



THE **NATIONAL**
SOCIETY
for Education, Mentoring and Media

Safeguarding Policy

Document Information

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www.nsemm.org.uk

Introduction

The National Society for Education, Mentoring and Media (NSEMM) is committed to safeguarding the welfare of all at-risk children, young people, and adults who participate in our tutoring and mentoring programs. This policy outlines the robust procedures we have in place to promote a safe environment, identify and respond to potential harm, and ensure the well-being of those we serve.

Legislation and Guidance

Our safeguarding policy is firmly grounded in relevant legislation and guidance to ensure we adhere to best practices. This policy is drawn upon the following:

- Children Act 1989 (and 2004 amendment)
- Children (Scotland) Act 1995
- The Care Act 2014
- Human Rights Act 1998
- Working Together to Safeguard Children 2018
- National Guidance for Child Protection in Scotland 2021
- Keeping Children Safe in Education 2023

By adhering to this legislation and guidance, we aim to create a safe and secure environment for all at-risk children, young people, and adults who interact with NSEMM staff, volunteers, and programs.

Core Guidance

At NSEMM, we believe that safeguarding is everyone's responsibility. We are committed to fostering a culture of openness, transparency, and trust where everyone feels comfortable reporting concerns and speaking up if they see something unsafe or feel unsafe.

Here are some ways we will promote a culture of safeguarding:

- We will provide regular safeguarding training for all staff and volunteers.
- We will hold regular discussions about safeguarding during team meetings.
- We will encourage open communication and a listening environment where individuals feel safe to raise concerns.
- We will involve children and young people in safeguarding discussions, where appropriate, and listen to their voices.
- We will give access to safeguarding posters, training and resources through our intranet and our online learning resource centres.

Working together can create a safe and supportive environment for all children, young people, and adults who interact with NSEMM.

At NSEMM, safeguarding is underpinned by core principles that guide our interactions and inform our decision-making processes. These principles are:

- The welfare of the child is paramount. This means that the safety and well-being of children and young people are our top priority in all situations.
- We listen to and respect children, young people, and adults at risk. We create an environment where individuals feel safe to disclose concerns and are treated with respect and empathy.
- We partner with children, young people, parents/guardians, and other agencies. We believe collaboration is critical to effectively safeguarding children and young people. We involve parents/guardians in the safeguarding process wherever possible and work alongside other agencies, such as social services or the police, when necessary.
- We have robust procedures for managing safeguarding concerns and disclosures, clear and consistent guidelines for reporting problems, managing disclosures of abuse, and taking appropriate action.
- We train staff and volunteers on safeguarding best practices. We equip them with the knowledge and skills they need to identify potential risks, respond to concerns appropriately, and create a safe environment for all.

Safeguarding Arrangements

To deliver on our safeguarding commitments, we have implemented several vital arrangements:

- **Safer Recruitment:** We prioritise children's and young people's safety by conducting thorough DBS checks (England and Wales) or PVG Scheme membership checks (Scotland) for all staff and volunteers who interact with them. This helps mitigate risks and ensure that only suitable individuals work with vulnerable groups.
- **Designated Safeguarding Lead (DSL):** Adrian Angol-Henry (dsl@nsemm.org.uk) is the Designated Safeguarding Lead (DSL) responsible for overseeing safeguarding within NSEMM. The DSL has a wealth of knowledge and experience in safeguarding matters and provides guidance and support to staff and volunteers. A wider Safeguarding Team also supports the DSL, ensuring a dedicated team is in place to address safeguarding concerns.

- **Reporting Concerns:** We have a clear and accessible reporting system that allows anyone to report a concern about a child or young person's safety. This can be done through our safeguarding form to ensure a consistent and documented approach to reporting concerns:
<https://link.nsemm.org.uk/safeguarding-form>
- **Confidentiality and Information Sharing:** We understand the importance of confidentiality while prioritising children's and young people's safety. We have clear procedures for sharing information about safeguarding concerns while respecting confidentiality as much as possible. We only share information with those who need to know and in accordance with data protection legislation.

Our Specific Activity Policies

NSEMM prioritises safeguarding children and young people in our tutoring and mentoring programs. We have established clear procedures that adhere to relevant data protection legislation and safeguarding best practices, ensuring a balance between protecting children and fostering a supportive learning environment.

Tutoring

NSEMM prioritises safeguarding in all interactions. To ensure a safe and secure environment for students and tutors, all tutoring sessions are recorded using audio and video on Microsoft Teams. Tutors must have their cameras on and will not run lessons in public spaces or other areas where non-NSEMM adults or young people are present, without authorisation from the Safeguarding team.

These recordings are retained for a minimum of 180 days unless a more extended retention period is required by law or another applicable NSEMM policy, such as in cases where a student needs additional support or an ongoing investigation.

Recordings are an essential tool for safeguarding children and young people. They provide a record of interactions and can be invaluable in case of a concern or allegation. Recordings can help to:

- **Identify and Investigate Safeguarding Concerns:** If a concern arises about a student's safety or well-being, the recording can be reviewed to identify potential risks and ensure appropriate action is taken.

- **Provide Evidence:** Recordings can serve as evidence in case of a safeguarding allegation. They can help to verify details of the session and identify any inappropriate behaviour.
- **Maintain Quality:** Recordings can also be used for quality assurance purposes. By reviewing recordings, NSEMM can monitor the effectiveness of tutoring sessions, identify areas for improvement in teaching methods, and ensure consistency with our curriculum.

Mentoring

Mentoring sessions foster a safe space for open and honest conversation. Information shared during these sessions will be kept confidential, following the principle of confidentiality outlined in the agreed-upon signed agreement (Appendix A). This agreement, signed by the tutor, student, and parent/guardian, clarifies expectations, reporting procedures, and the limitations of confidentiality.

However, it is essential to understand that the safety of a child or young person takes precedence over confidentiality. If a mentor has any concerns about a student's safety or the safety of others, they are legally obligated to report these concerns. This will be done following the established safeguarding procedures outlined in the Safeguarding Agreement.

- **Detailed Notes:** To track progress, support effective mentoring, and maintain a record of discussions, detailed notes will be taken during and after each session. These notes will focus on factual observations and avoid interpretations to ensure objectivity. The notes will be stored securely within the NSEMM record-keeping system, with access restricted to staff members of the mentoring and safeguarding teams only.
- **Transparency Regarding Recordings:** While mentoring sessions are not recorded, students (and parents/guardians) will be informed at the outset that notes are taken and retained for a specific period (as outlined in NSEMM's data retention policy). They will have the right to request access to these notes, subject to data protection legislation and verification procedures.

NSEMM understands that young people may wish to discuss sensitive topics during mentoring sessions. We are committed to creating a safe space where they feel comfortable sharing openly and honestly, knowing their information will be handled with discretion. However, it is crucial to be transparent about the limitations of confidentiality, particularly regarding safeguarding concerns.

Our mentors are not mental health first aiders; the only person at NSEMM who currently has MHFA-accredited training is Adrian, our DSL. While we plan to change this, it's important to note that our staff members' job is only to signpost to support.

Balancing Privacy and Safeguarding

NSEMM understands the importance of student privacy. We acknowledge that students (or parents/guardians if the student is under the age of consent) may wish to request the deletion of their recordings before the 180-day retention period ends.

Requesting Deletion: Formal requests for deletion must be made in writing to the Designated Safeguarding Lead (DSL) at dsl@nsemm.org.uk. The DSL will consider each request carefully, following data protection legislation and upholding legal requirements and NSEMM policies. This may involve verifying the requesting party's identity and assessing the request's legitimacy.

Special Considerations for Under 18s: Recordings containing content involving individuals under 18 will be deleted immediately upon receipt of a valid written request for deletion unless exceptional circumstances apply. Students (and parents/guardians) will be informed about the recording process, its purpose, and their rights regarding data deletion at the outset of tutoring sessions. However, there are exceptional circumstances where recordings may be retained beyond the standard period or even after a deletion request is received:

- **Ongoing Safeguarding Investigations:** If a session is part of an ongoing investigation into a potential safeguarding concern, the recording may be retained for a longer period to ensure a thorough investigation can be completed. This ensures the safety and well-being of the child or young person involved, which takes precedence over data deletion.
- **Probationary Tutors:** In cases where the tutor involved in the recording is on probation, the recording may be retained for a limited time beyond the standard period. This allows NSEMM to monitor the tutor's performance and adherence to safeguarding and quality assurance practices during their probationary period.

In minimal cases, even after deletion from the central storage system, anonymised copies of recordings may be retained for a restricted period for legitimate legal or regulatory purposes. This is done only per data protection legislation and ensures NSEMM meets its obligations for record-keeping and potential future investigations. These anonymised recordings would not contain

any personally identifiable information. They would only be used for statistical analysis or to identify broader trends in tutoring delivery, not for any individual-level purposes.

NSEMM is committed to transparency and will work with students (and parents/guardians) to address any concerns they may have about the recording process. This approach balances safeguarding children and young people while respecting student privacy.

Safeguarding Disclosures

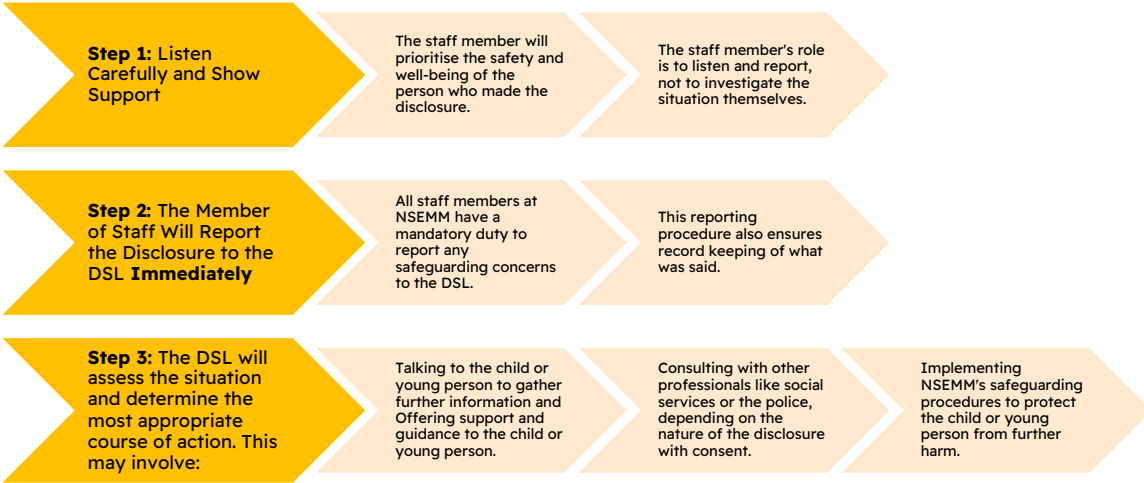
How to Report Disclosures

There are many people you can talk to about any safeguarding concerns you may have:

- Any tutor or mentor or their line manager.
- Any member of NSEMM staff or a volunteer
- Our DSL, Adrian Angol-Henry, is specifically trained to deal with safeguarding concerns and has safeguarding training from the NHS and NSPCC. You can contact them directly at dsl@nsemm.org.uk or by asking a staff member to put you in touch.
- You can also report concerns anonymously through our online safeguarding form: <https://link.nsemm.org.uk/safeguarding-form>

What Will Happen

- We will take all disclosures seriously and investigate them thoroughly.
- We will listen to you without judgment and offer support throughout the process.
- We will only share information with others to keep you safe or investigate the concern further.
- We will always explain what we are doing and why.
- We will keep you informed of the progress of any investigation and the next steps.
- We understand this can be a worrying time for you, and we will do our best to support you.



Managing Allegations Against Staff

NSEMM has clear procedures in place for managing allegations of abuse against a child, young person, or adult at risk. These procedures are aligned with national guidance and ensure a consistent and fair approach to handling such sensitive situations.

Any concerns or allegations of abuse should be reported immediately to the Designated Safeguarding Lead (DSL) or a member of the Safeguarding Team. This can also be reported to a line manager, who will ensure it reaches the DSL. Reports can be made in person, by phone (if you are a staff member) or through the form.

Upon receiving an allegation, the following steps will be taken:

1. **Initial Assessment:** The DSL will assess the seriousness of the allegation and the immediate risk of harm to the child, young person, or adult at risk. This will involve gathering information from the person who made the allegation and any potential witnesses.
2. The DSL will consult with relevant colleagues, such as the Chief Executive Officer and the Local Authority Designated Officer (LADO), particularly if the allegation relates to a member of NSEMM staff or a volunteer who works for another organisation. This consultation will determine the most appropriate course of action, prioritising the child's or young person's safety. This may involve:
 1. **Harm Prevention:** As a top priority, the DSL will take steps to ensure the alleged abuser is not still able to harm the child or young person. This may involve suspending a member of staff/volunteer from duties or taking other measures to create physical separation.
 2. **Internal Investigation:** If the allegation concerns a member of NSEMM staff or a volunteer, an internal investigation will be launched. A trained, independent investigator will conduct this.
 3. **Referral to Statutory Agencies:** If the allegation suggests a crime may have been committed or a child/young person is at risk, the DSL will make a referral to the police or social services. This will be done under national guidelines.
 4. **Support:** NSEMM will support the child, young person, or adult at risk who has made the allegation and their family. This may include access to counselling or other support services. We will also offer

support to any staff or volunteers who are involved in the allegation.

It is important to note that the identity of the person who made the allegation will be kept confidential wherever possible unless this compromises the investigation. The alleged abuser will be informed of the allegation at an appropriate stage, following national guidance on disclosure. Throughout the process, NSEMM will act following data protection legislation.

Online Safety

NSEMM recognises the increasing importance of online safety in our work. We take a comprehensive approach to ensure a safe online environment for all users of our platforms, including staff, volunteers, students, and parents/guardians.

Platform Choice: We prioritise secure platforms for communication and resource sharing. Platforms like Microsoft Teams for tutoring sessions and a password-protected online portal for resources offer built-in security features and allow us to monitor activity for potential risks.

Clear Communication Guidelines: We provide clear and accessible online safety and acceptable use guidelines for all users. These guidelines outline expectations for appropriate online behaviour, including:

- All communication should be professional, respectful, and offensive or discriminatory language should be avoided.
- Access to the NSEMM intranet and resources are granted for professional purposes only. Downloading, using, or sharing resources for personal use is strictly prohibited.
- Information accessed on the Intranet and Resources is considered confidential. Users must not share this information with unauthorised individuals or organisations.
- NSEMM or relevant rights holders copyright all materials on the Intranet and Resources. Users cannot modify or distribute these materials without prior written consent.
- Users are encouraged to report concerns about inappropriate content, security breaches, or suspected misuse of the Online Intranet and Resources to the IT department or the Designated Safeguarding Lead (DSL).

- NSEMM cannot be held responsible for the content or safety of external platforms. Users are encouraged to exercise caution and follow the safety guidelines of their platform.
- NSEMM staff should avoid adding students or colleagues as personal friends on social media as a professional relationship exists.

Additional Considerations for Staff and Volunteers:

In addition to the general online safety guidelines, staff and volunteers who interact with students online (e.g., through tutoring sessions or online mentoring resources) must adhere to the following:

- **Professional Online Presence:** Staff and volunteers should maintain a professional online presence, avoiding sharing personal information or engaging in inappropriate online activity that could reflect poorly on NSEMM. All staff members must have social media accounts on 'private' or 'friends-only'.
- **Boundaries and Privacy:** Staff and volunteers must maintain clear boundaries with students online. This includes avoiding one-on-one communication outside of Google Classroom and Microsoft Teams/Jabber platforms and refraining from personal conversations or sharing personal information.
- **Reporting Concerns:** Staff and volunteers are responsible for reporting any concerns about online safety breaches, cyberbullying, or inappropriate student behaviour to the Designated Safeguarding Lead (DSL) immediately.

Cyberbullying Prevention and Response:

NSEMM is committed to preventing cyberbullying and responding to it in all its forms. We will:

- **Raise Awareness:** We will provide regular training sessions for staff, volunteers, and students on cyberbullying awareness, prevention strategies, and reporting procedures.
- **Support for Victims:** We will offer support and guidance to any student experiencing cyberbullying. This may include connecting them with school counsellors, mental health professionals, or external support organisations.

- **Confronting Cyberbullies:** We will take appropriate disciplinary action against students who engage in cyberbullying, which aligns with NSEMM's policies and procedures.

Working with External Agencies

Data Sharing with The Police

While the Data Protection Act allows us to assist the police in investigations, we are committed to protecting the privacy and safety of the young people we support. We will only share information with external organisations, including the police, under the following circumstances:

- We receive a valid request with a proper legal basis, such as a Schedule 2 Part 1 Para. 2 Data Protection Act 2018 request form signed by a police inspector or officer of a higher rank. This applies to requests from other government bodies as well. In such cases, we will ensure the requesting body has the legal authority to make the request.
- We will always verify the validity of any request by contacting the requesting organisation through a separate channel (e.g., calling their main switchboard) to confirm the request and the requesting person.
- We will only disclose information that is directly relevant to the investigation. Requests for all data or entire files will be scrutinised closely.
- We will ensure transparency by informing parents/guardians (when possible) and checking that our privacy notices cover such information sharing.
- We will confirm a lawful basis for sharing information, especially for "special category" data (e.g., health information) or criminal conviction data. We will also ensure the requesting body provides the appropriate legal condition for sharing such data (vital interests generally don't apply).
- All requests must be made using our form and emailed to dsl@nsemm.org.uk.

We are not obligated to share information unless a valid court order is presented, except when there is an immediate risk to life or limb. We understand that time is crucial in safeguarding situations. While data protection rules still apply, we will strive to balance protecting student privacy and assisting investigations, especially if there is an immediate risk to individuals.

The police may use consent forms from alleged victims of serious assault. These forms will be directed to the safeguarding team to ensure the student understands the information being shared and the purpose for sharing it.

We reserve the right to refuse requests not meeting the above criteria.

Arrests

NSEMM will not release a child under 10 to the police for arrest. If the police request to take a child under ten into custody, we will inform them of the child's age and explore alternative solutions.

In the case of a student aged 11-17, NSEMM will follow its established verification procedure to confirm the legitimacy of the arrest request. This includes:

- Verifying the identity of the requesting officer with the relevant police force.
- Confirming the young person's identity and that they are participating in an NSEMM activity.
- Ensuring the police have a proper legal basis for the arrest, such as a warrant.

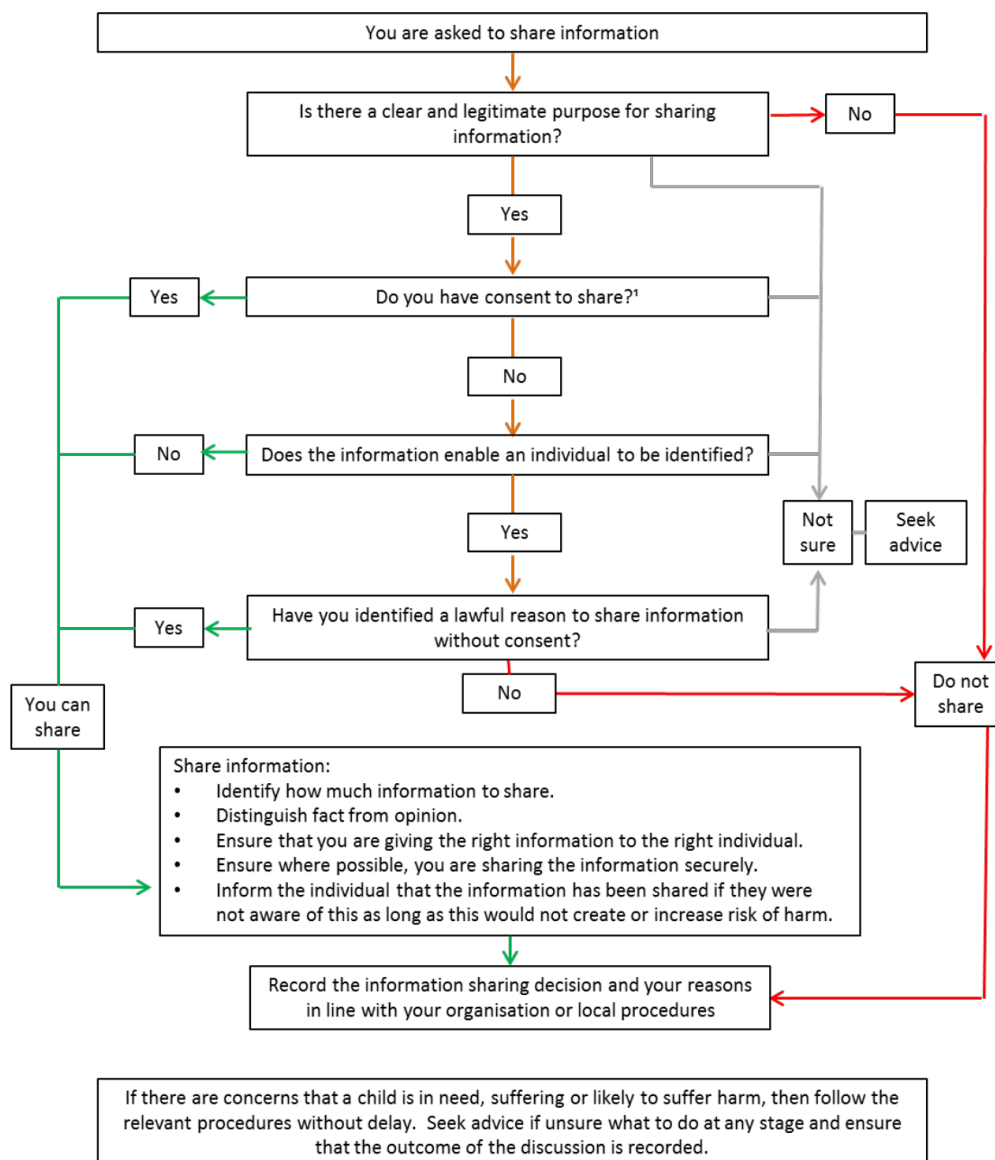
The safety of the young people and those around them will be NSEMM's top priority throughout the process.

NSEMM will attempt to contact the student's parents/guardians and involve them in the process before the arrest occurs unless there are safeguarding concerns (such as the risk of harm to the child from the parents/guardians) that prevent it.

NSEMM will consider the severity of the offence. Serious crimes likely result in full cooperation with the police, while lesser offences might involve alternative solutions, such as mediation within their school, NSEMM or restorative justice processes. If the arrest is for a minor offence, NSEMM will attempt to mediate or explore alternative solutions unless there are safety concerns. Arrests at NSEMM in-person activities should only happen with parental involvement and only when necessary.

Other Information Sharing

If we're asked to share information by any other organisation, we will follow the flowchart below. If advice is needed, the Human Resources team or the Designated Safeguarding Lead shall be responsible for supporting staff members through this information sharing process.



Training

NSEMM is committed to ensuring all staff and volunteers have the knowledge and skills to promote safeguarding and online safety. We provide regular training sessions on a variety of topics, including:

- **Identifying and Reporting Safeguarding Concerns:** This training will cover different types of abuse and neglect, signs and symptoms to look out for, and the reporting procedures to follow within NSEMM. Participants will learn how to identify situations requiring a referral to statutory agencies.
- **Safeguarding Best Practices:** This training will equip staff and volunteers with the knowledge and skills to create a safe and supportive

environment for children and young people. It will cover topics such as maintaining appropriate boundaries, confidentiality, information sharing, and managing disclosures.

- **Recognising and Responding to Cyberbullying:** This training will raise awareness of cyberbullying, its potential impact on victims, and strategies for prevention and intervention. Participants will learn how to identify signs of cyberbullying, how to support victims, and how to report incidents.
- **Responsible Use of Social Media and Online Platforms:** This training will educate staff and volunteers on the safe and responsible use of social media and other online platforms. It will cover topics such as managing online privacy settings, avoiding online scams and identifying inappropriate content.
- **Data Protection and Information Security:** This training will ensure staff and volunteers understand their data protection and information security responsibilities. Participants will learn how to securely handle personal data, minimise breaches, and comply with relevant legislation.

Whistleblowing

NSEMM is committed to creating a safe environment where staff, volunteers, students, and parents/guardians can raise concerns about safeguarding or potential wrongdoing without fear of reprisal. We encourage individuals to speak up if they suspect a child or young person may be at risk, a policy is being breached, or other safeguarding concerns.

Review

This Safeguarding Policy, including the Online Safety and Acceptable Use Policy, will be reviewed regularly to ensure it remains up-to-date and reflects best practices. As part of this review process, we will consider changes in legislation, national guidance, and emerging safeguarding risks. The effectiveness of this document and all our policies have been assessed in line with NSPCC guidance.

This document was last reviewed in **April 2024**, due to be reviewed in **October 2024**.

Contact Us

If you have any questions or concerns about safeguarding or online safety at NSEMM, please do not hesitate to contact:

Designated Safeguarding Lead:

Adrian Angol-Henry (dsl@nsemm.org.uk)

Alternatively, you can use our online reporting form:

<https://link.nsemm.org.uk/safeguarding-form>

We are committed to working together to ensure the safety and well-being of all at-risk children, young people, and adults who participate in NSEMM programs and utilise our online resources.