

# **Verto Education London Safeguarding Policy**

## **INTRODUCTION**

- 1.1 Verto Education London is committed to ensuring the safety of everyone involved in Verto activities. This includes the duty of care to safeguard children, young people and adults at risk during interactions relating to Verto activities, irrespective of duration or location.
- 1.2 Verto Education London recognises that as an organisation it has the responsibility to safeguard and promote the welfare of participants under the age of 18, and that it also needs to ensure any partnering organisation adheres to the relevant statutory and non-statutory safeguarding guidance including 'Keeping Children Safe in Education' KCSIE.
- 1.3 It is recognised that as partners with the organisation we both have a duty to comply with relevant UK legislation. This includes the UK Data Protection Act 1998, and current legislation/statutory guidance to the safeguarding and protection of children and vulnerable adults including, the 'The Children Act,' and 'Safeguarding Vulnerable Groups Act, 2006'). We will also comply with relevant legislation in partnering countries when planning and executing a mobility.
- 1.4 This policy applies to all staff, faculty and students (irrespective of whether they act in a paid or unpaid capacity), who may be working with students including children, young people or vulnerable adults through Verto's teaching and other initiatives. Children, young people and vulnerable adults will be referred to within this policy as 'vulnerable groups'.
- 1.5 Whilst this policy sets out Verto's general responsibilities in ensuring the protection of vulnerable groups, it will also be necessary for appropriate local provisions to be made in a number of areas of Verto, depending on the nature of their activities. As such, those expecting to work with vulnerable groups (regularly or occasionally) should always refer to any more detailed local guidance, and/or the relevant safeguarding officer or service leader, alongside this policy.
- 1.6 It is assumed generally that all individuals will conduct themselves in a professional manner with integrity, upholding the reputation of Verto at all times, in line with Verto's policies and procedures, and in particular our [Code of Responsibility](#).

## **2. LEGAL FRAMEWORK**

- 2.1 This policy statement should be read alongside our organisational policies, procedures, guidance and other related documents:
  - role description for the designated safeguarding officer
  - managing allegations against staff and volunteers
  - recording concerns and information sharing
  - code of conduct for staff and volunteers

- behaviour codes for students and young people
- safer recruitment
- whistleblowing
- health and safety
- induction, training, supervision and support

### **3. POLICY STATEMENT**

#### **3.1 Verto Education London believes that:**

- Children, students and young people should never experience abuse of any kind
- we have a responsibility to promote the welfare of all students including children and young people, to keep them safe and to practise in a way that protects them.

Verto Education London recognises that:

- the welfare of our students is paramount in all the work we do and in all the decisions we take
- all students and staff 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

#### **3.2 Verto Education London will seek to keep students and young people safe by:**

- developing and implementing an effective online safety policy and related procedures
- 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 [more information about this is available from the Information Commissioner's Office: [ico.org.uk/fororganisations](https://ico.org.uk/fororganisations)]
- sharing information about safeguarding and good practice with students, and their families via email communication, pre-arrival webinars, onsite orientations, posters, group work and one-to-one discussions
- making sure that students, young people and their families know where to go for help if they have a concern

- sharing concerns and relevant information with agencies who need to know, and involving students including children, young people, parents, families and carers appropriately
- managing any allegations against staff 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
- applying health and safety measures in accordance with the law and regulatory guidance
- building a culture where staff and volunteers, students including children and young people and their families, treat each other with respect and are comfortable about sharing concerns.

#### 4. **POLICY AIMS**

- 4.1 This policy aims to provide clarity on Verto's legal obligations relating to vulnerable groups and identifies the key responsibilities relating to safeguarding for all individuals associated with Verto, including students under the age of 18.
- 4.2 This policy does not seek to discourage activity that contributes positively to Verto's interest and/or has community value; instead, it seeks to ensure an environment free from harm and offer ongoing assurance to staff, students and visitors that their experience at Verto will be a positive one. Ultimately, it aims to facilitate the management of the risk associated with the duty to protect vulnerable groups.
- 4.3 Vulnerable groups are as follows: A 'child' is defined as a person under 18 years of age: where the context specifically relates to older children, the term 'young person' is used. A 'vulnerable adult' is broadly defined as someone aged 18 or over who may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of themselves, or unable to protect themselves against significant harm or exploitation either temporarily or permanently.
- 4.4 At times it may not always be explicitly obvious that a person or group (regardless of age) may be considered vulnerable. Although the list below is not exhaustive, a person is likely to be considered vulnerable if they:
- have a learning or physical disability; or
  - have a physical or mental illness, chronic or otherwise, including an addiction to alcohol or drugs; or
  - have a reduction in physical or mental capacity.

4.5 The following examples are indicators that may suggest a person is to be considered vulnerable, because either temporarily or permanently they are:

- being detained in custody; or
- receiving community services because of age, health or disability; or
- living in sheltered or residential care home; or
- being unable for any other reason to protect themselves against significant harm or exploitation.

## 5. **POLICY RESPONSIBILITIES**

5.1 Designated lead responsibility for safeguarding at Verto Education London lies with the Student Success Manager for Residential Life, who is tasked with ensuring that the importance of safeguarding vulnerable groups within Verto is understood. The Programme Director deputises for the Student Success Manager for Residential Life in their absence.

5.2 All areas of Verto Education London with regular or occasional contact with vulnerable groups are obligated to ensure that appropriate arrangements are in place to operationalise this policy, and that these are regularly reviewed and updated to ensure the content of this policy is continually reflected upon, delivered and maintained. These areas of Verto must ensure that all staff in their area are made aware of this policy, and that they receive appropriate training.

5.3 Recruiting/line managers are responsible for:

- Ensuring that they follow the relevant recruitment and selection policy and procedure, including clarifying where a role requires a DBS check and liaising with the Program Director and / or the Program Operations Coordinator to ensure that appropriate checks are in place.
- Informing the Program Director where job roles change to include contact with vulnerable groups and to discuss new requirements for appropriate record checks.

5.4 The Program Operations Coordinator is responsible for liaising with managers to ensure that DBS checks are carried out as required for certain roles, and for ensuring that a central record is kept of all such completed checks.

## 6. **WORKING WITH VULNERABLE GROUPS**

6.1 Examples of areas around the centre with roles that this policy may relate to include (this is not an exhaustive list):

- Those teaching students under the age of 18.
- Those working with disabled students and staff
- Those working with students and staff with mental health issues
- Those responsible for organising and supporting visits to the campus

- Student Success Advisers
  - Any staff who work with vulnerable groups, either via teaching activity, or through other forms of engagement
- 6.2 Verto Education is committed to safeguarding and promoting the welfare of vulnerable groups, in response to specific legislation, and as part of our common law duty of care. This includes taking all reasonable measures to:
- Ensure that Verto's environment is safe, secure and inclusive of those from vulnerable groups.
  - Ensure that staff, faculty and students are familiar with the Verto Code of Responsibility, which sets out guidelines for the whole Verto community regarding expected behaviour.
  - Ensure that recruitment processes (outlined below) are followed, in order to ensure that all job roles with known, direct contact with vulnerable groups have had the appropriate background checks conducted.
  - Ensure that anyone suffering from or who has suffered significant harm is identified and responded to appropriately and quickly.
  - Ensure that all concerns are taken seriously, and responded to appropriately and quickly. All groups should be respected and have their views heard and considered irrespective of age or other presentation.
- 6.3 In order to safeguard oneself from raising the concerns of others about your behaviour towards vulnerable groups, it is good practice to be vigilant that interactions are open and transparent at all times. To this end, staff should:
- In accordance with the Verto Code of Responsibility, treat all people with dignity and respect, and promote within Verto an inclusive and participatory working and social environment in which we encourage, support and behave appropriately to one another.
  - Be mindful of interaction which could be considered as favouritism, either directly or indirectly;
  - Avoid putting themselves in a position where they might find themselves alone with a vulnerable individual unnecessarily.
  - Refrain from using personal contact details such as mobile numbers and email addresses, or engaging in non-work related contact via social networking sites (e.g. TikTok, Instagram, Twitter, Snapchat etc.). Relationships should be kept on a professional, not personal basis. It should not be necessary to contact vulnerable groups outside of Verto business;
  - Exercise care in their use of language, and in their behaviour, and avoid comments or actions which could be interpreted as having a sexual connotation, even in jest;

- Report any concerns, suspicions or allegations regarding the welfare of a child, young person immediately or vulnerable adult to the appropriate officer (see 8 below).

## **7. RECRUITMENT PROCESSES**

7.1 Verto's recruitment processes ensure that all job roles with known, direct contact with vulnerable groups have had the appropriate background checks conducted. Verto will take all appropriate steps to ensure that unsuitable people are prevented from working with vulnerable groups. Separate procedures exist for the purposes of undertaking DBS checks and can be found in the Verto Education Staff Handbook.

7.2 Copies of completed DBS checks are not retained on employee files; instead, the employee will be required to bring their original certificate to HR so that the key information can be recorded and any actions taken as appropriate. Further details may be found in Verto's DBS Policy Statement, which forms part of the Staff Handbook.

## **7.3 SAFEGUARDING ARRANGEMENTS WITH PARTNER ORGANISATIONS**

Verto will:

- Confirm the safeguarding policies and procedures are in place within the hosting placements. This will include information regarding the types of criminal record checks that have been carried out.
- Confirm in writing details of expectations of any hosts
- Information about the placements will be shared with the school including confirmation that local police checks, self-declaration forms code of conduct, house rules, structure, and suitability of sleeping arrangements.
- Will comply with relevant legislation in partnering countries when planning and executing a mobility.
- Send a safeguarding checklist to all partners. This will need to be completed if any participants under the age of 18 are part of the project activity.

7.4 When working with partnership organisations the following will be confirmed prior to the placement:

### **7.4.1 Planning**

- An up-to-date safeguarding and child protection policy. The policy must be signed by the most senior person in the organisation and be written clearly, accessible, and available to all stakeholders including students.
- The Data Protection Policy of the organisation
- An agreement to adhere to the Safeguarding Vulnerable Groups Act 2006
- The current Health and Safety Policy of the organisation
- A named visit leader who will be the designated trained safeguarding lead
- A code of conduct
- A clear mechanism for reporting any safeguarding concerns
- Procedure for organising off-site educational visits including that risk assessments have been completed and the local authority notified of the visit.

- Suitable insurance is in place

#### 7.4.2 Staffing

- All adults (staff or otherwise) engaged in regulated activity with under 18-year-olds as part of the placement have undergone an enhanced disclosure and barring service (DBS) check.
- Safe recruitment procedures are in place to carefully screen applicants (staff and volunteers) and to help prevent unsuitable individuals working with students including children.
- Clear whistleblowing procedures are suitably referenced in staff training and codes of conduct.
- There is appropriate support for staff.
- Staff are aware of any known health conditions the students may have including any medication.
- All staff have emergency contact details.
- Ratios of staff to participants have been agreed with consideration given to the age of the participants, whether any have disabilities or additional needs, the nature of the visit and activities, and the experience of the participants
- All accompanying staff members have been informed of their roles and responsibilities during the visit.

#### 7.4.3 Students with disabilities

- All planning and exchanges take into consideration any young person with a disability (as defined by the Equality Act 2010).
- Information has been provided to parents/guardians/carers about how welfare concerns or instances of abuse can be reported and how these will be managed.
- Parents/guardians/carers of students involved in the visit have full details of where their child is staying, a full itinerary of the visit and emergency contact numbers.

#### 7.4.4 Reporting of safeguarding concerns

- Specific guidance has been provided for students and especially children on how to report any risks or situations which make them feel uncomfortable. This to include who is the Designated Safeguarding Lead.
- Students are aware of a 24-hour contact number and have been fully briefed as to procedures should problems arise.
- Staff agree to respond to any concerns immediately and to be available to answer any messages or calls straight away.
- There is a process for recording all child protection incidents/allegations/concerns. This will also include those that do not meet the threshold requiring the safeguarding lead to be alerted.
- Any child protection or other safeguarding incident should be communicated to Verto Designated Safeguarding Lead

- 7.5 **SAFEGUARDING ARRANGEMENTS WITH THIRD PARTY PROVIDERS** Where Verto has agreements in place with third party providers that may involve working with vulnerable groups or individuals, such as in the provision of student housing, those agreements will include a shared understanding among all parties of the required safeguarding arrangements (such as DBS checks).
- 7.6 Such understanding applies under this policy to agreements explicitly made between Verto Education and the third party. Individuals who arrange a service related to a vulnerable group or individual with a provider outside such agreements are responsible for checking themselves the safeguarding arrangements that are in place.
- 8. SAFEGUARDING RESPONSIBILITIES UNDER THE PREVENT DUTY**
- 8.1 Verto is obligated to engage with the Government's Prevent strategy and provide appropriate training and guidance for members of staff whose role involves safeguarding students.
- 8.2 Any behaviour which suggests that an individual might be at risk of being drawn into terrorism must be reported in line with the Prevent duty SOP [\[link\]](#), so that the matter can be investigated and any appropriate support can be put in place.
- 8.3 As with other types of safeguarding, the threshold for reporting to our designated officer for consideration through our documented processes is low, because Prevent is concerned with early intervention to safeguard and divert people away from the risk they face.
- 9. RAISING CONCERNS**
- 9.1 From a moral and social viewpoint, safeguarding is everyone's responsibility at all times. All staff have a responsibility to raise any concerns they may have for the safety and wellbeing of vulnerable groups or individuals who are in contact with Verto. These could arise in a variety of ways in a range of situations.
- 9.2 It is not always easy to recognise a situation that compromises a vulnerable group's safety; however, each person has a responsibility to act if they have any concerns about a child, young person or vulnerable adult, and such concerns are to be taken in good faith. Those concerns may also relate to issues of vulnerability that arise outside Verto or Verto activities.
- 9.3 The person aware of these suspicions or allegations must contact the Verto safeguarding lead or their nominated contact immediately for guidance on what action must be taken. All discussions will be treated with discretion at all times.
- 9.4 Verto's designated safeguarding lead has overall responsibility for investigating allegations and other disclosure information, in conjunction with relevant external agencies.
- 9.5 Verto London's Whistleblowing Policy [\[link\]](#) provides a procedure by which an individual who is contractually connected to Verto can disclose information in the public interest which is related to suspected serious wrongdoing or dangers



related to the running of the Verto programs or to the work-related activities of staff.

We are committed to reviewing our policy and good practice annually.

This policy was last reviewed on: ...26/09/2025.....(date)

Signed:

A handwritten signature in black ink, appearing to read 'Angela Ellermeier', with a long horizontal flourish extending to the right.

Angela Ellermeier, London Program Director

Date: .....26/09/2025.....