The Access Project

Safeguarding and child protection policy and procedures

May 2022

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Company number: 07473072 | Charity number: 1143011
Registered address: 128 Aldersgate Street, Barbican, London, EC1A 4AE

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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, tutors and volunteers to share this commitment.

The Access Project believes that the welfare of children within its care is paramount and that a child or young person should never experience abuse of any kind. We understand that everyone who comes into contact with children 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. The Access Project 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 The Access Project staff, including all permanent and temporary staff, tutors, volunteers, trustees and external service or activity providers.

1.2. Legal framework

In the application of this policy The Access Project 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 2021.

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1.3 Our policy

The Access Project is committed to ensuring that all children who are involved with its activities are kept safe from harm and are cared for with the utmost professionalism and integrity. This includes activities held for children at The Access Project premises, in partner schools, and online, such as one-to-one tuition, small group tuition and university provision. It also includes activities for children on the Access Project run or supported by our 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 The Access Project.

The Access Project is committed to informing children involved in activities and their parents about this policy, and the associated procedures.

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

All staff, tutors, trustees and volunteers will take any concerns or allegations of abuse against children very seriously. The Access Project 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, tutors, trustees and other volunteers, and in emergencies, the police.

The Access Project maintains a high standard in recruiting staff, tutors and volunteers. For all staff, tutors and volunteers who work with children, DBS checks will be undertaken at the level appropriate to their role, and detailed training given on Child Protection policies and procedures.

Under no circumstances will we permit an unchecked member of staff, tutor or volunteer to have unsupervised contact with children.

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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 (2021) as follows:

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

Other types of abuse include:

- Domestic abuse: witnessing domestic abuse is child abuse, and teenagers can suffer domestic abuse in their relationships
- Online abuse: online abuse is any type of abuse that happens on the web, whether through social networks, playing online games or using mobile phones
- Child sexual exploitation: child sexual exploitation is a type of sexual abuse in which children are sexually exploited for money, power or status
- Female genital mutilation (FGM): FGM is the partial or total removal of external female genitalia for non-medical reasons
- Bullying and cyberbullying: bullying can happen anywhere – at school, at home or online. It's usually repeated over a long period of time and can hurt a child both physically and emotionally
- Child trafficking: child trafficking is a type of abuse where children are recruited, moved or transported and then exploited, forced to work or sold
- Grooming: children and young people can be groomed online or in the real world, by a stranger or by someone they know - for example a family member, friend or professional
- Self abuse: any means by which a child or young person seeks to harm themselves. This can take lots of physical forms, including: cutting, bruising, scratching, hair-pulling, poisoning, overdosing and eating disorders
- Child on child abuse: abuse of a child by another child. Examples of this include bullying, physical abuse, sexual violence or harrassment, upskirting (taking a picture under another person's clothing without consent), sexting

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and initiation/ hazing violence and rituals

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

Further information regarding indicators of child abuse can be found here.

3. Safeguarding roles and responsibilities

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

3.1. Staff, tutors and volunteers

All staff, tutors 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 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, tutors and volunteers should always act in the interests of the child.

3.2. Designated Child Protection Officer

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

- Offer training and support to staff, tutors and volunteers
- Ensure staff, tutors and volunteers are vetted in line with safer recruitment procedures
- Act as the main point of contact with external agencies in the event of an allegation or disclosure.

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

It is important to remember that The Access Project staff are not investigating officers. At all times, the welfare of the young person is paramount. Swift reporting

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will enable the investigative agency to give advice and take appropriate action.

4. Safeguarding processes and procedures

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

4.1. Responding to a disclosure

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

- They should be allowed to speak without interruption and encouraged only to disclose information they feel comfortable disclosing. Staff, tutors and volunteers should be accepting of what is said, should not ask leading questions (often ending in "weren't you", "didn't they" or similar) and should only prompt the child where necessary with open questions – where, when, what, etc.
- Staff, tutors and volunteers must not promise to keep a secret for a young person - they should advise the young person that they will offer support, but must pass on information relating to safeguarding concerns. The young person should be reassured that any information will be kept confidential and only disclosed to the DCPO.
- If the young person refuses to disclose anything more, this decision should be respected and the incident should still be reported
- Immediately after a disclosure or if a safeguarding incident occurs, the incident must be reported.

4.2. How to report any concern

- If a student on The Access Project wishes to raise a concern, they may speak to their University Access Officer directly, or contact the safeguarding team at stayingsafe@theaccessproject.org.uk
- If a member of staff, a tutor 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 DCPO
    - Known facts should be recorded in writing and sent to the DCPO without delay by completing an incident/ concern form available online here. You can also contact the safeguarding team at stayingsafe@theaccessproject.org.uk
    - The incident should be recorded factually and should include the account provided by the young person, using their exact words where possible.
- In the event of an emergency, and the child is at immediate risk of harm, staff, tutors and volunteers should inform the police first and then the DCPO.

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They can also contact the NSPCC out of office hours or for impartial advice. Contact numbers can be found in section 10 of this document
- If an incident occurs in the school where a University Access Officer (UAO) is based, they should follow the school's safeguarding procedures for reporting a concern. If the student is a part of The Access Project, they should also inform The Access Project's DCPO
- For incidents regarding e-safety concerns, follow the steps in this flowchart.

On being informed of an incident relating to the safeguarding of children and young people, The Access Project's DCPO (or Deputy) will follow the process in Appendix B.

4.3. Confidentiality and handling data

Child protection information will be stored and handled in line with the principles set out in current data protection legislation and The Access Project's Data protection policy (available on request).

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

When dealing with the personal data of young people:

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

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5. Safer recruitment

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

All staff, tutors and volunteers must pass the Safeguarding assessments including:

1. Obtaining DBS clearance
2. Two references
3. Providing satisfactory answers to our safeguarding questions.

Any staff, tutors or volunteers working in regulated activity with young people will be required to undergo an enhanced DBS check with child barred list check. Every three years, DBS checks must be refreshed or checked against the DBS update service. Staff, tutors and volunteers will not be permitted to work in regulated activity at The Access Project until these checks have been refreshed.

For paid staff at The Access Project, every interview panel will be overseen by at least two members of staff. For any interviews for school based members of staff, at least one member of the panel must be trained in safer recruitment. We will check on the identity of candidates, follow up references with referees and scrutinise applications for gaps in employment. For our school-based members of staff, we may conduct further checks in line with school procedures, such as overseas checks and qualification checks.

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

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

6. Training and supervision

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

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

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

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Tutors and volunteers must re-complete their in-person or online training with The Access Project 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 DCPO and Deputy DCPO, will undergo updated training for designated leads every two years and their knowledge and skills will be refreshed at least annually through additional safeguarding e-learning.

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

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

For all events manned by members of staff, including society trips, events and A level results day school drop ins, full training will be provided regarding practical safeguarding considerations and the procedures to follow. Events will be risk assessed in advance with staff required to read and acknowledge these risks, and staff will be encouraged to dynamically risk assess events and provide feedback to the University Events and Enrichment Manager.

7. Allegations

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

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

All allegations raised to The Access Project's DCPO or Chief Executive will be reported to the Designated Officer(s) of the relevant local authority. It will be up to the Designated Officers to determine whether the reported concerns meet the threshold of an allegation. The Access Project will work with openness and transparency with all agencies as required within Working Together to Safeguard Children (2018), including the DSL of the student's school.

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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 The Access Project's work, please refer to our Whistleblowing Policy.

8. Staff, tutor and volunteers' code of conduct

For all staff, tutors 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

Report any indications (verbal, written or physical) that suggest a pupil may be infatuated with a member of staff, tutor or volunteer, and always maintain professional boundaries.

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

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

✓ Treat all young people with respect

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

✓ Be sensitive to the needs of young people

✓ Respect a young person's right to personal privacy

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

✓ Avoid being alone with a young person:

All face-to-face tutorials must happen in a public place or place of work, ensuring there are other people present in the tutorial vicinity

All online tutorials must occur on The Access Project's designated tuition platform.

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

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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

✓ For all those conducting tutorials, complete a weekly compliance form (sent on a Friday) as outlined in the volunteering agreement/role description to ensure accurate reporting of tutorials occurring.

You must not:

✗ Engage in, or attempt to engage in, sexual or inappropriate relationships with a young person on The Access Project

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

✗ Communicate with a young person from The Access Project via 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

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

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

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

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

✗ Either exaggerate or trivialise child abuse issues

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

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religion or belief; sex; gender; and/or sexual orientation

✗ Just 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 authority's Designated Officer.

9. Online tutoring

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

- Access to a secure designated tutorial platform, only accessible by the platform provider, staff, tutors, volunteers and students on the Access Project
- Safeguarding training
- Training for The Access Project staff and optional training for tutors and volunteers on how to use the designated online tutorial platform
- Training on how staff, tutors and volunteers 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. The Access Project's Data protection privacy notice can be found here
- A DCPO responsible for supporting all staff, tutors, and volunteers involved in The Access Project's work.

9.1 Online tutor and volunteer code of conduct

All tutors and volunteers conducting tutorials for The Access Project online are required to adhere to the following code of conduct:

- Tutors and volunteers will only conduct online tutoring with their pupils at the designated tutoring times recommended by The Access Project - Monday to Friday, no later than 6:30pm start, unless otherwise agreed to by The Access Project
- Tutors and volunteers will only communicate with their students through the forms of communication advised in our Communication guidelines document
- Tutors and volunteers will conduct online tutoring either in a workplace or location that does not expose personal information or access to inappropriate background content
- Tutors and volunteers 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, volunteers, and anyone in their household will be fully dressed in smart attire
- Tutors and volunteers will remain within the designated tutorial platform for

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the duration of their sessions
- Tutors and volunteers will not record video, still images or audio of any tutoring sessions
- Tutors and volunteers will not take any screenshots of sessions that expose the student or any personal information
- Tutors and volunteers 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 The Access Project
- Tutors and volunteers will not share any links to online content or websites that contain anything other than educational resources or further reading/tips that directly link to the content of their sessions
- Tutors and volunteers 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 DCPO. This is for monitoring and safeguarding purposes only
- Tutors and volunteers consent to the monitoring of online sessions by The Access Project staff through live drop-in sessions during the tutorial or by watching back tutorial recordings
- Tutors and volunteers will report any concerns about safeguarding or child protection of students on The Access Project by following our Safeguarding processes and procedures

9.2. Online pupil code of conduct

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

- Pupils will only receive online tutoring at the designated tutoring times recommended by The Access Project - Monday to Friday, no later than 6:30pm start, unless otherwise agreed to by The Access Project
- 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/guardian 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
- 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

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

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10. Safeguarding contact details

Safeguarding team

DCPO - Jennifer Guerin
Deputy DCPO - Cheryl Eaton
Operations Director - Stuart Sheldon

Our Safeguarding team can be contacted at:

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

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

Other useful contacts:

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 The Access Project, including the Incident/ concern form, can be found here - https://www.theaccessproject.org.uk/safeguarding

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Appendix A - Incident/concern form

Online version available here

Date of report	
Name of The Access Project student School year/age School	
Person reporting: Name, job role, contact details	
Person who raised the concern (if not yourself): Name, job 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 the police, social services, Local Authority or NSPCC)? Details	

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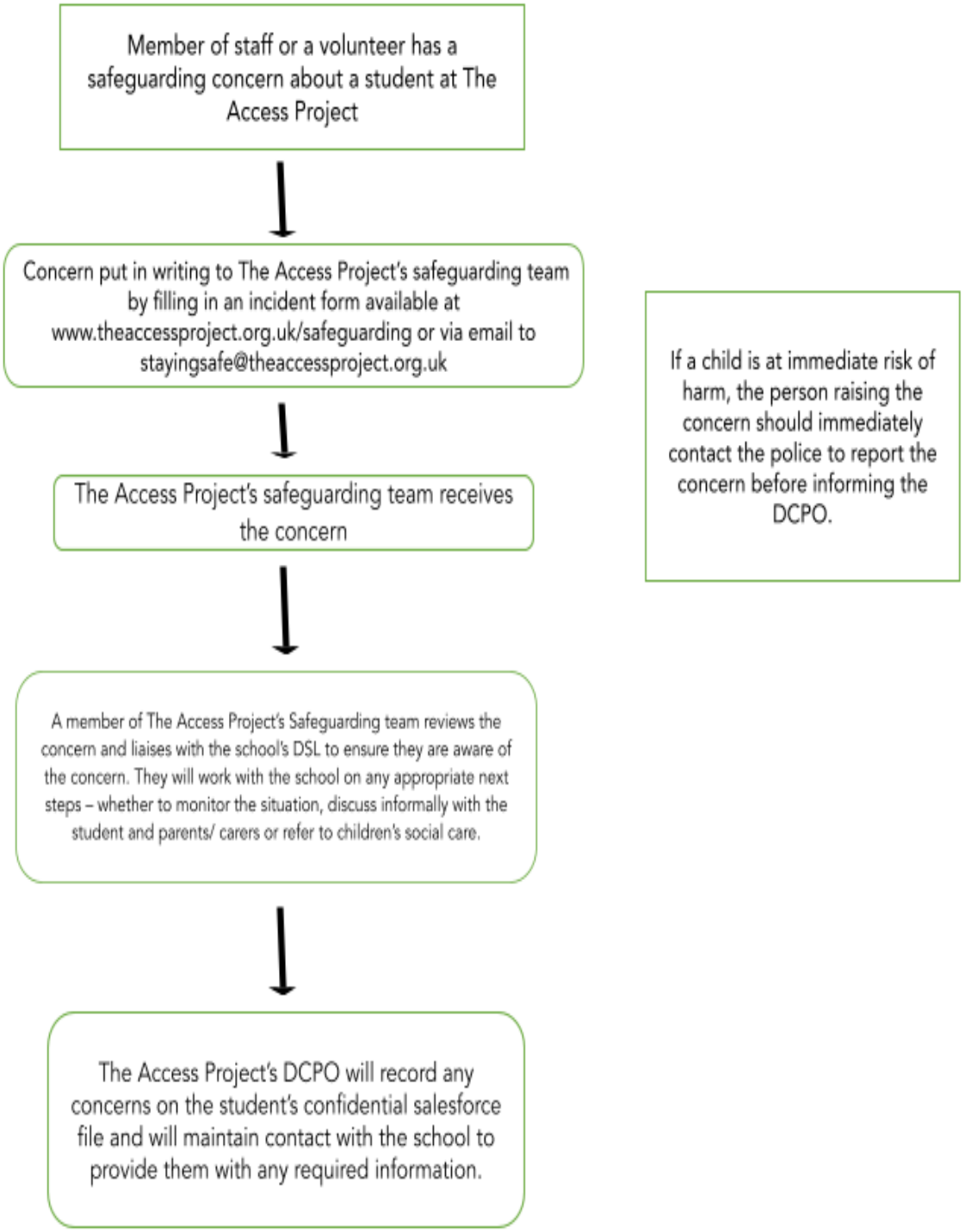
Appendix B - Reporting a concern



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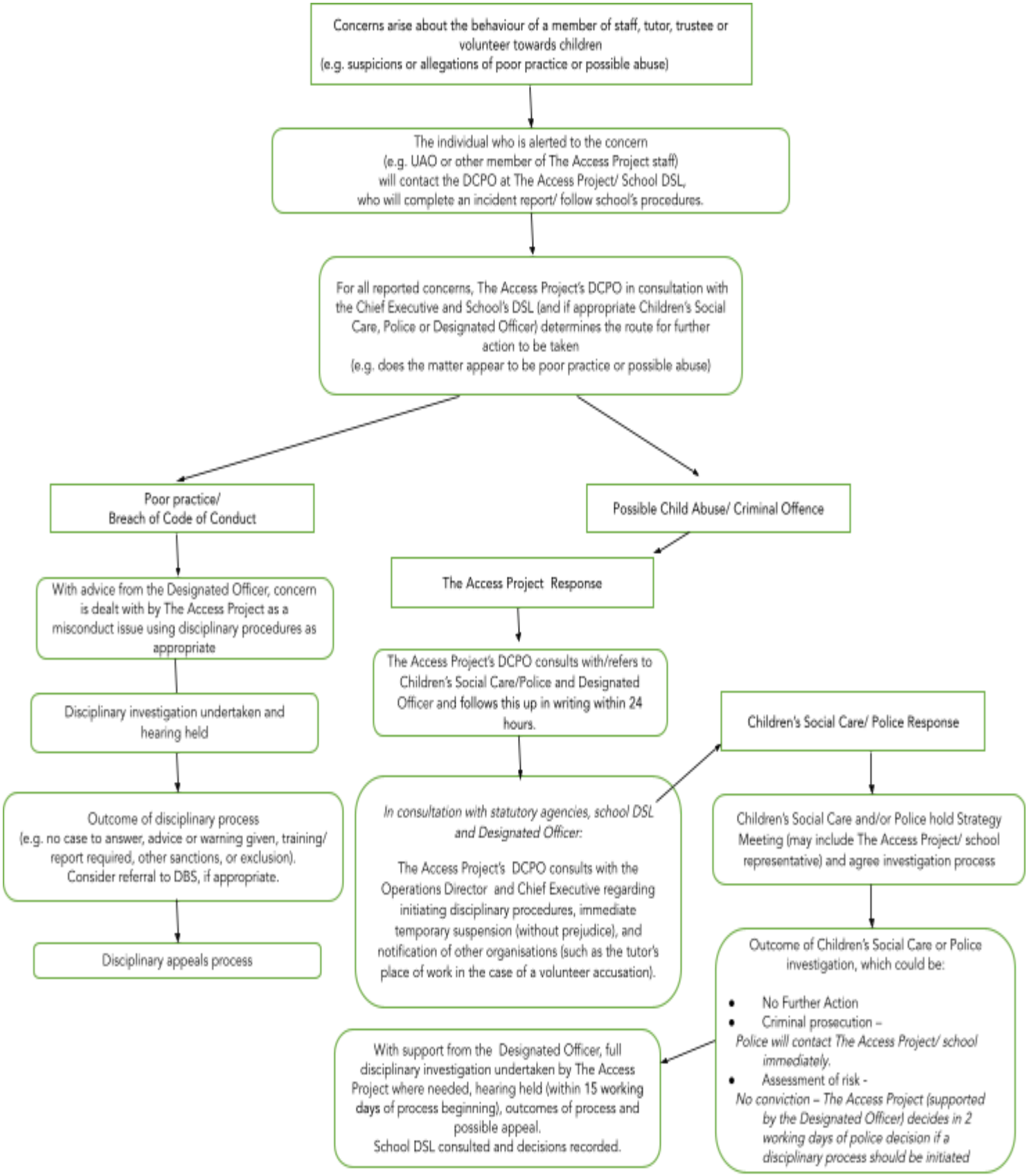
Appendix C - Allegations procedure



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