StudyGroup

Safeguarding Policy (Including Child Protection)

Online Delivery

September 2024

Student Experience Directorate

For Policies, use the following:

Document Control

Version	Date	Update by	Details
1.0	05.09.22	Sandy Connors	Policy created to ensure safeguarding of students studying exclusively online within their home countries
1.1	28.12.22	Sandy Connors	Updated to reflect new leadership structures
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Document Reviewers

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Elena Rodriguez-Falcon	Executive Director - Academic and UK & Ireland Operations	Accountable
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Associated Documents

Policy
Global Staff Code of Conduct Safer Recruitment Policy Use of Technology Policy Whistleblowing Policy GDLH Online Attendance Policy External Speakers (including Freedom of Speech) Policy Data Protection Policy Criminal Convictions Policy Fitness to Study – Online delivery

Legislation and Government Guidance
Guide to the General Data Protection Regulation, 2018 Prevent Duty: HE Counter Terrorism and Security Act, 2015 Equality Act, 2010

Approved

Proprietor	Signature and date
Sir Keith Burnett Chair of Study Group Ltd	*Keith Burnett* 19th August 2024

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1. Introduction

This policy and its associated procedures describe the safeguarding principles in place to support the welfare of students studying online courses exclusively within their home countries.

Study Group is aware that students could be classified as a child within their home countries and as such this policy also includes expectations of behaviour, which are designed, where possible, to protect children. It should be noted however that these protections are limited by the legal frameworks within individual countries and by the limitations placed on Study Group to act locally.

This policy applies to all permanent, contracted, agency and volunteer staff working those who work remotely for the Global Digital Learning Hub (GDLH) and any associated staff who may have direct or regular contact with students in the course of carrying out their daily duties.

2. Policy and Aims

It is recognised that students are studying online within their home countries and therefore they have the support of their families, their social networks and their local communities. However, on occasion they may struggle, and this may give rise to specific needs. This safeguarding policy aims to ensure that:

- All students are safe;
- All staff and students can recognise welfare issues and signs of abuse;
- All staff act according to the best interests of the students;
- All concerns are escalated to an appropriate member of staff in a timely manner;
- Safeguarding is integrated into the leadership and management of the online delivery team.

3. Safeguarding Principles

Study Group recognises that any student, regardless of age, could be potentially vulnerable and as such the following principles underpin all safeguarding practice:

- Safeguarding is everyone's responsibility;
- All staff understand that abuse can happen in any form;
- There is a Designated Safeguarding Lead (DSL) who has overall responsibility for safeguarding;
- All staff and students are vigilant of possible safeguarding issues and risks of harm;
- All staff and students have effective and various means to raise concerns;
- All students know who to turn to for help, advice or support;
- All students feel safe and secure and protected from harm whilst studying online;
- Staff are aware of and actively use the *Safeguarding Policy*;
- If relevant, staff are made aware of the learning differences, health (including mental health) and disabilities or vulnerabilities of individual students;
- Trends in welfare and safeguarding are identified and acted upon.

4. Safeguarding Roles and Responsibilities

All staff members including permanent, temporary, agency, contractors and volunteers are responsible for safeguarding.

All staff members are prohibited from having intimate personal relationships with any student of Study Group. The prohibition applies to sexual activity and romantic or emotional intimacy.

4.1. Designated Safeguarding Lead

The DSL trained in higher level safeguarding, which is repeated every 2 years. This role is responsible for ensuring that all safeguarding measures are in place and responds in the event of a safeguarding incident occurring.

Please refer to Appendix 1 for contact details of the DSL.

4.2. Welfare Team

The Welfare team are responsible for ensuring:

- All students have sufficient and appropriate means to report concerns, issues, and incidents;
- Online delivery staff have access to and understand the procedures outlined in this policy and those that directly support it;
- Online delivery staff complete safeguarding awareness training and those in the UK complete Prevent Duty training;
- Advice and support are available to staff on issues relating to welfare;
- Individual welfare or safeguarding risk assessments are completed and followed;
- A complete and up-to-date record of all safeguarding related issues and activities is maintained and available to review on request;
- Where appropriate, students receive appropriate individual support and advice, including those with health conditions (physical, emotional and/or mental health) and/or care plans;
- Safeguarding concerns relating to a member of staff who meet the threshold of harm are reported to the Head of Digital Learning Delivery;
- Students are assisted to find suitable welfare support and advice available to them in their home countries;
- Referrals related to possible radicalisation or extremism are discussed with the Director of Compliance – UK as the Study Group Prevent Lead;
- The Head of Digital Learning Delivery (HDLD) is helped to complete the Annual Safeguarding Review (ASR);
- Information is only shared with parents, agents or sponsors as is deemed appropriate on a case-by-case basis;
- Significant incidents are dealt with using the incident management procedure.

Please refer to Appendix 1 for contact details of the Welfare team.

4.3. Head of Digital Learning Delivery (HDLD)

Overall accountability for the safeguarding and welfare of students lies with the HDLD. They are accountable for ensuring:

- All staff are aware of which staff have been allocated the roles of the DSL and DDSL;

- The online service has a comprehensive Centre safeguarding risk assessment in place that is reviewed at least annually;
- All staff are recruited safely in line with the *Safer Recruitment Policy;*
- All safer recruitment checks are recorded within a Single Central Record (SCR);
- Signing off the Annual Safeguarding Review;
- The safeguarding escalation procedure is followed with significant incidents being dealt with using the incident management procedure;
- All staff receive safeguarding awareness within their initial induction period and every three years thereafter;
- All staff have due regard to the need to prevent people being drawn into terrorism and apply this in a sensitive and proportionate way to maintain open free speech and academic freedom;
- A safeguarding training log is maintained and available to view on request;
- Systems are available to log welfare and safeguarding concerns and subsequent actions.

4.4. All staff

All staff delivering online are expected to maintain the same levels of safeguarding understanding and knowledge as other staff within Study Group. In addition:

- They undertake safeguarding awareness training within their induction period and every 3 years thereafter;
- Participate in the annual safeguarding refresher training;
- They undertake Prevent Duty training appropriate to their roles if based in the UK;
- They read and understand the *Safeguarding Policy* and the associated policies and procedures;
- They are aware of who to raise concerns to and by what means;
- They always act professionally and in line with the *Global Code of Conduct.*

5. Raising Concerns
5.1. Enabling students to raise concerns

All students must be made aware of the means available to them to raise concerns, either about themselves or other students.

These reporting systems must be well promoted, easily understood and accessible to encourage students to have the confidence to disclose and know that they will be listened to and supported throughout.

Please refer to Appendix 1 for contact details for raising a concern.

5.2. Concerns about a student

All staff members are made aware of how to raise concerns about students using a variety of means i.e. via electronic tracking system or verbally. All welfare concerns must be raised in a timely manner, and no later than the end of the same working day.

All safeguarding must be reported, either face-to-face or via telephone, to the DSL immediately. All referrals must be followed up in writing via email as per the instructions of the DSL.

Please refer to Appendix 1 for contact details of the DSL.

5.3. Allegations about a member of staff (including contractors, supply and agency staff)

If a concern is identified about the behaviour of a staff member which has or may put a student at risk, this must be reported immediately to the HDLD or, in their absence, the HR Business Partner. The HDLD or designate in their absence must seek advice from the Student Experience Director (or Central Student Wellbeing Team if unavailable) on whether the allegation is likely to meet the threshold of harm.

Allegations against any member of staff, whether employed or a former employee (including claims of historical abuse) will be investigated and managed in line with Study Group policies and procedures. The *Staff Disciplinary Policy* will be followed where the student is over the age of 18 or in the case of a student under the age of 18 where the threshold of harm is not met.

5.4. Allegations about the Head of Digital Learning Delivery or Study Group senior staff

In the event of a concern about the HDLD, or any member of Study Group senior personnel is identified, this must be reported to **Elena Rodriguez-Falcon, Executive Director – Academic and UK & Ireland Operations** as soon as possible.

5.5. Whistleblowing

Staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the safeguarding regime.

Please refer to the *Study Group Global Whistleblowing Policy* for further details.

6. Investigations

All allegations must be investigated in line with Study Group policy.

Advice and guidance relating to investigations can be sought from the *Senior HR Business Partner*.

6.1. Supporting students during investigations

Students will be supported by a welfare officer during all investigations. This includes those that reported the concern, those about whom a concern was raised and those against whom an allegation has been made.

The decision to contact parents and/or agents will be made on a case-by-case basis dependent on the disclosure, the safeguarding risk to the student and the student's wishes. Refer to the *Information Sharing Principles*.

The Associate Director Student Wellbeing may be contacted for advice.

6.2. Supporting staff during investigations

Where an allegation has been made about a staff member, Study Group's responsibility is to ensure the safety of students, however all staff involved will be supported including the person who raised the concern, any witnesses and the person subject to the allegation.

Please contact the HR Business Partner for further advice and guidance relating to supporting staff during investigations.

6.3. Referrals to the Disclosure and Barring Service (DBS) and Teaching Regulation Agency (TRA)

A referral to the DBS will be made if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned. This is the responsibility of the HR team. This is a legal duty and failure to refer when the criteria are met is a criminal offence. In the case of a member of teaching staff the matter may be referred to the TRA to consider prohibiting the individual from teaching (or the country equivalent if applicable for a staff member based outside of the UK).

Please refer to the *Study Group Safer Recruitment Policy* for more information.

7. Welfare Issues

All staff should be aware of the potential for welfare issues and abuse during safeguarding awareness training however they should also refer to https://www.nspcc.org.uk/preventing-abuse/signs-symptoms-effects/ for further information.

The definitions of abuse and an *Indicators of Abuse and Neglect* are available in *Appendix 2.*

7.1. Bullying

Study Group has a zero-tolerance policy on bullying, including online, and as such staff and students must be vigilant. Information about bullying is included within the safeguarding awareness training for staff and within the induction for students.

Any concerns about bullying, including prejudice based and discriminatory bullying, must be raised to the Welfare Team.

The student who is being bullied will be supported by staff responsible for student welfare. As bullying behaviours are also indicative of abuse, the student accused of bullying will also be supported by the welfare team and/or another appropriate member of staff. Incidents of bullying will be dealt with in line with the *Student Disciplinary Policy*.

7.2. Student attendance

Attendance is recorded for all students. Please refer to the *GDLH Online Attendance Policy* for further information.

In the event poor attendance results in a safeguarding concern, and if deemed appropriate, then this will result in increased monitoring of the student's safety and whereabouts.

7.3. Online safety

Use of the internet is essential for teaching and learning for all online courses, and it is also understood that students use the internet widely both inside and outside the learning environment. Whilst provisions are made within the Virtual Learning Environments to protect student safety (such as internet filters) it should be reinforced to students that they are ultimately responsible for their own safety and security when using the internet.

As part of the student induction and tutorial activity throughout the year students are taught about the safe use of the internet (including the dangers associated with the dark web), the appropriate use of social media and how to safely publish content online. They are also made aware of the importance of reporting online abuse internally and externally, including for example the sharing of 'nudes'/sexual imagery.

Staff members should refer to the *Use of Technology Policy* and the *Global Staff Code of Conduct* for further information regarding the use of the internet whilst in an educational setting. It must be noted that the sharing of personal contact details in any form with students may result in disciplinary action. This includes sharing personal details via the VLE's.

Staff must not take photos of students unless they are informed, there is active written permission or it is part of their job to do so. Likewise, any photos taken must not be used on social media unless there is written agreement from the student and permission from the Study Group Creative Services team.

Under no circumstances should personal devices be used to take images or videos of students, and only equipment provided by Study Group must be used. Please refer to the *Global Code of Conduct* for further information.

7.4. Peer-on-peer abuse

This includes child-on-child abuse.

Study Group understands that students can abuse online and with social media and that this represents a safeguarding concern. Study Group adopts a zero-tolerance approach to sexual violence, sexual harassment, bullying, intimate partner abuse and upskirting.

Staff members are advised about the types and indicators of peer-on-peer abuse within the safeguarding awareness training. Any concerns should be raised with the DSL immediately.

All incidents of peer-on-peer abuse will be addressed under the *Student Disciplinary Policy*. Both the victim and the perpetrator will be supported by the welfare team during investigation.

7.5. Harassment and sexual misconduct

All Study Group students must be protected from harassment and sexual misconduct from other students, staff and external speakers and as such there is zero tolerance of any form of harassment, inappropriate sexualised behaviour or sexual misconduct. This includes those instances that occur online.

Staff members should refer to the *Global Code of Conduct* for further information.

All incidents of harassment and sexual misconduct will be addressed under the *Student Disciplinary Policy*.

7.6. Substance misuse

Study Group operate a zero-tolerance policy on the use or misuse of illegal substances by any student, and any incident where a student has been found to be using or under the influence of an illegal substance whilst attending classes online will be subject to disciplinary action.

In the event a student expresses a concern regarding drugs or alcohol, then support and advice is available via the welfare team.

7.7. Abuse and/or violence

Study Group condemns abuse and/or violence in any form, including the coercion behaviours that lead to abuse and/or violence. These include:

- Domestic abuse and/or violence;
- Honour-based abuse and/or violence;
- Forced marriage;
- Female Genital Mutilation (FGM).

Any student concerned about abuse and/or violence including those that witness, are subject to or are worried that they are at risk should raise this with the welfare team who will be able to offer advice and guidance.

8. Radicalisation and/or Extremism (Prevent Duty)

The following applies to all students regardless of age or mode of course delivery.

The Prevent Lead for Study Group is the Director of Compliance – UK.

Study Group recognises that Digital Delivery staff can make a positive contribution towards protecting students from radicalisation or violent extremism. To minimise the risk of this eventuality, Study Group promotes:

- Mutual respect and tolerance of those with different cultures, faiths and beliefs;
- Respect and acceptance of the protected characteristics of others;
- Understanding of the importance of identifying and combatting discrimination;
- Global community values.

All Digital Learning staff based in the UK should complete *Prevent Duty* Training during initial induction and refresh this every 3 years.

If concerns are raised about a student who is exhibiting changes of behaviour and language that could indicate radicalisation or potentially lead to extremism, this must be reported to the DSL immediately.

In the event a concern is raised about a staff member then this should be raised to the HDLD or Senior HR Business Partner in their absence.

8.1. Use of technology

Please refer to the *Use of Technology Policy* for further information on the appropriate use of Study Group technologies and internet access.

8.2. External speakers and freedom to debate

The Digital Learning Team must have regard to the importance of lawful free speech.

The Digital Learning Team should have due regard to the new to prevent people being drawn into terrorism in compliance with the *Counter Terrorism and Security Act 2015* (UK).

- The DSL receives Prevent Referral training, as appropriate;
- All staff are aware of radicalisation;
- Risks relating to events, activities and learning initiatives are identified;
- Reasonable steps are taken to research potential online external speakers to ensure that they do not incite hatred, violence or call for the breaking of the law or are linked to organisations' advocating extremism.

Please refer to the *External Speakers Policy (including Freedom of Speech)* for further information.

9. Students with Health Conditions (Physical, Emotional, or Mental) or Learning Differences

This includes students with a disability.

Although it is understood that students have the right not to disclose specific health conditions (physical, emotional or mental) and/or disability or learning differences, failing to do so will render it difficult for Study Group to adjust online learning to assist individual students to achieve a positive outcome.

In the event information is disclosed, this will only be shared on a need-to-know basis with key support staff, and only after a student has provided permission to do so. All students who disclose a learning, health or disability need will receive advice and guidance via the welfare team as advice and guidance can be provided.

If any health condition (physical, emotional, or mental) results in poor attendance or a reduced capacity to learn, then Study Group reserves the right to defer the student's course as set out in the *Fitness to Study Policy*.

10. Record Keeping
10.1. Concerns about students

All concerns should be logged in C-POMS. It is important that notes only record the facts as presented by the student. Notes on the discussions, decisions made and the reasons for the decision should also be recorded in writing. This information should be kept confidential and stored securely in local welfare files. It should contain:

- a clear, accurate and comprehensive summary of the concern;
- details of how it was followed up and resolved;

- a note of the action taken, decisions reached and the outcome.

The DSL should ensure all personal information is processed fairly and lawfully and kept safe and secure in line with the *Data Protection Act 2018* & *UK GDPR*. Note this does not prevent the sharing of information for the purposes of safeguarding children or an adult at risk when it is necessary, proportionate, and justified to do. See the *Information Sharing Principles*.

10.2. Allegations against a member of staff

i.   Do not meet the threshold of harm

All concerns should be recorded in writing and include details of the concern, the context it arose, any action taken and the name of the person sharing their concern.

These records must be kept confidential, held securely and comply with the *Data Protection Act 2018* and UK GDPR. The information may only be shared with the HDLD and HR advisor. The information should be kept until the person leaves their employment with the Centre.

ii.   Meet the threshold of harm:

Where an allegation is found to be false or malicious it should be removed from the person's records. Where the allegation is substantiated, unfounded or unsubstantiated the following must be kept on file for a period of 10 years:

- Clear and comprehensive summary of the allegation;
- Details of how it was followed up and resolved;
- A note of action taken, decisions reached and the outcome;
- A copy provided to the person concerned and a declaration on whether the information will be referred to in any future reference.

11. Equality and Inclusion

Study Group has a diverse community of students (and staff) who are expected to be tolerant of each other. Study Group gives due regard to the *Equality Act 2010* and as such all members of the Study Group community (students and staff) are expected to take a role in promoting equality and embracing diversity.

Study Group embraces and celebrates the diversity of religions and denominations among its students; and practical provision for students to observe their religion can be made during their stay however this must not compromise the educational aims or an individual student's ability to learn and develop. Failure to respect student peers or staff will result in disciplinary action.

Appendix 1: Contact Information

For general welfare queries: welfaredigital@studygroup.com.

Name	Position	Role	Telephone Number	Email
Giovanna Lagana	Digital Welfare Support Officer	Welfare Officer	+44 1273 944677	glagana@studygroup.com
Ruta Simonyte	Head of Digital Student Experience and Operations	Designated Safeguarding Lead		ruta.simonyte@studygroup.com
Rebecca Mason	Head of Digital Learning Delivery	Head of Digital Learning Delivery		rebecca.mason@studygroup.com
Peter Skillen	Director Compliance - UK	Study Group Prevent Lead	+441273944531	pskillen@studygroup.com
Olly Walker	Associate Director Student Wellbeing	Advice on managing welfare cases	01273 005102	owalker@studygroup.com

Appendix 2: Indicators of Abuse and Neglect

Taken from the *NSPCC Definitions and signs of child abuse – guidance for professionals who work with children on how to recognize the signs of child abuse.*

Training is provided to all GDLH staff to help them identify abuse whilst working exclusively online.

The physical signs of abuse may include:

- Multiple injuries (such as bruising, fractures) inflicted at different times
- Unexplained bruising, marks or injuries on any part of the body
- Multiple bruises - in clusters, often on the upper arm, outer thigh
- Any burns that have a clear shape of an object e.g. cigarette burns
- Large oval shaped bite marks
- Broken bones
- Scalds, with upward splash marks, multiple burns with a clearly demarcated edge
- Cuts

Changes in behaviour that can also indicate physical abuse:

- Fear of parents being approached for an explanation
- Aggressive behaviour or severe temper outbursts
- Flinching when approached or touched
- Reluctance to get changed, for example in hot weather
- Depressive, anxiety and eating disorders
- Suicidal thoughts and feelings
- Withdrawn behaviour
- Running away from home
- Risk taking behaviour

Changes in behaviour which can indicate emotional abuse include:

- Neurotic behaviour e.g. sulking, hair twisting, rocking
- Being unable to play
- Fear of making mistakes
- Sudden speech disorders, or use of language in a way not expected for age
- Self-harm
- Fear of parent being approached regarding their behaviour
- Struggle to control strong emotions or have extreme outbursts
- Seem isolated from parents

The physical signs of sexual abuse may include:

- Anal or vaginal soreness or itching
- Bruising or bleeding near genital area
- Sexually transmitted infections (STI)
- Vaginal discharge or infection
- Stomach pains
- Discomfort when walking or sitting down
- Pregnancy

Changes in behaviour which can also indicate sexual abuse include:

- Sudden or unexplained changes in behaviour e.g. becoming aggressive or withdrawn
- Avoiding spending time with specific people
- Having nightmares
- Running away from home
- Sexual knowledge which is beyond their age, or developmental level
- Sexual drawings or language
- Bedwetting
- Eating problems such as overeating or anorexia
- Self-harm or mutilation, sometimes leading to suicide attempts
- Saying they have secrets they cannot tell anyone about
- Risky behaviour such as substance misuse, offending and risky sexual behaviour
- Suddenly having unexplained sources of money
- Not allowed to have friends (particularly in adolescence)
- Acting in a sexually explicit way towards adults

The physical signs of neglect may include:

- Constant hunger, sometimes stealing food from other children
- Constantly dirty or 'smelly'
- Loss of weight, or being constantly underweight
- Inadequate clothing for the weather conditions
- Untreated injuries, health or dental problems

Changes in behaviour which can also indicate neglect may include:

- Complaining of being tired all the time
- Not requesting medical assistance and/or failing to attend appointments
- Having few friends
- Mentioning being left alone or unsupervised.
- Poor diet leading to obesity or malnourishment

Further information is available from:
https://www.nspcc.org.uk/preventing-abuse/signs-symptoms-effects/

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