Grooming: Children and young people can be groomed online or in the real world, by a stranger or by someone they know - for example a family member, friend or professional.



Self Abuse: Any means by which a child or young person seeks to harm themselves. This can take lots of physical forms, including cutting, bruising, scratching, hair-pulling, poisoning, overdosing and eating disorders.

Peer on peer abuse: Abuse of a child by another child. Examples of this include bullying, physical abuse, sexual violence or harrassment, upskirting (taking a picture under another person's clothing without consent), sexting and initiation/ hazing violence and rituals.

Mental Health Concerns: All staff and volunteers should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, by following this child protection policy and speaking to the designated safeguarding lead or a deputy.

Further information regarding indicators of child abuse can be found via this link <https://www.nspcc.org.uk/globalassets/documents/information-service/definitions-si-gns-child-abuse.pdf>

3. Safeguarding Roles and Responsibilities

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

3.1. Staff and Volunteers

All staff and volunteers are responsible for:

- Complying with the Safeguarding Children Policy and Code of Conduct.
- Being alert to the signs of abuse and their need to refer any concerns to the Designated Child Protection Officer;
- Raising any concerns with the designated safeguarding lead as soon as possible or contacting the police/ childrens social services/ NSPCC if a child is at immediate risk of harm;
- Maintaining an attitude of 'it could happen here'. When concerned about the welfare of a child, staff members and volunteers should always act in the interests of the child.

3.2. Designated Child Protection Officer

TAP has a Designated Child Protection Officer to offer training and support to staff and volunteers, to ensure staff and volunteers are vetted in line with safer recruitment procedures and to act as the main point of contact with staff and external agencies in the event of an allegation or disclosure.



If the allegation or indicators of abuse are passed on to TAP, it is the Designated Child Protection Officer's responsibility to collect all relevant information and make decisions on how to proceed. This is most likely to be contacting the Designated Safeguarding Officers in the young person's school, or in exceptional circumstances Children's Social Care or police, who are the investigative agencies.

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

4. Safeguarding Processes and Procedures

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

4.1. How to report any concern

- If a member of staff or a volunteer has identified any signs or indicators that a child/young person is being abused or if a safeguarding incident has occurred, they should immediately contact the Designated Child Protection Officer.
 - Known facts should be recorded in writing and sent to the Designated Child Protection Officer, by completing an incident/ concern form available online [here](#). You can also contact the safeguarding team at stayingsafe@theaccessproject.org.uk
- In the event of an emergency - and the child is at risk - inform the police or children's social services/ NSPCC first and then the Designated Child Protection Officer. Contact numbers can be found in section 10 of this document.
- If an incident occurs in the school the UAO is based in, they should follow the school's safeguarding procedures for reporting a concern. If the student is a part of TAP, they should also inform TAP's DCPO.
- For incidents regarding e-safety concerns, follow the steps in [this](#) flowchart.
- If a student on TAP wishes to raise a concern, they may speak to their University Access Officer directly, or contact the safeguarding team at stayingsafe@theaccessproject.org.uk.

4.2. Responding to a disclosure

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

1. They should be allowed to speak without interruption and encouraged only to disclose information they feel comfortable disclosing. Staff and volunteers should be accepting of what is said and should not ask leading

- questions or conduct any kind of investigation.
2. Staff and volunteers must not promise to keep a secret for a young person - they should advise the young person that will offer support, but that they must pass on information relating to safeguarding concerns. The young person should be reassured that any information will be kept confidential and only disclosed to the Designated Child Protection Officer.
 3. If the young person refuses to disclose anything more, this decision should be respected and the incident should still be reported.
 4. Immediately after a disclosure, the Designated Child Protection Officer should be contacted regarding any student on TAP.
 - In the case of an incident occurring in the school a University Access Officer (UAO) is in, the school's safeguarding procedures should also be followed.
 - In the event of an emergency – and the child is at risk – inform the police or children's social services/ NSPCC first and then the Designated Child Protection Officer.
 5. The incident should be recorded factually in writing using the Online Incident form (Appendix A), including the account provided by the young person using their exact words where possible, without delay.

On being informed of an incident relating to the safeguarding of children and young people, TAP's DCPO (or Deputy) will follow the process in Appendix B and immediately liaise with the school's DSL regarding all incidents or concerns.

If the decision is made by the school's DSL to report to the relevant local authority (which is the local authority where the child or young person lives, or if not known, where the incident occurs), TAP's DCPO will provide the school with any relevant information without delay.

If TAP's DCPO (or Deputy) is not satisfied that the school has reported to the local authority, they should consult the policies of the relevant local authority and in accordance with those policies make a report to the Local Authority Designated Officer (LADO).

4.3. Confidentiality and Handling Data

Child protection information will be stored and handled in line with the principles set out in current data protection legislation and TAP's Data Protection Policy (available on request).

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

When dealing with the personal data of young people:

1. All information should be handled with sensitivity and confidentiality.



2. The information should be kept securely and not be made available to others without the authority of TAP.
3. Dispose of personal data, particularly relating to under 18s, in a confidential manner, by shredding or deleting it when it is no longer needed.
4. Do not use the information inappropriately, especially if it will cause harm to the young person concerned.

5. Safer Recruitment

TAP will ensure that Safer Recruitment practices are always followed and that safeguarding considerations are at the centre of each stage of the recruitment process.

All staff and volunteers must pass the Safeguarding assessments including obtaining DBS clearance, two references and providing satisfactory answers to our safeguarding questions. Any staff or volunteers working in regulated activity with young people will be required to undergo an enhanced DBS check with child barred list check. Every three years, DBS checks must be refreshed or checked against the DBS update service. Staff and volunteers will not be permitted to work in regulated activity at TAP until these checks have been refreshed.

For paid staff at TAP, every interview panel will be overseen by at least two members of staff. We will check on the identity of candidates, follow up references with referees and scrutinise applications for gaps in employment. For our school based members of staff, we may conduct further checks in line with school procedures, such as overseas checks and qualification checks.

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

Offers of employment and offers to volunteer are made subject to satisfactory vetting checks.

6. Training and Supervision

All members of staff and volunteers receive a safeguarding induction and must undertake and pass TAP's online Safeguarding Children training.

Staff working directly with young people are required to attend updated refresher safeguarding training annually.



Volunteers must re-complete their in person or online training with TAP every three years. This training covers detailed information necessary for volunteering with The Access Project in addition to this document.

All members of the safeguarding team, including the Designated Safeguarding Lead and Deputy Designated Safeguarding lead, will undergo updated training for designated leads every two years and in addition to formal training, their knowledge and skills will be refreshed at least annually.

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

We may from time to time drop into volunteer tutorials for quality assurance, safeguarding and feedback purposes. We will contact volunteers prior to doing so to confirm. This is a vital part of ensuring effective delivery, so we require our volunteers to be cooperative with these requests.

7. Allegations against a member of staff or volunteer

At TAP, we recognise the possibility that adults working with our organisation may harm children. It is vital that anyone with concerns about the conduct of a member of staff/ volunteer that seems inappropriate or unsafe feels able to raise these concerns. Concerns must be listened to fairly and equally with all allegations taken seriously. Allegations may arise in a number of ways, such as a concern, suspicion, complaint or report from a child, parent or another adult within or outside of the organisation.

All allegations raised to TAP's Designated Child Protection Officer (DCPO) or CEO will be reported to the Designated Officer(s) (previously the LADO) of the relevant area. It will be up to the Designated Officers to determine whether the reported concerns meet the threshold of an allegation. TAP will work with openness and transparency with all agencies as required within Working Together to Safeguard Children (2018), including the Designated Safeguarding Lead (DSL) of the student's school.

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

For disclosures relating to serious concerns about any aspect of TAP's work, please refer to our [Whistleblowing Policy](#).

8. Staff and Volunteers' Code of Conduct

For all staff and volunteers interacting with young people on the Access Project.

You must:

- ✓ Report any incidents or concerns that a child may be at risk. This includes a requirement under the Prevent duty to report if you suspect that a child or adult at risk may be under the influence of radicalisation or extremism.
- ✓ Operate within TAP's Safeguarding Children Procedures in the event of any disclosure/concern.
- ✓ Encourage young people and adults to feel comfortable enough to point out attitudes or behaviour that are inappropriate.
- ✓ Treat all young people with respect.
- ✓ Only communicate with the young people on the programme in a professional manner.
- ✓ Be sensitive to the needs of young people.
- ✓ Respect a young person's right to personal privacy.
- ✓ Treat all information and data (including photographs and video footage) pertaining to a young person with sensitivity and confidentiality.
- ✓ Avoid being alone with a young person. All face to face tutorials must happen in a public place or in an office meeting room or other public place within the office with a door open, ensuring there are other people present in the tutorial vicinity.
- ✓ Remember that someone else might misinterpret your actions, no matter how well intentioned.
- ✓ Be aware that any physical contact with a young person can be misinterpreted and should always be avoided.
- ✓ Recognise that special caution is required when discussing sensitive issues with young people.
- ✓ Refer to our [Lone worker Policy for Volunteers](#) to risk assess when setting up tutorials.



You must not:

- ✗ Engage in, or attempt to engage in, sexual or inappropriate relationships with a young person on TAP.
- ✗ Make suggestive or derogatory remarks in front of young people or via electronic communication
- ✗ Communicate with a young person from TAP by social media, which includes (but is not limited to) 'LinkedIn', 'WhatsApp', 'Facebook', 'Snapchat' and 'Skype', or in any way that contravenes our [Communication Guidelines for Volunteers](#).
- ✗ Give special rewards or privileges to build up an inappropriate relationship with a young person. Gifts may only be given and received in line with our [Gift Giving policy](#) and you should be aware of your obligations under the *Bribery Act 2010* at all times.
- ✗ Be under the influence of alcohol or other substances when working on activities involving young people.
- ✗ Take photographs of young people without permission from relevant Access Project staff.
- ✗ Transfer the personal data of young people to third parties without express permission from relevant Access Project staff, the young person or their family.
- ✗ Reveal excessive personal details to a young person from TAP (for example, your address).
- ✗ Either exaggerate or trivialise child abuse issues.
- ✗ Discriminate against or harass a young person or any other volunteer or Access Project Staff on the basis of that person's age; disability; gender reassignment; marriage or civil partnership; pregnancy or maternity; race; religion or belief; sex; and/or sexual orientation.
- ✗ Rely on your good name or that of the organisation to protect you.

Any serious breaches may result in a referral being made to the police or the relevant Local Authorities Designated Officer.

9. Online Tutoring

For all online tutoring completed in the name of TAP, we will provide:

- Access to a secure designated tutorial platform, only accessible by the platform provider, staff, volunteers and students on the Access Project.
- Safeguarding training for staff and volunteers.
- Training for TAP staff and optional training for volunteers on how to use the designated online tutorial platform.
- Training on how staff and tutors should conduct themselves in a safe and appropriate manner throughout online tutoring sessions.
- The safe and limited access storage of all data and recordings generated as a result of online sessions. TAP's Data Protection privacy notice can be found here: <https://www.theaccessproject.org.uk/privacy-policy>
- A Designated Child Protection Officer who is responsible for supporting all staff and volunteers involved in TAP's work, ensuring that all TAP staff and volunteers are sufficiently vetted, acts as the main point of contact in the event of any allegation or disclosure, and will ensure our partner schools are communicated with in the event of any safeguarding incidents being reported.

9.1 Online Tutor Code of Conduct

All tutors conducting tutorials for TAP online are required to adhere to the following code of conduct:

- Tutors will only conduct online tutoring with their pupils at the designated tutoring times recommended by TAP - Monday - Friday, no later than 6:30pm start, unless otherwise agreed to by TAP.
- Tutors will only communicate with their students through the forms of communication advised in our [Communication Guidelines](#) document.
- Tutors will conduct online tutoring either in a workplace or location that does not expose personal information or access to inappropriate background content.
- Tutors who are temporarily based abroad for work or educational purposes may request to continue tutoring during their time abroad. Schools have the right to pause tutoring by tutors who are abroad if it is in conflict with their own school policies.
- Tutors and anyone in their household will be fully dressed in smart attire.
- Tutors will remain within the designated tutorial platform for the duration of their sessions.
- Tutors will not record video, still images or audio of any tutoring sessions.
- Tutors will not take any screenshots of sessions that expose the student or any personal information.
- Tutors will conduct their sessions without disruption (mobile phones should be set to silent and away from gaze) or supervision by any other persons not approved by TAP.



- Tutors will not share any links to online content or websites that contain anything other than educational resources that directly link to the content of their sessions.
- Tutors consent to the recording and safe storage of online sessions for six months past the date of recording, unless recordings are deemed to be needed by the Designated Safeguarding Officer. This is for monitoring and safeguarding purposes only.
- Tutors consent to the monitoring of online sessions by TAP staff through live drop in sessions during the tutorial or watching back tutorial recordings.
- Tutors will report any concerns about safeguarding or child protection of students on the Access Project by following TAP's Safeguarding Processes and Procedures.

9.2. Online pupil Code of Conduct

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

- Pupils will only receive online tutoring at the designated tutoring times recommended by TAP - Monday - Friday, no later than 6:30pm start, unless otherwise agreed to by TAP.
- Pupils who receive online tutoring from their home should do so with a parent or guardian supervising.
- Any sessions should be held in appropriate areas of the home, with doors open and a parent/ carer in close proximity during the session.
- Pupils and anyone in their household will be fully dressed in smart attire.
- Pupils will conduct online tutoring in a location that does not expose personal information.
- If broadband speed permits, pupils will keep their video stream 'on' for the duration of their sessions.
- Pupils will have any mobile phones on silent and out of gaze during sessions
- Pupils will not record video, still images that capture personal information or audio of any tutoring sessions.
- KS4 pupils who communicate with their tutor solely through TAP's designated online platform will never disclose their phone, email or other communication details with their tutor nor request those of their tutor through the online platform.
- Pupils will not share any links to online content or websites that contain anything other than educational resources that directly link to the content of their sessions.
- Pupils will not take any screenshots of sessions that expose the tutor or any personal information.
- Pupils consent to the recording and safe storage of online sessions for six months past the date of recording, unless recordings are deemed to be needed by the Designated Safeguarding Officer.
- Pupils consent to the monitoring of online sessions by TAP staff through live



dropins during the tutorial or watching back tutorial recordings.

9.3. Parent/Guardian and/or Responsible Adult Code of Conduct (for home-based online tutoring and provision)

- Parents/Guardians or the named Responsible Adult of pupil's in receipt of home-based tutoring are recommended to supervise their child for the duration of the tutoring session.
- Parents/Guardians or the named Responsible Adult will support their child with basic IT set up, with support from TAP.
- Parents/Guardians or the named Responsible Adult will support their child to attend and engage in as many online tutoring sessions as possible.
- Only pupils enrolled on TAP's programme may be involved in online tutoring sessions with TAP tutors.
- Parents/Guardians or the named Responsible Adult will pass on any concerns about safeguarding immediately to their child's University Access Officer or directly to the Designated Safeguarding Lead through stayingsafe@theaccessproject.org.uk.
- Parents/Guardians or the named Responsible Adult will, to the best of their ability, ensure a safe, quiet and appropriate environment for online tutoring to take place at home for their child.

10. Safeguarding Contact details

Our Designated Child Protection Officer Jennifer Guerin, Deputy Designated Child Protection Officer Cheryl Eaton and Operations Director Stuart Sheldon can be contacted at:

E: stayingsafe@theaccessproject.org.uk

T: Head Office/ Safeguarding: 020 4513 5999 (Option 1 for safeguarding)

If you think a child is in immediate danger, call the police on 999 or children's social services/ the NSPCC straight away

Contact details for local council children's social services can be found [here](#)

NSPCC Helpline: 0808 800 5000 (available 24/7)

NSPCC Email: helpline@nspcc.org.uk

NSPCC Website: www.nspcc.org.uk

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

Additional policies from TAP, including the Incident/ Concern form, can be found here - <https://www.theaccessproject.org.uk/safeguarding>

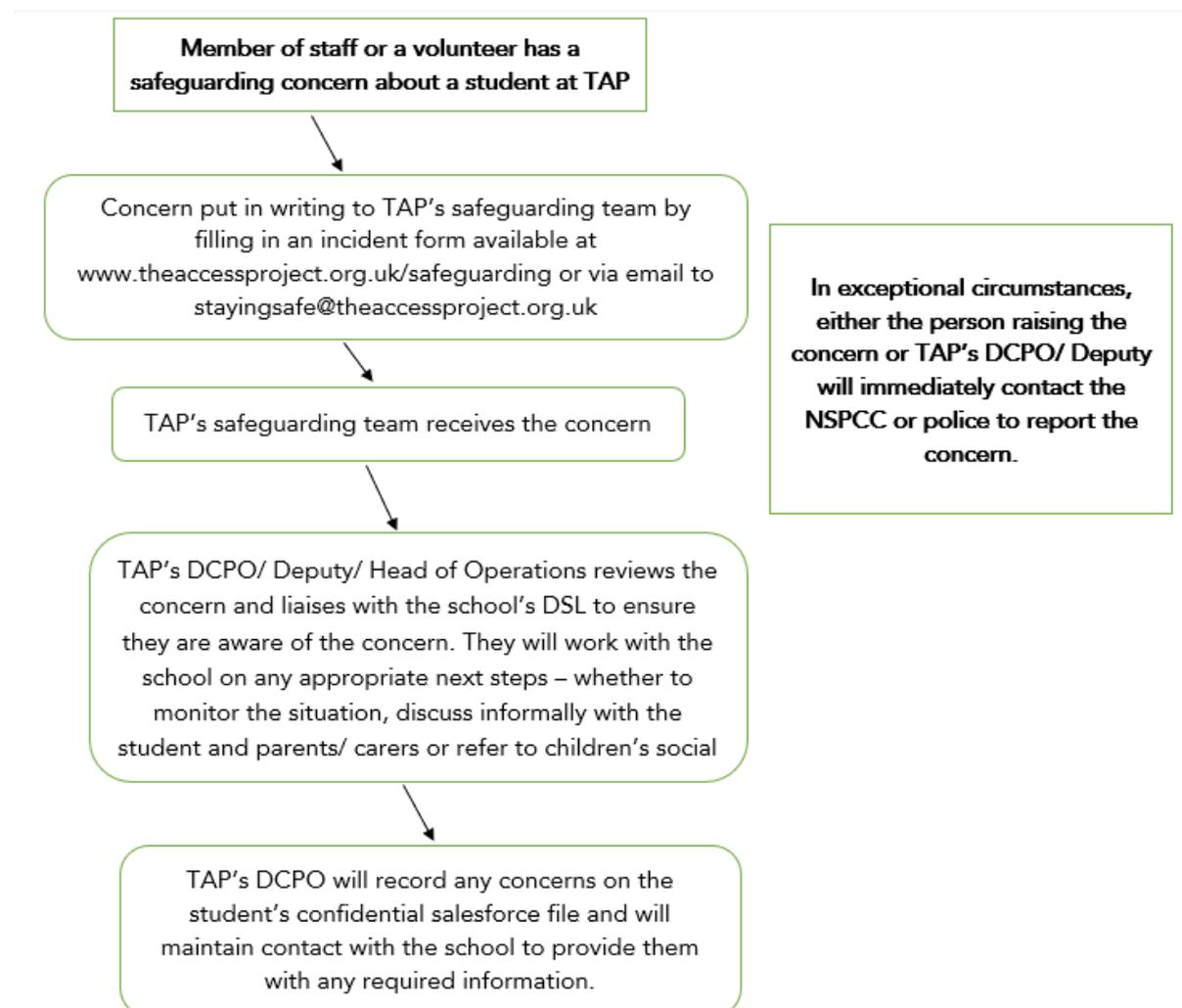


Appendix A - Incident/ Concern Form

Online version available [here](#)

Date of Report	
Name of Access Project student School year/ Age School	
Person reporting: Name, Job role, Contact Details	
Person who raised the concern (if not yourself): Name, Role, Contact Details	
When did the incident occur/ concern arise? Date and time	
Where did the incident occur/ concern arise?	
Witnesses/ Anyone else involved Name, Age (if under 18), Contact details	
What happened? (Factual information only - Use exact words spoken if possible)	
What action has been taken?	
Is the student aware at the moment that the concern has been raised/ incident reported? (Y/N)	
Has the school been informed of the situation? If yes, who has been notified?	
Have external agencies been notified (such as police, social services, Local Authority or NSPCC)? Details	

Appendix B - Reporting a concern



Appendix C - Allegations Procedure

