

## Safeguarding Policy

### September 2021

#### Key policy information

Chair of Trustees Contact Details	Patrick Ward patrick.ward@lewisham.gov.uk
Deputy Chair of Trustees Contact Details	Julie Bunn Julie Bunn Julie.Bunn@northyorks.gov.uk
Honorary Secretary Contact Details	Michelle Salter michelle.salter@telford.gov.uk
Policy ratified on	
Signed	

## Contents

1 Introduction.....	2
2 Purpose.....	2
3 Definitions.....	2
4 Scope .....	3
5 Guidance and Legislation .....	3
6 Principles .....	4
7 Key roles and responsibilities .....	4
8 Training.....	5
9 Checking and Assurance .....	6
10 Reporting procedures .....	7
11 Safeguarding Monitoring.....	8
12 Serious Incidents.....	8
13 Complaints and Whistleblowing .....	10
14 Safer Recruitment .....	10
15 Allegations against adults working in connection with NAVSH .....	10
16 Safeguarding Record Keeping .....	13
17 Policy Review.....	13
Appendix A: Useful Contact Details.....	14
Appendix B: The Seven Principles of Public Life (Nolan) .....	14

## **1 Introduction**

- 1.1 The National Association for Virtual School Heads is committed to safeguarding. We recognise that we are responsible for keeping people safe from harm that arises from coming into contact with the work of our charity.
- 1.2 As a charity aiming to improve the educational outcomes of looked after children, previously looked after children and care leavers, we recognise that safeguarding and child protection is an essential part of our work. We understand that safeguarding is everyone's responsibility, and everyone has a role to play in protecting children and vulnerable adults from harm and abuse.
- 1.3 We have a zero tolerance policy on bullying and harassment, as well as any kind of abuse or exploitation.
- 1.4 We recognise that the charity is part of a network of safeguarding partners, and we work closely with relevant bodies to promote the welfare of children.

## **2 Purpose**

2.1 The purpose of this policy is to:

- provide stakeholders with clear information relating to NAVSH's safeguarding procedures and how we work to protect people from harm.
- promote safeguarding and to demonstrate NAVSH's commitment to safeguarding children;
- support in establishing a culture where abuse and misconduct are not acceptable and ensure that anyone coming into contact with the charity is able to raise safeguarding concerns; and to
- ensure that children and vulnerable adults are protected from maltreatment or abuse.

2.2 We recognise that safeguarding children duties apply to any charity working with, or coming into contact with, anyone under the age of 18.

## **3 Definitions**

3.1 Safeguarding means protecting people's health, wellbeing and human rights, and enabling them to live free from harm, abuse and/or neglect. Safeguarding has a particular statutory definition within the context of safeguarding children.

3.2 For the purposes of this policy, safeguarding is defined as;

- protecting all people, including children and at-risk adults, from harm that arises from coming into contact with anyone working on behalf of NAVSH or through our work;
- 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.<sup>1</sup>

3.3 Throughout this policy the National Association of Virtual School Heads will be referred to as 'the charity' or 'NAVSH'.

3.4 'Commissioned services' refers to any individuals or organisations that receive funding from NAVSH.

3.5 'Members' refers to those that pay a subscription to be part of NAVSH (Virtual School Heads within Local Authorities and Associate Members).

## **4 Scope**

4.1 This policy applies to all trustees, employees, members, volunteers and any other commissioned services working for or on behalf of the Charity, either paid or unpaid.

4.2 This policy applies to any activity that is funded by or carried out on behalf of NAVSH, including delivery of activities in person or online.

4.3 This policy is publicly available and can be accessed on NAVSH's website.

## **5 Guidance and Legislation**

5.1 NAVSH adheres to all statutory guidance, Charity Commission guidance and legislation and has regard to all relevant non-statutory government-recommended guidance.

5.2 The charity provides support and advice to Virtual School Heads nationwide. All guidance and advice should align with relevant statutory government guidance (see 5.3).

---

<sup>1</sup> HM Government, Working Together to Safeguard Children (2018)

5.3 This policy has been informed by and should be read in conjunction with;

- Working Together to Safeguard Children (2018)
- Keeping Children Safe in Education (2021)

5.4 This policy should be read in conjunction with;

- NAVSH Safeguarding Behaviour Code
- NAVSH Safer Recruitment Policy
- NAVSH Constitution (April 2021), which contains the Code of Conduct

5.5 This policy has been informed by the Governance Code and the Charity Ethical Principles.

## **6 Principles**

6.1 To enable the charity to meet the objects detailed in its constitution, NAVSH is committed to the following safeguarding principles:

- All children have the right to be protected from harm.
- Safeguarding and child protection is everyone's responsibility.
- All children have the right to grow up in circumstances consistent with safe and effective care.
- Everyone who comes into contact with the charity, regardless of age, gender identity, disability, sexual orientation or ethnic origin has the right to be protected from all forms of harm, abuse, neglect and exploitation.

## **7 Key roles and responsibilities**

### **7.1 The role of the trustees**

7.1.1 We recognise that effective safeguarding can only happen when it is identified as a governance priority. NAVSH has appointed a trustee to have particular oversight over safeguarding. The lead trustee for safeguarding is Michelle Salter.

7.1.2 Although the lead trustee for safeguarding will provide specific oversight, all trustees are responsible for promoting safeguarding. The charity will ensure that it has a balanced trustee board and will not let one trustee dominate its work.

7.1.3 Trustees will work together to ensure that;

- safeguarding is promoted and protecting people from harm is central to the charity's culture;

- the charity has appropriate policies and procedures in place, which are followed by everyone working on behalf of the charity;
- the charity follows relevant statutory guidance, good practice guidance and legislation;
- everyone working for or on behalf of the charity is suitable to act in their roles;
- all charity activity is designed in a way that protects people from any risk of harm;
- everyone working for or on behalf of the charity know how to identify and handle safeguarding concerns in a full and open manner;
- NAVSH has a clear system of referring and/or reporting safeguarding and child protection concerns or allegations of misconduct or abuse against staff to relevant organisations as soon as they are suspected or identified;
- The charity is quick to respond to concerns and carry out appropriate investigations and will not downplay concerns or ignore failures;
- the charity sets out risks and how they will be managed in a risk register and regularly reviews this;
- the charity has enough resources, to safeguard and protect people; and the trustees;
- will conduct reviews of safeguarding policies, procedures and practice, including drawing together an annual report to assist in scrutinising safeguarding practice.

7.1.4 The charity trustees will make available to each new charity trustee, on or before their first appointment:

- The Safeguarding Policy
- The Safeguarding Behaviour Code
- The Safer Recruitment Policy
- The NAVSH Constitution, which contains the Code of Conduct

## 8 Training

8.1 NAVSH is committed to continuously developing awareness and understanding of safeguarding issues.

### 8.2 All trustees:

- Read 'Working Together to Safeguard Children'<sup>2</sup> upon appointment and when any updates to this document are released.
- Read the Charity Commission guidance 'Safeguarding and protecting people for charities and trustees'<sup>3</sup> upon appointment and when any updates to this guidance are released.

<sup>2</sup> <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

<sup>3</sup> <https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees>

- Read all relevant NAVSH policies upon appointment and whenever they are updated.
- Attend safeguarding training every two years (as a minimum), which includes charity trustee safeguarding responsibilities.

8.3 The lead trustee for safeguarding prepares an annual safeguarding report and this includes details of any additional training that trustees have attended, either as part of their role as trustees or in other paid or unpaid roles.

8.4 Commissioned services are expected to attend safeguarding training appropriate to their role and are required to provide trustees with confirmation and/or evidence that this training has taken place.

8.5 It is expected that the training undertaken by everyone working on behalf of the charity includes information on specific child safeguarding issues, including (but not limited to):

- physical abuse, emotional abuse, sexual abuse or neglect
- sexual harassment, abuse and exploitation
- criminal exploitation
- online abuse
- modern day slavery
- peer on peer (child on child) abuse (including bullying)
- extremism and radicalisation
- forced marriage
- human trafficking
- female genital mutilation

8.6 Training requirements will be reviewed regularly to ensure that NAVSH is meeting their safeguarding responsibilities.

## **9 Checking and Assurance**

9.1 As part of the trustees' responsibility to ensure that the charity is protecting people from harm, they will have clear oversight of how safeguarding is managed within the charity. They will;

- record any risks in a 'risk register' and include details of how these are managed;
- consult stakeholders to make sure they understand how to raise concerns;
- consult stakeholders to obtain feedback on past experiences if necessary;

- work with statutory agencies and partners and provide information as required;
- have oversight over training for everyone working on behalf of NAVSH (whether paid or unpaid) on safeguarding and protecting people from harm;
- record any potential conflicts of interest at any level;
- plan a standing meeting agenda item on safeguarding and protecting people from harm;
- if necessary, review any historical concerns to identify any lessons to be learnt and make sure they were handled appropriately;
- Commission external reviews or inspections as necessary; and
- Regularly review services that are being provided on behalf of the charity to ensure that they meet necessary statutory requirements for safeguarding.

## 10 Reporting procedures

10.1 Although the charity does not work directly with children, we support a wide range of professionals to do so. As such, we have clear procedures for anyone working on behalf of the charity if they should become aware that a child is suffering, or may be at risk of suffering, abuse or neglect.

10.2 Everyone working on behalf of NAVSH must be alert to signs that a child is experiencing, or is at risk of experiencing harm, abuse or neglect.

10.3 In the event that someone working on behalf of the charity has a safeguarding concern about a child or a vulnerable adult, they must report this immediately. The context in which they will become aware of the concern will vary, so reporting mechanisms may differ. The person who has the concern should either;

- report the concern to the appropriate member of staff at the relevant local authority (a designated safeguarding lead or line manager); AND/OR
- report the concern directly to Adult's or Children's Social Care (as applicable) in the relevant local authority; AND
- report all safeguarding concerns relating to children or vulnerable adults to the lead trustee for safeguarding and the Honorary Secretary, to ensure rigorous oversight.

10.4 Anyone who is working on behalf of the charity may need to share information with the police, a relevant local authority or regulators. Information will be shared in line with the Data Protection Act 2018 and the General Data Protection Regulation.

10.5 In the event that a member of the public, member or anyone from a commissioned service has concerns about the conduct of a trustee, or

anyone working on behalf of the charity, this should be reported to the Honorary Secretary immediately. In the event that the concern relates to the Honorary Secretary, a report must be made to the Chair of Trustees.

10.6 Concerns can also be raised directly with the Charity Commission. Details of how to raise concerns can be found on the Charity Commission website<sup>4</sup>.

## **11 Safeguarding Monitoring**

11.1 The Charity is committed to monitoring performance to ensure continuous improvement.

11.2 In order for all trustees to have clear oversight of how safeguarding and protecting people from harm are managed within the charity, they will;

- ensure that safeguarding is a standing item on the agenda for all trust board meetings;
- discuss any reports from commissioned services at trustee meetings to identify common themes, identify risks and gaps and ensure that any issues are promptly addressed; and
- seek feedback from members to determine if services provided are meeting the high standards we have set for safeguarding.

## **12 Serious Incidents**

12.1 NAVSH will report all serious incidents to the Charity Commission. In the event that a serious incident occurs, there will be a prompt, full and frank disclosure to the Commission.

12.2 The trustees are responsible for making this report. In the event that a serious incident occurs, the trustees will nominate one trustee to contact the Charity Commission. In the event of a safeguarding serious incident, this is likely to be the lead trustee for safeguarding or the Honorary Secretary.

12.3 Trustees will report;

- what happened;
- how NAVSH is managing and responding to the incident; and
- whether it has been reported to other organisations.

12.4 In the context of safeguarding, a serious incident may include (but is not limited to);

---

<sup>4</sup> <https://forms.charitycommission.gov.uk/raising-concerns/>

- any serious incidents where a person has been harmed whilst working for, or on behalf of, NAVSH or when attending events or services run by NAVSH.
- incidents of abuse or mistreatment (alleged or actual) of beneficiaries of the charity (adults or children) which have resulted in or risk significant harm to them and someone connected with the charity, for example a trustee, commissioned service or volunteer, was responsible for the abuse or mistreatment (alleged or actual);
- other incidents of abuse or mistreatment (alleged or actual) of people who come into contact with NAVSH through its work, which have resulted in or risk significant harm to them and are connected to NAVSH's activities;
- breaches of procedures or policies at the charity which have put people who come into contact with it through its work at significant risk of harm, including failure to carry out relevant vetting checks which would have identified that a person is disqualified in law from holding their position within the charity;
- any links to terrorism or extremism; and/or
- harm to the NAVSH's work or reputation.

12.5 Trustees regularly reviews risks and these are recorded in the risk register.

12.6 Trustees recognise that they need to be alert to risks associated with:

- sexual harassment, abuse and exploitation
- criminal exploitation
- cyber abuse
- modern day slavery
- negligent treatment
- self-neglect
- physical or emotional abuse
- bullying or harassment
- health and safety
- commercial exploitation
- extremism and radicalisation
- forced marriage
- human trafficking
- female genital mutilation
- discrimination on any of the grounds in the Equality Act 2010
- people targeting the charity
- a charity's culture allowing poor behaviour and poor accountability
- people abusing a position of trust they hold within a charity
- data breaches, including those under General Data Protection Regulations (GDPR)

## 13 Complaints and Whistleblowing

- 13.1 NAVSH operates a culture of safeguarding and any concerns about poor or unsafe practice, or the NAVSH's safeguarding processes, should be reported to the Chair of Trustees and the Honorary Secretary.
- 13.2 The trustees will take all concerns seriously and complaints will be handled in line with guidance from the Charity Commission. Complaints will be accepted from members, members of the public and commissioned services, as well as anyone working on behalf of NAVSH.
- 13.3 In the event that anyone working on behalf of the charity is unable to raise an issue with the trustees, they should refer to the Charity Commission guidance 'Report serious wrongdoing at a charity as a worker or volunteer'<sup>5</sup>.

## 14 Safer Recruitment

- 14.1 Although NAVSH do not work directly with children, our aim to promote the educational outcomes of looked after children, previously looked after children and care leavers means that we are committed to only recruiting people who are safe and suitable.
- 14.2 We have a separate 'Safer Recruitment Policy' that provides more detail on our recruitment practices.
- 14.3 Trustees undergo all relevant checks prior to taking up the role.
- 14.4 In the event that any commissioned services working on behalf of the charity will work directly with children, they will undergo rigorous quality assurance and induction processes. For further details on safer recruitment practices, please see NAVSH's Safer Recruitment Policy.

## 15 Allegations against adults working in connection with NAVSH

### 15.1 Standards

- 15.1.1 All of those working on behalf of NAVSH, whether paid or unpaid must;
- Adhere to the safeguarding policy, the code of conduct (detailed in the constitution) and the safeguarding behaviour code at all times;
  - avoid any act that may bring the Association into disrepute or diminish the trust and confidence of the public and to abide by the seven principles of public life (see Appendix B);

---

<sup>5</sup> <https://www.gov.uk/guidance/report-serious-wrongdoing-at-a-charity-as-a-worker-or-volunteer>

- maintain the highest possible ethical, personal and professional standards in carrying out their professional responsibilities and in the exercise of Membership of the Association;
- be mindful of their professional standing and of their obligations to users, carers, society, employers, each other, and to other professionals;
- not impose their personal, religious or political beliefs on any person with whom they are in a professional relationship or to suggest that refusal or acceptance of such beliefs may lead to different or preferential treatment;
- uphold relevant legal requirements in the promotion and maintenance of non-discrimination. Fairness and impartiality must be applied in all activities on behalf of the Association;
- ensure they are competent to meet the needs of people turning to them for professional help; and
- take appropriate steps to ensure their continuing professional education and to hold themselves responsible for the standard of professional service or advice that they give.

15.2 NAVSH takes all safeguarding concerns or allegations of abuse against those working on behalf of the charity seriously. We recognise that people may abuse a position of trust they hold within a charity and trustees are committed to creating a culture of safeguarding and minimising opportunity for harm or abuse.

15.3 Allegations or concerns relating to children may include instances where someone working on behalf of the charity has:

- behaved in a way that has harmed a child, or may have harmed a child (either directly or indirectly);
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children<sup>6</sup>.

15.4 Allegations or concerns against those working on behalf of the NAVSH relating to other adults may include (but are not limited to) the following:

- non-disclosure of information required under the Code of Conduct;
- alleged or apparent failure to maintain standards or professional conduct;
- alleged breaches of the code or misuse of Association resources;

---

<sup>6</sup> Working Together to Safeguard Children (2018)

- suspension of a serving Director by their employer for matters of conduct;
- allegations of sexual harassment, abuse, violence or assault;
- misconduct of any kind;
- discrimination against someone in relation to a protected characteristic (Equality Act 2010);
- exploitation of members, beneficiaries or those making charitable contributions to NAVSH; and/or
- such other actions considered to have brought or risk bringing the association into disrepute.

15.5 Any allegations or safeguarding concerns relating to trustees should be reported to the Honorary Secretary. In the event that the concerns are about the Honorary Secretary, the report should be made to the lead trustee for safeguarding.

15.6 Any allegations or safeguarding concerns relating to commissioned services delivering on behalf of the Charity should be reported in line with the organisation's own allegations and whistleblowing policies, and allegations or concerns should then be reported to the Honorary Secretary. If the person is an individual (i.e. not working for another company, charity or organisation) any concerns or allegations should be reported directly to the Honorary Secretary.

15.7 Members of the Association who have reasonable grounds for believing they cannot comply with or find themselves in conflict with any aspect of this Code of Practice or the Association's Constitution should seek advice from one of the Association's Officers.

15.8 In the event of an allegation or serious safeguarding concern against someone working for or on behalf of NAVSH, we will;

- follow the process detailed in the NAVSH Constitution;
- handle and record the concern in a secure and responsible way;
- act quickly, ensuring that we stop or minimise any further harm or damage;
- report it to all relevant agencies and regulators in full, including the relevant<sup>7</sup> Local Authority Designated Officer/s;
- be open and transparent with relevant agencies; and
- review what happened to understand how to stop it from happening again.

---

<sup>7</sup> The Designated Officer/s for the Local Authority in which the individual works.

15.9 Any incidents or concerns involving criminal behaviour will be reported to the police.

15.10 If necessary, NAVSH may also make a referral to the Disclosure and Barring Service.

## **16 Safeguarding Record Keeping**

16.1 All records are managed in line with the Data Protection Act (2018) and the General Data Protection Regulation.

16.2 NAVSH may need to keep records of safeguarding concerns raised by trustees or those working on behalf of the charity. In the event that information about individuals is stored by NAVSH, it will be held securely and retained for the period of time that it is necessary to do so.

## **17 Policy Review**

17.1 This policy will be reviewed as necessary, always following a serious incident and at least once a year. This is to ensure that the policy is effective and fit for purpose.

17.2 This will be carried out by the Honorary Secretary and the Board of Trustees

17.3 A record of changes will be kept securely by the NAVSH administrator.

17.4 All trustees and those working on behalf of the Charity will be made aware of any changes to this policy.

## Appendix A: Useful Contact Details

### National Association of Virtual School Heads

Registered charity number: 1166708

Contact details:

Email address: [info@navsh.org.uk](mailto:info@navsh.org.uk)

### Trustees

Name of Trustee	Role	Contact Details
Patrick Ward	Chair of Trustees	patrick.ward@lewisham.gov.uk
Julie Bunn	Deputy Chair	Julie.Bunn@northyorks.gov.uk
Michelle Salter	Honorary Secretary	Michelle.Salter@telford.gov.uk
Jancis Andrew	Former Chair	Jancis.Andrew@leeds.gov.uk
Lynsey Burridge	Treasurer	lynsey.burridge@trafford.gov.uk
Calvin Kipling	Communications Lead	calvin.kipling@darlington.gov.uk
Matthew Cooke	Lead Regional Rep	matthew.cooke@suffolk.gov.uk
Anwen Foy	CPD Lead	Anwen.Foy@surreycc.gov.uk
Rachael Prior	Research Lead	head.virtualhope@bristol.gov.uk

## Appendix B: The Seven Principles of Public Life (Nolan)

## **1. Selflessness**

Holders of public office should act solely in terms of the public interest.

## **2. Integrity**

Holders of public office must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.

## **3. Objectivity**

Holders of public office must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.

## **4. Accountability**

Holders of public office are accountable to the public for their decisions and actions and must submit themselves to the scrutiny necessary to ensure this.

## **5. Openness**

Holders of public office should act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.

## **6. Honesty**

Holders of public office should be truthful.

## **7. Leadership**

Holders of public office should exhibit these principles in their own behaviour. They should actively promote and robustly support the principles and be willing to challenge poor behaviour wherever it occurs.