

Reflect On Academy Various Policies for Website

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Reflect On Academy Concerns & Complaints Procedure

Statement

Reflect On Academy is committed to providing a fair, respectful and supportive learning environment. There may be occasions when a student is dissatisfied with an aspect of their course, the service provided by the College, or the conduct of another person within the learning community.

Students are encouraged to raise concerns as early as possible so that they can, where appropriate, be clarified and resolved before they become more difficult to address. Reflect On Academy also seeks student feedback through its established evaluation and quality-assurance processes.

This procedure is intended to provide a clear, fair and proportionate process for raising and resolving concerns and complaints.

Scope

This procedure applies to concerns or complaints about the student experience, College services, the application of College procedures, or the conduct of staff, students or others acting on behalf of Reflect On Academy.

Concerns relating specifically to an assessment decision, academic judgement, clinical practice assessment, placement decision or progression decision must be raised through the College's Appeals Policy where that policy applies.

Submitting a complaint does not automatically extend or suspend a deadline under the Appeals Policy. Where a matter contains both a complaint and an assessment appeal, Reflect On Academy may separate the issues and consider each under the appropriate procedure.

Basic Principles

1. Concerns and complaints should normally be raised informally in the first instance, where it is appropriate and safe to do so. Informal discussion can provide an opportunity for clarification and early resolution without the need for a formal process.
2. The informal stage may be varied or bypassed where the nature of the concern makes this inappropriate, including matters involving safeguarding, abuse, discrimination, serious professional misconduct, significant health and safety concerns, or where the complaint concerns the person who would ordinarily deal with the matter.
3. Students are expected to engage reasonably with the procedure and with information, guidance, meetings and responses provided by the College. Where relevant information has already been provided, students are expected to consider that information before escalating the same matter.
4. Students and staff are expected to communicate respectfully throughout the process. Difficult, challenging or critical complaints will not be rejected simply because they are uncomfortable to receive. However, unreasonable, abusive, threatening or persistently repetitive communication

may be managed in accordance with this procedure and the College's Behaviour and Conduct Policy.

5. Fee and refund entitlement is determined in accordance with the College's Fee Policy and applicable student agreement. A student may nevertheless raise a complaint where they believe that the relevant policy has not been applied correctly.
6. Complaints should normally be made by the student concerned and considered in relation to that student's individual circumstances. Where similar concerns are raised by more than one student, the College may determine whether it is appropriate to consider any common issues together while continuing to recognise each student's individual circumstances.
7. Complaints will be treated confidentially. Information will be shared only with those who reasonably need it in order to consider, investigate or respond to the complaint, or where disclosure is required for safeguarding, regulatory, professional or legal reasons.
8. Concerns should normally be raised within seven days of the matter arising or becoming known to the student. Where a concern is raised outside this period, the College may consider it where there are reasonable grounds for the delay.
9. Students are expected to complete the appropriate internal College procedure before seeking escalation to an awarding organisation, accrediting body or professional regulator where that body's own procedure requires internal processes to have been exhausted. Nothing in this procedure prevents a person from seeking independent advice or exercising any statutory, safeguarding or regulatory right available to them.

Procedure for Students

Stage 1 – Informal Resolution

Where appropriate, a student should first raise the concern with their tutor or another appropriate member of the tutor team, normally within seven days of the matter arising.

The student should arrange a time to discuss the matter outside of class, with the aim of explaining the concern fully and considering whether it can be resolved informally.

The discussion may take place in person, online, by telephone or through another appropriate arrangement. Where a student requests an adjustment to enable them to access or participate in the complaint's procedure, the College will consider the request in accordance with the Reasonable Adjustments section below.

At the end of the discussion, the student will normally be asked whether they consider the matter resolved.

The informal stage is intended primarily as a discussion rather than an extended exchange of written correspondence. Reflect On Academy may make or provide a written record of the discussion or agreed outcome where appropriate.

Where the complaint concerns the student's tutor, the student does not feel able to raise the matter with that tutor, or an informal discussion would otherwise be inappropriate, the student may proceed directly to Stage 2.

Stage 2 – Referral to the College

Where Stage 1 has not resolved the concern, or Stage 1 is not appropriate, the student should contact the Admin Team at: **adminroa@btinternet.com**

The student should briefly identify the concern and any steps already taken to resolve it.

An appropriate member of the College will then arrange a discussion with the student so that the concerns can be considered further. The College will seek to clarify the issues, identify what remains unresolved and determine whether an informal resolution remains possible.

Stage 3 – Formal Written Complaint

Where the matter remains unresolved, the student may submit a formal written complaint.

The complaint should clearly set out:

- the matter being complained about;
- the relevant circumstances and dates;
- the steps already taken to seek resolution;
- any relevant supporting information or evidence; and
- the outcome the student is seeking.

Reflect On Academy will appoint an appropriate person to consider or investigate the complaint.

Where reasonably practicable, that person would not have been directly responsible for the matter complained about.

Where the complaint concerns another person, sufficient relevant information will be shared with that person to allow them a fair opportunity to respond. The College will not automatically circulate the entire complaint or unrelated confidential information where this is unnecessary.

Where appropriate, the College may discuss with the parties whether mediation or another form of Alternative Dispute Resolution would assist. Mediation will only take place where the relevant parties agree that it is appropriate.

The outcome of the formal complaint will be communicated to the student in writing, together with the principal reasons for the decision and any action that the College considers appropriate.

Stage 4 – External Review

Where the College's internal complaints procedure has been completed and the student remains dissatisfied, they may be able to approach the relevant awarding organisation, accrediting body or professional regulator, depending upon the programme and the nature of the complaint.

Reflect On Academy will provide information about the appropriate external body where applicable.

The College will cooperate appropriately with an external review and will comply with any decision that is binding upon it.

Unreasonable or Persistent Contact

Reflect On Academy recognises a student's right to pursue a concern or complaint and will not treat persistence alone as misconduct. However, students are expected to engage reasonably with the procedure and with responses already provided.

Where the College has provided relevant information, responded to a concern, offered an appropriate meeting or discussion, or directed a student to the applicable procedure, repeatedly raising the same matter without providing materially new information does not require the College to provide repeated substantive responses.

Contact may be considered unreasonable or persistent where, for example, a student repeatedly raises substantially the same matter after it has been addressed; sends excessive communications about the same issue; repeatedly approaches different members of staff in an attempt to obtain a different response; demands responses within unreasonable timescales; repeatedly resubmits questions that have already been answered; or declines to engage with the procedure offered by the College while continuing to escalate the same matter.

Where this occurs, Reflect On Academy will normally explain its concerns to the student and provide an opportunity for the student to modify the way in which they communicate or engage with the process.

Where unreasonable or persistent contact continues, the College may take proportionate steps to manage communication. This may include nominating a single member of staff as the point of contact, specifying an appropriate method or frequency of communication, responding only where genuinely new and relevant information is provided, or confirming that correspondence on a particular matter has concluded.

These arrangements will not prevent a student from raising a genuinely new concern, providing materially new evidence, raising a safeguarding concern or exercising a statutory or regulatory right.

Aggressive, Offensive or Abusive Behaviour

Reflect On Academy will not tolerate threatening, abusive, discriminatory or intimidating behaviour towards staff, students or others involved in the complaints process.

Where behaviour is considered unacceptable, the student will normally be informed of the concern and, where appropriate, given an opportunity to modify their behaviour.

Serious or continuing behaviour may be dealt with under the College's Behaviour and Conduct or disciplinary procedures. Any action taken in relation to behaviour will be considered separately from the substance of a genuine complaint wherever reasonably practicable.

Procedure Where Reflect On Academy Raises a Concern About a Student

Stage 1 – Informal Concern

Where appropriate, one or more members of the tutor team or other appropriate Reflect On Academy staff may speak with a student informally about a concern relating to their conduct, engagement, professional development or other course-related matters.

The student will be given an opportunity to understand and respond to the concern.

Stage 2 – Formal Notification

Where the matter cannot be resolved informally, where the student cannot reasonably be contacted, or where the seriousness of the concern makes informal resolution inappropriate, the Course Director or designated officer may write to the student setting out the concern and requesting a response.

The student will normally be given seven days to respond unless the circumstances require a different reasonable timeframe.

Where a concern has been raised by another student, member of staff or third party, the procedure may begin at this stage. Relevant information will be provided to the student to enable them to understand and respond to the concern, subject to appropriate confidentiality and safeguarding considerations.

Precautionary Measures

Where reasonably necessary to protect students, clients, staff, the integrity of an investigation or professional standards, Reflect On Academy may put temporary precautionary arrangements in place while a matter is considered.

This may include temporary restrictions on attendance, placement or other College activity.

Any such measure will be proportionate to the circumstances and will not, in itself, constitute a disciplinary finding. The student will normally be informed of the reason for the measure and it will be reviewed as appropriate.

Stage 3 – Decision

Following consideration of the student's response, or where the student does not respond within the specified timeframe, the Course Director or designated officer may determine the matter on the information reasonably available.

The student will be informed in writing of the outcome, the principal reasons for the decision and any action or requirements arising from it.

Failure to respond does not automatically determine the outcome against the student but may result in the College proceeding on the basis of the available information.

Stage 4 – Internal Appeal

A student who disagrees with the decision may submit a written appeal within seven days of receiving the outcome.

The appeal should identify the grounds upon which the student believes the decision should be reconsidered, for example a material procedural error, significant new evidence that could not reasonably have been provided earlier, or a decision that the student believes was unreasonable in the circumstances.

The appeal will be considered by the Principal or another appropriately senior nominee who, wherever reasonably practicable, was not materially involved in the original decision.

The student will normally receive the outcome of the internal appeal in writing within 28 days.

The appeal decision will represent the conclusion of the College's internal procedure for that matter, subject to any separate right of appeal or external review that may apply.

Exceptions and Serious Concerns

Concerns involving safeguarding, abuse, serious professional misconduct, discrimination, significant health and safety risk or risk to clients or others may be referred immediately to the appropriate stage of this procedure or dealt with under another relevant College procedure.

Reflect On Academy may also refer a matter to an appropriate external authority, professional body, placement provider or safeguarding agency where this is reasonably necessary or required.

Where staff absence, illness, complexity of the matter or other circumstances create an unavoidable delay, the parties will be informed and given an indication of the revised timeframe where possible.

Reasonable Adjustments to the Complaints Process

Where a student requests a reasonable adjustment to enable them to access or participate in the complaints procedure, the student is responsible for informing the College of the relevant need and providing appropriate supporting evidence. Evidence should normally be provided by a suitably qualified professional and should assist the College in understanding how the condition or need affects the student's participation in the process.

Where appropriate evidence is already held by the College, the student will not normally be required to provide it again. Where the nature or impact of the need has not previously been evidenced, formal reasonable adjustments will not normally be agreed solely on the basis of self-report.

Any adjustment will be considered individually and must be reasonable and proportionate. An adjustment may change the way in which the complaints procedure is accessed or conducted, but it does not remove the student's responsibility to engage with the procedure or alter the substantive requirements of the process.

Recording, Confidentiality and Review

The outcome of formal complaints and investigations will be recorded and retained confidentially in accordance with the College's Data Protection and records-retention arrangements.

Relevant outcomes may be reported confidentially to the College Leadership Team. The College will maintain a record of complaints and periodically review anonymised themes and outcomes as part of its quality-assurance and improvement processes.

Reflect On Academy Equality and Diversity Policy

Purpose of the Policy

Reflect On Academy is committed to the advancement of equality, diversity and inclusion and has embraced the FREDIE principles of Fairness, Respect, Equality, Diversity, Inclusion and Engagement.

Reflect On Academy is committed to meeting its responsibilities under the Equality Act 2010 and any other equality duties applicable to the College. We will have regard to the need to eliminate unlawful discrimination, advance equality of opportunity and foster good relations within our learning community.

Equality Opportunities Statement of Intent

Reflect On Academy recognises that diversity, equality, and inclusion are concepts that should underpin all aspects of the academy. This brings significant benefits to all staff and students, enabling the creation of learning experiences enriched by different life experiences, varied perspectives, flexibility, and creativity.

It is the Reflect On Academy's policy to accept and celebrate diversity; any form of intolerance is counterproductive and unacceptable. Reflect On Academy is therefore committed to building an environment where:

- All students and staff are treated with dignity and respect.
- Diversity is valued.
- Stereotypes are questioned.
- Bias, bigotry, prejudice, and racism are wholeheartedly rejected.

Equality and diversity are at the heart of our vision and are reflected in our four values:

- Integrity
- Excellence
- Equality
- Acceptance and Respect

Equality Objectives

- a Eliminate unlawful discrimination, harassment, victimisation, bullying and any other conduct prohibited by the Act.
- b Advance equality of opportunity between people who share a protected characteristic and people who do not share it.
- c Foster good relations between people who share a protected characteristic and people who do not share it.

Equality and Diversity Statement

Our goal is to support all students to succeed, and we will provide appropriate learning support and reasonable access arrangements in accordance with programme requirements and the College's responsibilities.

Reflect On Academy is committed to providing high-quality education and training that reflect best practices in equality and diversity.

Reflect On Academy will be a vibrant college, inspiring all our students to fulfil their dreams and ambitions. Our outstanding training will contribute to a prosperous and cohesive community.

The college encourages active participation from all segments of the community and will work to provide learning opportunities that accommodate diversity while also raising students' and staff's aspirations and achievements.

We are committed to increasing the diversity of our workforce and to meeting the different needs of our students. We aim to provide an environment in which everyone, regardless of their background and identity, can study and work to the best of their ability.

Code of Practice

1. Reflect On Academy is committed to actively oppose oppression and discrimination in all areas of our work, and in relation to trainees, staff, committee members, outside trainers/facilitators and other organisations with whom we work.
2. Reflect On Academy will work in accordance with the Equality Act 2010 and fully supports its aims and protections.
3. We will take seriously our duty not to discriminate against anyone on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.
4. All policies and practices associated with Reflect On Academy, both in its role as an employer and provider of training must be applied with strict observance of (2) above.
5. Reflect On Academy criteria, policies and procedures for trainees, trainers and staff will be monitored and reviewed at least annually.

6. In offering training or employment or in its general dealings, Reflect On Academy will ensure that all individuals are treated with fairness and in line with equal opportunities policy and practice.
7. We will seek to ensure that any outside trainer/facilitator used by Reflect On Academy works within equal opportunities guidelines and we will take seriously any accusation of discrimination by them towards trainees.
8. Discriminatory acts or breaches of the equal opportunities policy by staff will be taken seriously and may lead to disciplinary action.
9. Trainees, applicants, members, and staff who feel they have been discriminated against should use the complaints procedure.
10. Responsibility for the implementation of the Equality and Diversity Policy lies with the Course Director, who will monitor and review the policy annually and make recommendations for improvement where necessary.

Procedures

The College's Concerns & Complaints Procedure is the appropriate process for raising concerns relating to equality, diversity or discrimination. Allegations that a student or member of staff has breached this policy will be considered under the appropriate College procedure.

Reasonable Adjustments

Reflect On Academy will consider reasonable adjustments for students with a disability, long-term health condition, specific learning difference or other recognised need that may affect their access to learning or assessment. Students are encouraged to inform the College of relevant needs as early as possible.

Where the nature or impact of a condition is not already known or apparent, the College may require appropriate supporting evidence from a suitably qualified professional before formal reasonable adjustments are agreed.

Adjustments will be considered individually and must be reasonable and proportionate. Reasonable adjustments do not remove programme learning outcomes, reduce the required academic or professional standard, waive clinical competence requirements or guarantee a particular assessment outcome.

RESPONSIBILITIES AND BEHAVIOURS

Employees have a responsibility to promote equality and diversity in all aspects of their work.

Director Quality of Education

Director is responsible for providing a strategic lead and direction to ensure all learners and staff are enabled to achieve their full potential, and that ROA College is seen as a beacon of excellence.

Senior Management Team

Admissions criteria must be applied fairly, consistently and without unlawful discrimination. Legitimate academic, professional and suitability requirements may be applied where they are relevant to the programme and proportionate to its requirements.

Course Managers

Admissions criteria must be applied fairly, consistently and without unlawful discrimination, while recognising legitimate academic, professional and suitability requirements.

Tutors/Lecturers and Learning Support Staff are required to

Provide high expectations of all learners, ensure curriculum materials do not exclude any individual or group of learners, use teaching materials, content and methods that take into account diverse learning needs, styles and preferences, enable learners to question and test received wisdom, create a classroom ethos and learning environment that is inclusive, provide guidance and referrals to additional support services, adopt marking policies and assessment methods that treat all learners impartially, take appropriate and immediate action in the event of harassment, victimisation or discrimination, and address any issues of stereotypical attitudes and prejudiced thinking.

Business and Support Managers

Are required to ensure that equality and diversity issues are addressed. Staff must ensure equality and diversity issues are addressed in quality reviews, recruitment, training, promotion, appraisal, and development.

Reflect On Academy Safeguarding and Child Protection Policy

Safeguarding and Child Protection Policy

Introduction

Safeguarding is the responsibility that Reflect On has to ensure that their employees, students and volunteers, partners, vendors, operations and programmes do no harm to children, young people or adults at risk (together referred to as 'vulnerable people' under this policy); that they do not expose them to the risk of discrimination, neglect, harm and abuse; and that any concerns the organisation has about the safety of vulnerable people within the communities in which they work, are dealt with and reported to the appropriate authorities. It is also the responsibility that the organisation has for protecting its employees and volunteers when they are vulnerable, for example, when ill or at risk of harm or abuse.

Child protection is a central part of but not separate to safeguarding. It is the process of protecting individual children identified as either suffering or at risk of significant harm because of abuse or programme of work. It also includes measures and structures designed to prevent and respond to abuse.

Over recent years, there has been increasing recognition of the way in which children, young people, and adults at risk of discrimination, neglect, abuse and exploitation by those who are in positions of trust and power over them, including through international development activities. Consequently, there has been a significant increase in the efforts made by development organisations to ensure that no harm results from the contact their employees, volunteers and other representatives have with their target populations or communities.

Through their work, Reflect On employees, volunteers and students may engage with young people and vulnerable adults either directly or indirectly. Reflect On recognises it has an obligation to put in place all reasonable safeguarding measures to ensure, as far as possible, the safety and protection of children, young people and adults at risk, including those with whom we work and those in the communities where Reflect On work is undertaken.

Purpose

The purpose of this policy and associated procedures is to provide clarity to ALL on how they should engage with children, young people and adults at risk when working for, on behalf of, or in partnership with Reflect On. It is also to help us make sure that employees, volunteers, and other representatives are protected. It is intended to help us to have a common understanding of safeguarding issues, develop good practice across the diverse and complex areas in which we operate and thereby increase accountability in this crucial aspect of our work.

Any breach of this policy will be treated as a disciplinary matter, which may result in immediate termination of employment or contract, withdrawal of volunteer status, withdrawal of student

status and could result in the person in breach of the policy being subject to further action where appropriate.

Definitions

Abuse - a violation of an individual's human and civil rights by any other person or persons. It can take the form of physical, psychological, financial, or sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the health, survival, development or dignity of a child, young person or adult at risk. Abuse can be a single act or repeated acts and can be unintentional or deliberate. Abuse often involves criminal acts.

Discriminatory abuse – abuse motivated by a vulnerable person's age, race, nationality, sex, sexual orientation, disability, or other personal characteristic.

Financial or material abuse - including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions, or benefits.

Neglect - the persistent failure to meet a vulnerable person's basic physical and/or psychological needs, likely to result in the serious impairment of his/her health or development. Examples include failure to provide adequate food, clothing and shelter, failure to protect them from physical or psychological harm or danger; failure to ensure adequate supervision (including the use of inadequate caregivers); or failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a vulnerable person's basic emotional needs.

Physical abuse – includes hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm, misuse of medication, restraint, or inappropriate sanctions.

Psychological abuse - includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks. Examples include not giving a vulnerable person opportunity to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on a vulnerable person, which may include interactions that are beyond a vulnerable person's developmental capability. It may involve serious bullying (including cyber bullying), or the exploitation or corruption of a vulnerable person.

Sexual abuse - involves forcing, enticing or coercing someone to take part in sexual activities, whether or not the vulnerable person is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving a vulnerable person in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave

in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse can be carried out by adults or other children.

Child – Reflect On regards a child as anyone under the age of 18 years, irrespective of the age of majority in the country in which the child lives or in their home country. It is widely recognised that children are generally more vulnerable to abuse and exploitation due to factors such as age, gender, social and economic status, developmental stage, and dependence on others.

Vulnerable person/people – for the purposes of this policy this is an umbrella term which covers children, young people, and adults at risk.

Adults at risk - a person, 18 years and above, who by reason of disability, age, gender, social and economic status, or illness, the context they are in, may be unable to take care of or to protect him or herself against abuse, harm, or exploitation.

Youth or young people - individuals aged 15 to 25 (15 to 35 in some countries) – Reflect On recognises that this group spans the categories of ‘children and ‘adults’ but regards young people as having particular safeguarding needs and requiring distinct consideration aside from younger children and older adults.

Policy Statement

Reflect On has zero tolerance against abuse and exploitation of vulnerable people. Reflect On 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 vulnerable people with whom we work and those in the communities in which we live.

Reflect On works to the following key principles to protect vulnerable people:

- Everyone has an equal right to protection from abuse and exploitation regardless of age, race, sex, sexual orientation, marriage and civil partnership, pregnancy or having a child, gender reassignment, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
- The best interests of the vulnerable person are paramount and shall be the primary consideration in our decision making.
- Reflect On will take responsibility to meet our obligations regarding our duty of care towards vulnerable people, and take action where we believe that a child, young person or adult at risk is at risk of harm or is actually harmed.
- When working with or through partners or subcontracted agencies, Reflect On will ensure that their safeguarding procedures are consistent and in line with the principles and approaches set out in this policy.
- Reflect On respects confidentiality and has a responsibility to protect sensitive personal data. 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.
- Reflect On commits to monitoring the implementation of the safeguarding policy. This policy will be reviewed every three years and earlier if necessary.

Responsibilities

All employees, volunteers, students, sub-contractors, partner organisations and visitors are obliged to follow this policy and maintain an environment that prevents exploitation and abuse, and which encourages reporting of breaches of this policy using the appropriate procedures.

All people working with Reflect On will:

- Read, understand, and adhere to the Safeguarding Policy
- Strive to promote a zero-tolerance approach to discrimination, sexual harassment, and abuse in all working environments.
- Place the safety and welfare of children and vulnerable people above all other considerations.
- Report any concerns they may have about the welfare of a child or vulnerable person
- Report any concerns they may have about the behaviour of a Reflect On representative in relation to safeguarding.
- In a one-to-one situation with a child or young person, where privacy and confidentiality are important, try to make sure that another adult knows the contact is taking place and why.

All people working with Reflect On will not:

- Sexually harass, assault or abuse another person
- Physically harass, assault or abuse another person
- Emotionally abuse another person, such as engaging in behaviour intended to shame, humiliate,
- belittle or degrade
- Condone, or participate in behaviour which is abusive, discriminatory, illegal, or unsafe
- Develop, encourage or fail to take appropriate action in relation to relationships with children or other vulnerable people which could in any way be deemed sexual, exploitative or abusive
- Act in ways that may be violent, inappropriate or sexually provocative
- Agree with a child to keep a secret which has implications for their safety or the safety of other young people.

Recruitment and Selection:

- Where an employee, volunteer or student is engaged in 'regulated activity' (direct work with vulnerable individuals), an enhanced DBS check will be undertaken.

Data Protection

- Ensure that personal information is kept confidential unless we have the agreement of the individual and/or their parent/guardian, except where it is necessary to pass this to a specialised child welfare or law enforcement agency in relation to a safeguarding incident

Minimum Standards

Where employees or volunteers are contracted by other employers, or when working with partners, sub contracted agencies, Reflect On will brief them on our safeguarding policy and ask for information on how the organisation works to protect vulnerable people and ensure that they meet our Safeguarding Standards.

Raising and responding to concerns

Reflect On places a mandatory obligation on all employees, students, volunteers, contractors and partners to report concerns, suspicions, allegations and incidents which indicate actual or potential abuse or exploitation of vulnerable people, or which suggests this policy may have in any other way been breached. It is not the responsibility of the employees or students to decide whether or not abuse has taken place, however, concerns should be raised with the Director of Counselling or Course Tutor, who will initiate the procedure for dealing with suspected or actual incidents of abuse.

Pathway for reporting concerns

The course director and course tutors are responsible for ensuring that the reporting procedure is followed so that suspected or actual cases of abuse are responded to appropriately and consistently and referred to the relevant statutory authority.

To ensure that all such situations are handled appropriately and effectively:

- Reports must be made, and decisions and actions taken
- Reflect On is not an investigative authority. It is essential that referrals are made to the relevant law enforcement agency to ensure that appropriate protection and support is given to the vulnerable individual, and that any evidence is collected in accordance with the law.
- All sensitive and personal data must be kept confidential (including the names of anyone who makes a report of abuse), and be shared on a strictly 'need to know basis', that is, access must be necessary for the conduct of one's official duties.
- Where a Reflect On employee or student is the subject of an investigation, the Course director will lead the case.

