



## **Safeguarding and Child Protection Policy**

### **The purpose and scope of this policy statement is:**

It is the policy of Virtucate VR Ltd is to ensure that every child or young person who attends our VR learning session should be able to participate in a fun and safe environment and be protected from neglect and physical, sexual and emotional abuse.

The key principles that underwrite this policy are:

- Anyone under the age of 18 years should be considered as a child for the purposes of this document
- The child's and/or young person(s) welfare is paramount
- All children and/or young person(s) whatever their age, culture, ability, gender, language, racial origin, religious belief and/or sexual identity have the right to protection from abuse
- All suspicious allegations of abuse will be taken seriously and responded to swiftly and appropriately
- To ensure that adults working with children and/or young person(s) are also provided protection and are aware of the best practice so they can be protected from wrongful allegations
- Recruitment of all Virtucate VR Ltd staff will follow guidelines, with all staff being subject to DBS checks and on the update service
- To protect children and young people who receive Virtucate VR Ltd.'s services from harm. This includes the children of adults who use our services
- To provide staff and volunteers, as well as children and young people and their families, with the overarching principles that guide our approach to child protection.

This policy applies to anyone working on behalf of Virtucate VR Ltd including senior managers, paid staff, agency staff and students.

## **Legal Framework**

This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect children in England. A summary of the key legislation and guidance is available from [nspcc.org.uk/childprotection](https://www.nspcc.org.uk/childprotection).

### **Supporting Documents**

This policy statement should be read alongside our organisational policies, procedures, guidance, and other related documents:

- Role and description for the designated safeguarding officer
- Dealing with disclosures and concerns about a child or young person
- Managing allegations against staff
- Recording concerns and information sharing
- Child protection records retention and storage
- Code of conduct for staff and volunteers
- Photography and sharing images guidance
- Safer recruitment
- Online safety
- Anti-bullying
- Managing complaints
- Health and safety
- Induction, training, supervision, and support

### **We believe that:**

- Children and young people should never experience abuse of any kind
- Virtucate VR Ltd have a responsibility to promote the welfare of all children and young people, to keep them safe and to practise in a way that protects
- Virtucate VR Ltd has a zero tolerance against abuse and exploitation of vulnerable people. Virtucate VR Ltd also recognises that safeguarding is everyone's responsibility and that it has an obligation to put in place reasonable measures to ensure, as far as possible, the safety and wellbeing of children, vulnerable people, young people and students working or supporting Virtucate VR Ltd.

### **We recognise that:**

- The welfare of children and young people is paramount in all the work we do and in the decisions we take
- Working in partnership with children, young people, their parents, carers, educational establishments and other agencies is essential in promoting young people's welfare
- All children and young people, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation have an equal right to protection from all types of harm or abuse
- Some children and young people are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues
- Extra safeguards may be needed to keep children and young people who are additionally vulnerable safe from abuse.
- When collaborating with local schools, colleges and universities and any other educational or corporate establishment Virtucate VR Ltd will ensure that their safeguarding procedures are consistent and in line with the principles and approaches set out in this policy
- Virtucate VR Ltd recognises that an element of risk exists, and while we may never be able to totally remove this, we need to do all we can to reduce it or limit its impact
- Virtucate VR Ltd respects confidentiality and has a responsibility to protect at all times sensitive personal data in line with General Data Protection Regulation (UK GDPR) legislation. Information should only be shared and handled on a need-to-know basis, that is, access to the information must be necessary for the conduct of one's official duties. Only individuals who have legitimate reasons to access the information are allowed to receive it.

**We will seek to keep children and young people safe by:**

- Valuing, listening to and respecting them
- Appointing a nominated Designated Lead Safeguarding Officer for children and young people and a deputy
- Adopting child protection and safeguarding best practice through our policies, procedures and code of conduct for staff and volunteers
- Providing effective management for staff and volunteers through supervision, support, training and quality assurance measures so that all staff and volunteers know about and follow our policies, procedures and behaviour codes confidently and competently

- Recruiting and selecting staff and volunteers safely, ensuring all necessary checks are made
- Recording and storing and using information professionally and securely, in line with data protection legislation and guidance
- Using our safeguarding and child protection procedures to share concerns and relevant information with agencies, colleges, universities and schools who need to know, and involving children, young people, parents, families, and carers appropriately
- Using our procedures to manage any allegations against staff, students and volunteers appropriately
- Creating and maintaining an anti-bullying environment and ensuring that we have a policy and procedure to help us deal effectively with any bullying that does arise
- Ensuring that we have effective complaints and whistleblowing measures in place
- Ensuring that we provide a safe physical environment for our children, young people, staff and volunteers, by applying health and safety measures in accordance with the law and regulatory guidance
- Building a safeguarding culture where staff, students and volunteers, children, young people and their families. Treat each other with respect and are comfortable about sharing concerns.

### **Designated Safeguarding Officers**

Designated safeguarding officers are responsible for handling reports or concerns, about the protection of vulnerable people, appropriately and in accordance with the procedures that underpin this policy set out by Virtucate VR Ltd.

The lead designated safeguarding officer is responsible for:

- Monitoring and recording safeguarding concerns
- Ensuring referrals to the relevant authorities happen without delay
- Updating safeguarding training for all staff
- Ensuring this policy is to be reviewed every 3 years or earlier if necessary
- Ensuring it is implemented throughout Virtucate VR Ltd employees, volunteers and other and safeguarding training given
- Ensuring monitoring and recording procedures are implemented

- Ensuring those that work (full time, part time or seasonal), volunteer, students that undertake work experience with Virtucate VR Ltd or on a placement with us: Read, Understand and adhere to the Virtucate VR Ltd Safeguarding Policy and Virtucate VR Ltd code of conduct policy

**Contact Details:**

**Designated Safeguarding Lead Officer**

Name: Mr Luke Fey

Phone: 07788235128

Email: [contact@virtucatevr.co.uk](mailto:contact@virtucatevr.co.uk)

**Deputy Safeguarding Officer**

Name: Mr Jason Fey

Phone: 07788235128

Email: [contact@virtucatevr.co.uk](mailto:contact@virtucatevr.co.uk)

**Deputy Safeguarding Officer**

Name: Mrs Paula Fey

Phone: 07788235128

Email: [contact@virtucatevr.co.uk](mailto:contact@virtucatevr.co.uk)

Virtucate VR Ltd

Phone: 07788235128

Contact for advice or child protection support:

**NSPCC Helpline 0800 800 500**

**and/or Childline 0800 1111**

**Virtucate VR Ltd Managerial Staff**

The Virtucate VR Ltd managerial staff are responsible for ensuring the effective implementation of this policy and associated procedures and ensuring that everyone linked with Virtucate VR Ltd is equipped and supported to meet their responsibilities.

**What is Abuse?**

Child abuse is a term used to describe ways in which children or young people are harmed, usually by adults and increasingly by peers. Often these people are people they know and trust. It refers to the damage done to a child's or young person's physical, mental or emotional health. Children or young people can be abused within or outside their family, at school and within a public environment.

There are four main types of child abuse, though a child and/or young person may experience more than one kind at any one time in his/her life.

**Physical abuse includes situations where someone:**

- Physically hurts or injures children or young people
- Gives children or young people alcohol

**Neglect includes situations in which:**

- A child or young person's basic needs are not met
- Children or young people are consistently left alone and unsupervised
- Neglect might also occur if a staff member fails to ensure children or young people are safe, or exposes them to not age-related VR content

**Sexual abuse includes situations in which adults/peers use children or young people to meet their own sexual needs through:**

- Full sexual intercourse, masturbation, oral sex, anal sex or fondling
- Showing pornographic photographs or videos or taking photographs for pornographic purposes
  - Within the educational establishments environment this might include; when inappropriate physical contact takes place through inappropriate supporting, 'spotting', treatment or touching.

**Emotional abuse includes situations in which:**

- There is a persistent lack of love, affection or attention shown to a child or young person
  - Children or young people are overprotected preventing them from socialising
  - Children or young people are frequently shouted at, humiliated or taunted
    - Within the educational establishments environment this might include; constant criticising, bullying or unrealistic pressure to achieve or succeed using VR learning content.

**Sexual Exploitation**

The sexual exploitation of children and young people is a hidden form of abuse and Virtucate VR Ltd actively promotes awareness Safeguarding and Promoting the Welfare of Children who are at Risk of Abuse through Sexual Exploitation. Child/young people sexual exploitation is the coercion or manipulation of children and young people into taking part in sexual activities. It is a form of sexual abuse involving an exchange of some form of payment which can include money, mobile phones and other items, drugs, alcohol, a place to stay, 'protection' or affection. The vulnerability of the young person and grooming

process employed by perpetrators renders them powerless to recognise the exploitative nature of relationships and unable to give informed consent.

This information is not exhaustive and further guidance can be sought at: <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/child-sexual-exploitation/>

There is also the **Abuse of Trust** - Where children/young people are indoctrinated with attitudes and to social, political and religious views which are unacceptable to the child's/young person's family, community or school/group.

The inappropriate use of photographic material taken at events is an area of abuse that is increasing and all those involved should be aware of this.

All forms of bullying, both verbal and physical, from other children /young people is also a form of abuse and there is a requirement for all to ensure that there are sufficient mechanisms to allow children/young people to report instances of bullying.

This Policy document should be read in conjunction with information contained at:

<https://learning.nspcc.org.uk/safeguarding-child-protection>

#### **Storage of child protection records**

- Virtucate VR Ltd will ensure that our child and young person protection records whether electronic or paper based are always kept confidential and stored securely.
- Electronic files will be password protected and stored on computers with protection from hackers and viruses.
- Information about child and young person protection concerns and referrals will be kept in a separate file for each child and/or young person. The child and/or young person protection individual file will be commenced as soon as Virtucate VR Ltd Designated Safeguarding Officer becomes aware of any concerns.
- If there is a separate child protection file, the general file will be marked accordingly indicating this.
- If Virtucate VR Ltd needs to share records – within Virtucate VR Ltd or externally - Virtucate VR Ltd will always ensure these are kept confidential
- When sharing electronic files these will be password and encrypted enabled

- If the Designated Safeguarding Officer responsible for managing child and/or young person protection records leaves Virtucate VR Ltd, we will ensure to appoint somebody to take over their role and responsibilities and ensure a proper handover is conducted

### **Recording Concerns About Adult Behaviour**

An adult who works for Virtucate VR Ltd.

- behaved in a way that has harmed, or may have harmed, a child and/or young person
- committed a criminal offence against, or related to, a child and/or young person
- behaved in a way that indicated they are unsuitable to work with children or young people

Virtucate VR Ltd will keep clear and comprehensive records of all allegations made against adults working for Virtucate VR Ltd, including:

- what the allegations were
- how the allegations were followed up
- how things were resolved
- any action taken
- decisions reached about the person's suitability to work with children or young people

Virtucate VR Ltd will keep correct and concise records which will enable Virtucate VR Ltd to give accurate information if ever asked for it.

For the following:

- in response to future requests for a reference
- if a future employer asks for clarification about information disclosed as part of a vetting and barring check
- if allegations resurface after a period of time.

### **Storing Records Relating to Adults**

Records relating to concerns about an adult's behaviour will be kept in the person's confidential personnel file and a copy will be given to the individual.



### **Retention Periods: Concerns About Adults**

If concerns have been raised about an adult's behaviour around children and/or young people:

- Records in their personnel file will be kept at least until they reach their normal retirement age or for 10 years – whichever is longer (IRMS, 2019; Department for Education, 2022). This applies to all paid staff.
- If someone is 60 when the investigation into the allegation is concluded, Virtucate VR Ltd will keep the records until their 70th birthday
- If someone is 30 when the investigation into the allegation is concluded, Virtucate VR Ltd will keep the records until they are aged 65.

Virtucate VR Ltd will keep records for the same amount of time regardless of whether the allegations were unfounded. However, if Virtucate VR Ltd find that allegations are malicious Virtucate VR Ltd will destroy the record immediately.

### **Criminal Records Checks**

Virtucate VR Ltd will only store copies of criminal records check certificates if there is a dispute about the results of the check.

A confidential record will be kept of:

- the date the check was completed
- the level and type of check (standard/enhanced/barred list check and the relevant workforce)
- the reference number of the certificate
- the decision made about whether the person was employed (with reasons). If there is a dispute about the results of a check, Virtucate VR Ltd will keep a copy of the certificate for no longer than six months.

### **Destruction of Child Protection Records**

When the retention period is finished, confidential records will be incinerated or shredded in the presence of a member of Virtucate VR Ltd or entrusted to a firm specialising in the destruction of confidential material. At the same time, any electronic versions of the record will be purged. If not shredded immediately, all confidential records will be held in a secured plastic bag, labelled as confidential and locked in a secure cupboard or other secure place.

### **Reviewing Your Child Protection Records Retention and Storage Policy**

Virtucate VR Ltd will review their child and/or young person protection records retention and storage policy regularly to make sure it is effective and continues to comply with current legislation and guidance. This will be carried out as part of our wider review of our safeguarding policies and procedures. If we, Virtucate VR Ltd, make amendments to our child and/or young person protection records retention and storage policy, Virtucate VR Ltd will keep a copy of the original version, including a record of the amendments made and why. Virtucate VR Ltd will clearly mark the old version so it's clear it has been superseded.

### **Key Legislation Affecting the Retention and Storage of Child Protection Records Includes:**

- UK The Information Commissioner's Office provides a guide to the GDPR to help organisations comply with its requirements.
- England Data Protection Act 2018 Fostering Services (England) Regulations 2011
- Children's Homes (England) Regulations 2015 Statutory guidance on adoption for local authorities, voluntary adoption agencies and adoption support agencies

## Dealing with Allegations or Concerns about an Adult Working with Children and Young People

Allegation or concern raised about a member of staff or adult

Does it meet the harm threshold?

The harm threshold is met where it is alleged that an adult working for Virtucate VR Ltd has:

\*behaved in a way that has harmed a child or young person, or may have harmed a child or young person and or \*possibly committed a criminal offence against or related to a child or young person and/or \*behaved towards a child or children or young person(s) in a way that indicates he or she may pose a risk of harm to children or young people; and/or \* behaved or may have behaved in a way that indicates they may not be suitable to work with children  
You may wish to consider the questions in Box A below to help you decide the answer to this question.



NO

NOT SURE

YES



Contact: Designated Lead Safeguarding Officer

07788235128

Mr Luke Fey – Virtucate VR Ltd

This is a low-level concern. Consider carefully what action to take in response. Virtucate VR Ltd will keep a copy in a secure safe and confidential file stored in a safe and secure locked cupboard.

Virtucate VR Ltd Designated Lead Safeguarding Officer will ask for specific information about the issue and confirm whether or not it meets the harm threshold. If it does, they will begin a formal process to manage the allegation. If it doesn't meet the threshold, then they will record the information and advise you to treat the issue as a Low-Level Concern. The Designated Lead Safeguarding Officer will need to inform the staff members that Virtucate VR Ltd hold information on them.

**Box A:**

- \*How long has the adult or member of staff worked at Virtucate VR Ltd?
- \*Have there been any previous concerns raised?
- \*Is this a one-off or part of a pattern of behaviour?
- \*Has the member of staff previously been given advice in this area?
- \*Would an associated pattern behaviour (if it exists) be seen by others? (How closely do they work with other colleagues of Virtucate VR Ltd?)
- \*Might this have been a planned action or event?
- \*Could this behaviour be inadvertent? What is the likelihood of this?
- \*Could this be the precursor to more concerning behaviour?
- \*If electronic devices are involved, have any relevant files been deleted and is there any evidence of this?
- \*If this relates to inappropriate language, what is the precise nature of this language used? How inappropriate is it? What was the context – where was this, and who were the listeners? Could this be seen as ‘banter’ or might it have more serious undertones?

**Appendix 1: Virtucate VR Ltd Safeguarding Standards**

This standard framework is from Keeping Children Safe “Safeguarding Standards” and adapted for use for Virtucate VR Ltd. Each standard can be met in whole, in part or not met.

<b>Standard</b>	<b>Potential evidence of standard being met</b>
<b>1. Policy</b>	
1.1 The organisation, Virtucate VR Ltd, has a clear safeguarding policy that seeks to prevent harm to children, young people and vulnerable adults	A copy of the policy, signed by the management/owners
1.2 Policies are publicised to staff, educational establishments, and corporate organisations	Policy or summary given where necessary to whom
<b>2. People</b>	
2.1 Virtucate VR Ltd places clear responsibilities and expectations on its staff and supports them to understand and act in line with these	Clear responsibilities for a Designated Lead Safeguarding Officer at appropriate level
2.2 There are written guidelines for appropriate and inappropriate behaviour	A written code of conduct; evidence of this being shared with staff
2.3 There are appropriate learning and training/work experience opportunities to develop and maintain the necessary attitudes,	A copy of work experience, work placement records, work experience attendance records and evidence of induction for Virtucate VR Ltd volunteers, work experience placements

skills and knowledge to keep vulnerable people safe.	and student work experience. A copy of students' initial interview for work experience or work placement together with work experience and work placement feedback to their education establishment(s) and/or mentors or trust or youth charity
2.4 There are procedures for responding to safeguarding concerns arise	A copy of a concern/allegation to management/owners
2.5 Implementation of safeguarding policies and procedures is monitored	Copies of reporting to management/owners
2.6 Learning from issues captured and informed future policy and reviews	Incident reports produced
2.7 Policies and procedures reviewed at least every three years	Evidence of review in annual plans / strategies

Virtucate VR Ltd commits to monitoring the implementation of the safeguarding policy. This policy will be reviewed every three years and earlier if necessary.

This policy was last reviewed on: 25<sup>th</sup> March 2023

Signed: *L.Fry*

25<sup>th</sup> March 2023