



**Safeguarding and Child  
Protection Policy**

2023 - 2024

## Policy issue and updates

<b>Pages</b>	<b>Issue No.</b>	<b>Date</b>
Whole Document – review after transition to Progress Education Division	1	March 2020
Whole document – annual review	2	August 2020
Whole Document – annual review	3	August 2021
Whole Document – annual review	4	August 2022
Whole Document – annual review	5	August 2023

The following policy has been approved by the Wider Leadership Team at Progress Careers.

The policy will be reviewed on an annual basis unless circumstances arise requiring the policy to be reviewed earlier.

Approved by Managing Director (Paula M Thompson): August 2023



Planned review: August 2024 (or as necessary)

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## 1. Policy overview

- 1.1 Progress Careers recognises our statutory responsibility to safeguard and promote the welfare of all young people. We will endeavor to provide and offer a safe and welcoming environment where children are respected and valued. We will be alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection, and justice.
- 1.2 Safeguarding is everyone's responsibility. We recognise that we are part of a wider safeguarding system and work closely with our partnering schools and other agencies in the areas we work, to promote the welfare of children. We maintain an attitude of 'it could happen here' and will consider the wishes of, and at all times, what is in the best interests of each child we work with.
- 1.3 We understand that children can be abused by adults or by other children. We are committed to creating a culture of safety, that minimises the opportunity for any form of abuse (including all forms of peer on peer abuse) through training, education and robust response procedures.<sup>1</sup>
- 1.4 The aim of this policy is to;
  - promote safeguarding and child protection and to provide information about how we work to keep children safe;
  - ensure that all staff are aware of and clearly understand their statutory safeguarding responsibilities;
  - provide all members of staff with the information required to meet their safeguarding duty and protect children from harm;
  - provide stakeholders with clear information relating to the our safeguarding and child protection procedures; and to
  - ensure that we are protecting children from maltreatment or harm.

## 2. Scope

- 2.1 This policy applies to all members of the Progress Careers team including but not exclusively the Wider Leadership Team, Regional Co-ordinators, Careers Advisers, Careers Co-ordinators, Administrative colleagues, trainees and the wider group working in or on behalf of Progress Careers. All references in this document to 'staff' or 'members of staff' should be interpreted as relating to the aforementioned unless otherwise stated.

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## 3. Definitions

- 3.1 **Safeguarding and promoting the welfare of children** is defined in Keeping Children Safe in Education (KCSIE) updated Sept 2022 as;
- protecting children from maltreatment;
  - preventing impairment of children’s mental and physical health or development;
  - ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
  - taking action to enable all children to have the best outcomes.
- 3.2 For the purposes of this policy, the term ‘safeguarding’ refers to everything that the company does to keep children safe and promote their welfare, including (but not limited to):
- Supporting pupils’ health, safety and well-being, including their mental health.
  - Meeting the needs of children with special educational needs and/or disabilities.
  - Meeting the needs of children with medical conditions.
  - Educational visits.
  - Emotional wellbeing.
  - Online safety and associated issues.
  - Appropriate arrangements to ensure school security, taking into account the local context.
  - Keeping children safe from risks, harm and exploitation.
  - Child protection.
- 3.3 **Child protection** is part of safeguarding and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.
- 3.4 **Abuse** is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. It can be perpetrated by an adult or adults known or unknown to a child, or a child or children known or unknown to the child. It can happen in person or online. Where abuse is perpetrated by another child, it is known as ‘peer on peer’ or ‘child on child’ abuse.
- 3.5 **Neglect** is a form of abuse and is 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<sup>2</sup>.

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3.6 **Peer on peer abuse** refers to the abuse of a child or children perpetrated by another child or children. Peer on peer abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi nude images and or videos (also known as sexting or youth produced sexual imagery);
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).<sup>3</sup>

3.7 Within this policy:

- **Children** includes everyone under the age of 18.
- **'Parent'** refers to birth parents and other adults in a parenting role for example adoptive parents, step parents and foster carers.
- **'Staff'** or **'members of staff'** refers to all of those mentioned in section 2.1
- Keeping Children Safe in Education (updated 2022) may be abbreviated to 'KCSIE'.

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## 4. Legislation and statutory guidance

- 4.1 Progress Careers adheres to all relevant safeguarding legislation, statutory guidance and guidance from the Local Safeguarding Children Partnership. This includes:

### **Statutory Guidance**

- Keeping Children Safe in Education (2023 – published 01 Sept 2023)
- Working Together to Safeguard Children (2018 updated July 22)
- Multi-agency statutory guidance on female genital mutilation (July 2020)

### **Legislation**

- The Children Act 1989 and The Children Act 2004
  - Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015
  - The Rehabilitation of Offenders Act 1974
  - Safeguarding Vulnerable Groups Act 2006
  - Counter-Terrorism and Security Act 2015 (and the Prevent Duty guidance)
  - The Education Act 2002
  - The Equality Act (2010)
- 4.2 Guidance from the Local Safeguarding Children Partnership can be found using the websites for each local authority we work within.
- 4.3 Progress Careers also has regard relevant to non-statutory guidance relating to safeguarding, including:
- What to do if you are worried a child is being abused (2015)
  - Guidance for safer working practice for those working with children and young people in education settings (2019 and the addendum added April 2020)
  - Sexual violence and sexual harassment between children in schools and colleges (2021)
- 4.4 This policy links with other policies and procedures, including:
- Staff Code of Conduct
  - Complaints policy
  - Health and safety policy
  - E-safety and virtual guidance policy
  - SEND policy
  - Equality, Diversity and Inclusion (EDI) policy
  - GDPR, Data Protection and Privacy policy

## 5. Equality statement

- 5.1 We are committed to anti-discriminatory practice and recognise children's diverse circumstances. Some children are at an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We ensure that all children have the same protection, regardless of any barriers they may face.
- 5.2 Please see Section 11 for further details about how we work to support children with special educational needs and disabilities (SEND).

## 6. Confidentiality and information sharing

- 6.1 Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. Schools and colleges have clear powers to share, hold and use information for these purposes. The General Data Protection Regulations (GDPR) does not prevent, or limit, the sharing of information for the purposes of keeping children safe. Lawful and secure information sharing between schools, Children's Social Care, and other local agencies, is essential for keeping children safe and ensuring they get the support they need.
- 6.2 Progress Careers adheres to the Data Protection Act (2018) and the General Data Protection Regulation (2018). Please see the GDPR and Data Protection Policy for more information.
- 6.3 Sharing information with parents

Progress Careers will ensure the Safeguarding and Child Protection Policy is available publicly via the website and for staff directly during induction.

Where appropriate, we will discuss any concerns about a child with the child's aligned school. The Designated Safeguarding Lead of the school we work within (DSL) will normally decide on the process for contacting parents in the event of a concern, suspicion or disclosure.

If we believe that notifying the parents would increase the risk to the child, we will discuss this with the partnering school / academy before doing so. In the case of

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allegations of abuse made against other children, the partnering school will normally notify all relevant parties.

#### 6.4 Consent

The Data Protection Act 2018 introduced 'safeguarding' as a reason to be able to process sensitive, personal information, even without consent (DPA, Part 2, 18; Schedule 8, 4). All relevant information can be shared without consent if to gain consent would place a child at risk. Fears about sharing information **must not be allowed** to stand in the way of promoting the welfare and protecting the safety of children. All professionals responsible for children should not assume that someone else will pass on information that they think may be critical to keeping a child safe.

As with all data sharing, appropriate organisational and technical safeguards are in place and will be adhered to when processing safeguarding and child protection information.

When considering whether, or not, to share safeguarding information (especially with other agencies), Progress Careers will record who they are sharing that information with and for what reason. If we have taken a decision not to seek consent from the data subject and/or parent that should also be recorded within the safeguarding file.

All staff will be made aware of their duties in relation to Data Protection and safeguarding, particularly in respect of confidentiality. This includes the following:

- Staff should never promise a child that they will not tell anyone about an allegation, as this may not be in the child's best interests.
- Staff who receive information about children and their families in the course of their work should share that information only within appropriate professional contexts.
- Timely information sharing is essential to effective safeguarding.
- Information must only be shared on a 'need-to-know' basis, but consent is not required to share information if a child is suffering, or at risk of, serious harm.<sup>4</sup>



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## 7. Roles and responsibilities

7.1 The Managing Director and Wider leadership Team are responsible for the implementation of this policy and will:

- ensure that this policy is reviewed annually by contributing to suggested amendments;
- ensure that this policy and associated procedures are adhered to by all staff and take action as necessary if not;
- ensure that staff (including temporary staff) and volunteers are informed of our systems that support safeguarding, including this policy, as part of their induction.
- ensure that all staff are made aware of the named lead for safeguarding and the Designated Safeguarding Lead of the organisation and host schools they work in;
- ensure that all recruitment follows the safer recruitment and a single, central record is maintained with details of all members of staff who are in contact with children;
- respond to allegations of abuse against all other members of staff and act as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate;
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required;
- ensure that the organisation works with social care, the police, health services and other services to; promote the welfare of children; provide a co-ordinated offer of early help when need is identified; contribute to inter-agency plans for children subject to children protection plans and to protect children from harm;

7.2 All staff

Staff play a particularly important role because they are in a position to identify concerns in order to provide help for children. All staff;

- have a responsibility to provide a safe environment for children;
- will be trained so that they know what to do if a child tells them that he/she is being abused or neglected, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals;
- will be able to identify indicators of abuse and neglect;
- will be made aware of systems in the schools that they work in, that support safeguarding and child protection;
- will be made aware of safeguarding issues that put children at risk of harm and behaviours associated with these risks;

- should ensure that they know what to do if a child makes a disclosure of abuse and never promise confidentiality when a child makes a disclosure;
- will be made aware of and should be clear on the school's or college's policy and procedures with regards to peer on peer abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it;
- may be required to support social workers and other agencies following a referral;
- should be prepared to make referrals if they have concerns about a child's welfare and understand the role that they may be expected to play in such assessments;
- will receive regularly updated safeguarding and child protection training to cover all of the above, as well as online safety;
- will receive safeguarding updates throughout the year as part of continuous professional development;
- should always seek advice from the Designated Safeguarding Lead in their schools or the Managing Director of Progress Careers if they are unsure;

All staff will be made aware of our systems and documents that support safeguarding, including this policy and the staff code of conduct.

All staff that work directly with children will be signposted to a copy of, and must read, *Keeping Children Safe in Education (September 2021 – updated Sept '22)* annually and will receive annually updated training on their safeguarding roles and responsibilities. Staff that do not work directly with children will be also be expected to carry out the same training.

Although there are extensive mechanisms in place to support staff understanding in relation to safeguarding and child protection, there is an expectation that if staff are unclear on any aspects of the safeguarding policy or practice, they speak to the Designated Safeguarding Lead within their school (or the Wider Leadership Team at Progress Careers) without delay, so that additional training can be put in place.

## 8. Recognising abuse: Training

- 8.1 Progress Careers is committed to continuous professional development and all staff undergo rigorous and ongoing safeguarding training. We strive to ensure that staff fully understand their safeguarding responsibilities, that training promotes a culture of safeguarding and equips staff with the skills to identify any signs of abuse, neglect or harm.

## 8.2 All staff

- All staff members will undertake safeguarding and child protection training at induction (including online safety and whistle-blowing procedures) to ensure they understand the safeguarding systems, their responsibilities and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from the three safeguarding partners.
- All staff will have training on the government's anti-radicalisation strategy Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.
- Staff will also receive regular safeguarding and child protection updates (for example, through emails, e-bulletins and staff meetings) as required, but at least annually.
- Volunteers and trainees will receive appropriate training, as applicable.

## 8.3 Safer Recruitment – interview panels

At least one person conducting any interview for a post at the organisation will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, KCSIE (2021), and will be in line with local safeguarding procedures.

## 8.5 Supervision

Safeguarding concerns, logs and referrals will be sampled by staff across the wider group to ensure processes are adhered to. Where staff need additional training or support, this will be implemented.

## 8.6 Specific safeguarding issues

Staff will also be guided to specific training on the following issues and action will be taken if the organisation suspects that a child is at risk of or is the victim of;

- physical abuse;
- sexual abuse;
- child sexual exploitation;
- emotional abuse;
- neglect;
- child criminal exploitation (including involvement in county lines);
- domestic abuse;
- fabricated or induced illness;
- faith-based abuse;
- female genital mutilation;
- forced marriage;
- gangs or youth violence;
- gender-based violence;

- hate;
- online safety;
- peer on peer abuse;
- radicalisation;
- relationship abuse;
- serious violence;
- sexual violence or sexual harassment (including peer on peer abuse);
- sexting or sharing of youth produced sexual imagery;
- so-called 'honour-based' abuse;
- trafficking and modern slavery.

## 9. Recognising and responding to abuse: How to take action

- 9.1 If a member of staff is concerned about a student's welfare, they should report it to the host school DSL as soon as possible. On occasions when the DSL is not available, it should be reported to the deputy safeguarding lead/s without delay. If in exceptional circumstances, the DSL (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from local children's social care.
- 9.2 Although any member of staff can make a referral to children's social care, where possible there should be a conversation with the DSL. All staff must follow the procedures set out in each individual school policy and procedure in the event of a safeguarding issue.
- 9.3 All staff will be alert to indicators of abuse (including peer on peer abuse) and will report any of the following to the Designated Safeguarding Lead immediately;
- any concern or suspicion that a child has sustained an injury outside what is reasonably attributable to normal play;
  - any concerning behaviours exhibited by children that may indicate that they have been harmed or are at risk of harm, including unusual changes in mood or behaviour, concerning use of language and/or concerning drawings or stories;
  - any significant changes in attendance or punctuality;
  - any significant changes in a child's presentation;
  - any indicators that a child may be experiencing peer on peer abuse;
  - any concerns relating to people who may pose a risk of harm to a child; and/or
  - any disclosures of abuse that children have made.

#### 9.4 If a child discloses that they are suffering or at risk of suffering abuse

If a child discloses that he or she has been abused in some way, the member of staff/volunteer will:

- listen to what is being said without displaying shock or disbelief;
- accept what is being said;
- allow the child to talk freely;
- reassure the child, but do not make promises which it might not be possible to keep;
- never promise a child that they will not tell anyone - as this may ultimately not be in the best interests of the child;
- reassure him or her that what has happened is not his or her fault;
- stress that it was the right thing to tell;
- listen, only asking questions when necessary to clarify;
- not criticise the alleged perpetrator;
- explain what has to be done next and who has to be told;
- make a written record (see Record Keeping); and
- pass the information to the Designated Safeguarding Lead without delay. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 9.4.2), and tell the DSL as soon as possible that you have done so.

All staff will reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment, nor should a victim ever be made to feel ashamed for making a report.

##### 9.4.2 If a child is suffering or likely to suffer harm, or in immediate danger

If you think that a child is suffering or at risk of suffering significant harm, you must report this to the designated safeguarding lead immediately. On occasions when the designated safeguarding lead is not available, it should be reported to the deputy safeguarding lead without delay or a senior member of staff.

Where possible, there should be a conversation with the Designated Safeguarding Lead but a referral must be made if a child may be suffering or at risk of suffering harm. **Anyone can make a referral to children's social care.** If anyone other than the DSL makes a referral to children's social care or to the police, they should inform the DSL as soon as possible.

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9.4.3 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Where possible, speak to the DSL within the school setting that you are operating first to agree a course of action.

The DSL will decide on the most appropriate course of action and whether the concerns should be referred to children's social care, using the threshold guidance. If it is decided to make a referral to children's social care the parent will be informed, unless to do so would place the child at further risk or undermine the collection of evidence.

All concerns, discussions and decisions should be recorded in writing by the school.

The DSL will provide guidance on the appropriate action and should manage the situation.

## 10. Specific safeguarding issues

### 10.1 Female Genital Mutilation (FGM)

Any staff member who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a pupil under 18 they must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it. Unless they have good reason not to, they should also discuss the case with the DSL who should involve children's social care as appropriate. Any other member of staff who discovers that an act of FGM appears to have been carried out on a pupil under 18 must speak to the DSL and follow our local safeguarding procedures.

The duty for staff mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out must speak to the DSL and follow our local safeguarding procedures.

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## 10.2 Radicalisation and extremism

All schools are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 in the exercise of their functions to have “due regard” to the need to prevent people from being drawn into terrorism. In the event that concerns are raised relating to radicalisation and extremism, the DSL should be informed immediately.

## 10.3 Children potentially at greater risk of harm

The company recognises that some children need a social worker due to abuse, neglect or family circumstances and that abuse and trauma can leave children vulnerable to further harm, as well as educational disadvantage.

We will also take action to work with and promote the positive outcomes of and to protect;

- Children missing education;
- Children missing from home or care.

There are other familial issues that can have a detrimental impact on children. We work with our schools to support children and families in the following circumstances:

- Children facing the court procedures and/or children in the court system.
- Children with family members in prison.
- Children who are homeless.
- Children who need a social worker.

## 10.4 Mental health

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.

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children’s experiences, can impact on their mental health, behaviour and education.

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If staff have a mental health concern about a child will respond to the concern, inform and discuss our concerns with the DSL and seek ways to support the child in our work with the school.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health concern.

### 10.5 Online safety

Our *E-Safety and Virtual Guidance Policy* is set out in a separate document. We ensure that we have effective mechanisms to identify, intervene in, and escalate any incident where appropriate.

All staff are made aware of the policy on Online Safety which sets our expectations relating to:

- creating a safer online environment – including training requirements, filters and monitoring;
- giving everyone the skills, knowledge and understanding to help children and young people stay safe on-line;
- inspiring safe and responsible use and behaviour;
- safe use of mobile phones within school
- safe use of camera equipment, including camera phones; and
- what steps to take if you have concerns and where to go for further help.

Staff must read the *E-Safety and Virtual Guidance Policy* in conjunction with our Code of Conduct in relation to personal online behaviour.

Bring your own device, such as personal mobile phones) is covered in the *E-Safety and Virtual Guidance Policy* and during inductions.

## 11. Students with special educational needs and/or disabilities (SEND)

11.1 We recognise that pupils with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including;

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- pupils being more prone to peer group isolation than other pupils;
- the potential for pupils with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and/or



- communication barriers and difficulties in overcoming these barriers.

We offer extra support for pupils with SEN and disabilities and work closely with our partnering schools to follow their SEND code of practice and to understand each individual student's needs.

## **12. Students with a social worker and those that have previously needed a social worker**

12.1 Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

12.2 Where we are aware that if a young person has a social worker, we will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. We will work closely with the DSL in our schools to identify barriers, challenges and communication channels when looking at destinations and aspirations. For example, it will inform the DSL about:

- Intended destinations
- Intended courses
- Discussions around desire to relocate

## **13. Looked after and previously looked after children**

13.1 We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- Advisers should have relevant information about children's looked after legal status (via communication with partnering schools), contact arrangements with birth parents or those with parental responsibility, and care arrangements

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## 14. Record keeping

- 14.1 All safeguarding concerns, discussions and decisions made and the reasons for those decisions must be recorded in writing. If in doubt about recording requirements staff should discuss this with the Managing Director or Wider Leadership Team.
- 14.2 When a child has made a disclosure, the member of staff/volunteer should;
- record as soon as possible after the conversation. This is to be recorded in the desired format of the host school.
  - not destroy the original notes in case they are needed by a court;
  - record the date, time, place and any noticeable non-verbal behaviour and the words used by the child;
  - indicate the position of any injuries if relevant; and
  - record statements and observations rather than interpretations or assumptions
- 14.3 All records need to be given to the DSL promptly. No copies should be retained by the member of staff or volunteer.
- 14.4 Records will include:
- a clear and comprehensive summary of the concern;
  - details of how the concern was followed up and resolved; and
  - a note of any action taken, decisions reached and the outcome.
- 14.5 Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them. We will hold records in line with our records retention schedule.

## 15. Safer working practice

- 15.1 We work to create and embed a culture of openness, trust and transparency, in which the organisation's values and expected behaviour (as set out in the staff code of conduct) are constantly lived, monitored and reinforced by all staff.
- 16.2 We expect all staff to act with professionalism at all times. To reduce the risk of unsafe or harmful practice, all staff should receive training on safer working practice and should be familiar with the guidance contained in the staff handbook.

### 16.3 Staff use of mobile phones

Staff are allowed to bring their personal phones to work for their own use, but will limit such use to non-contact time when pupils are not present. Staff members' personal phones will remain in their bags or cupboards during contact time with pupils. Staff will not take pictures or recordings of pupils on their personal phones or cameras. If they do, they must transfer these immediately to an approved device and demonstrate to their manager that the data/images have been deleted.

16.6 We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the organisation.

16.7 Further details can be found in the policies listed:

- E-Safety Policy
- Staff handbook and code of conduct
- GDPR/ Data Protection Policy

## **16. Safeguarding concerns about and allegations against members of staff**

17.1 In the event that there is an allegation of abuse against a member of staff, we will adhere to Part 4, Section 1 of KCSIE (2021) and the Local Authority Safeguarding Children Partnership guidance.

Allegations that may indicate that a person would pose a risk of harm if they continue to work in their present position or in any capacity with children in a school or college include:

- staff having behaved in a way that has harmed a child, or may have harmed a child;
- staff possibly committing a criminal offence against or related to a child;
- staff behaving towards a child or children in a way that indicates they may not be suitable to work with children; and/or
- staff behaving or possibly behaving in a way that indicates they may not be suitable to work with children.

This includes behaviour or incidents that have occurred both in schools/colleges and outside of schools/colleges.

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## 17.2 Allegations against staff

If a concern or allegation of abuse arises against any member of staff or volunteer of Progress Careers, it must be reported to the Managing Director without delay. This includes anyone working in or on behalf of the organisation, whether paid or unpaid. Allegations of abuse against staff must be reported to the Managing Director as appropriate and not discussed directly with the person involved.

The Managing Director and People's Manager should consider if the concern or allegation meets the threshold for Designated Officer intervention.

Allegations against staff relating to a position of trust issue will be referred to the Local Authority designated officer within 24 hours. If a child has suffered or may have suffered abuse or harm, a MASH referral will also be made and the police will be contacted if necessary.

A referral to the Disclosure and Barring Service will be made if a member of staff is dismissed or removed from their post as a result of safeguarding concerns, or would have been removed if they had not have resigned.

## 17.4 Safeguarding concerns that do not meet the harm threshold (low level concerns)

In the event that there is a safeguarding concern about a member of staff, we will adhere to guidance outlined in Part 4, Section 2 of KCSIE (2021) and the Local Authority Safeguarding Children Partnership guidance.

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the harms threshold. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the company may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

It is essential that low level concerns are reported. Such behaviours can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse. We will act quickly, proportionately and appropriately in the event of a low level concern, to prevent abuse or harm of a child and to promote a culture of safeguarding. Dealing with low level concerns also

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protects those working in or on behalf of schools and colleges from potential false allegations or misunderstandings.

#### 17.5 Reporting low level concerns

Low level concerns should be reported to the Managing Director.

All low-level concerns should be recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible. These records will be kept on the appropriate HR Platform as part of the personnel file.

The Managing Director may:

- Speak directly to the person who raised the concern (unless it has been raised anonymously).
- Speak to the individual involved and/or witnesses.

The Managing Director will then categorise the type of behaviour and decide on an appropriate course of action. This will be recorded, along with rationale for any decisions made and details of action taken.

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. In the event that patterns and/or wider cultural issues are identified, the organisation will either:

- take action through our disciplinary procedures;
- refer behaviour to the local authority designated officer/s where a pattern of behaviour moves from a concern to meeting the harms threshold; and/or
- revise policies or implement extra training as appropriate, to minimise the risk of behaviour happening again.

We will retain low level concerns information for a period of 1 year after the person has left our employment to ensure it is considered, where necessary, for any potential references.

## **18. Complaints and concerns about organisational safeguarding policies**

- 18.1 Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with low level concerns or allegations of abuse made against staff (see Section 17).
- 18.2 Other safeguarding-related complaints are dealt with in-line with the *Complaints Policy* alongside this policy where applicable.
- 18.3 Whistle-blowing - Please refer to the *Whistle-blowing Policy* for further information on how we safeguard pupils in relation to poor or unsafe practice, or potential failures.