

ONVU LEARNING SAFEGUARDING POLICY

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Preface

ONVU Technologies [OVT] and its subsidiaries and affiliates deliver video and data-led technology solutions through annual investment in R&D, talent acquisition and partnerships, to enable our global partners and customers to make informed business choices across the surveillance, education, and retail sectors.

For simplicity throughout this policy, 'we' and 'us' means ONVU Technologies and its subsidiaries and affiliates.

1.0 Scope

- 1.1 *Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child. ([KCSIE, 2021](#))*

- 1.2 ONVU Learning bases its safeguarding protocols, procedures and policy on the statement above, taken from the statutory guidance on safeguarding children in schools in England.

2.0 Purpose

- 2.1 This policy is intended for use by ONVU learning (and ONVU Technologies) personnel, partner/client staff and any other stakeholder involved in the deployment and use of ONVU Learning products and services.
- 2.2 This policy will be shared with customers.
- 2.3 This policy refers to statutory guidance as it exists in England. However, this should be treated as an indication of intent and a benchmark of our approach in any territory.

3.0 Responsibility

- 3.1 Safeguarding children is a broad reaching, often sensitive and complex matter. In England, the statutory guidance (Keeping children safe in education, 2021 [KCSIE]) details the latest approaches considered to be a mandatory baseline for those with responsibility (everyone) for children's welfare to follow. KCSIE interacts with other statutory guidance and regulations in schools in order to promote children's welfare and protect their well-being.
- 3.2 ONVU Learning believes in the right and entitlement of every child to learn in happy, safe and effective learning environments. While ONVU Learning (and its staff) do not and will not participate in regulated activity, ONVU Learning will always pay due regard to overarching safeguarding guidance (such as KCSIE in England) and partner/client schools'/institutions' safeguarding policies and procedures.
- 3.3 ONVU Learning has obligations under data protection law and under contracts with ONVU Learning customers that apply to (but not limited to) the processing of images and footage of children. ONVU Learning takes these responsibilities very seriously. Protecting the rights and the privacy of customers is at the heart of our approach. When dealing with images or footage of children, our security and data protection policies will be consulted and adhered to strictly. ONVU Learning uses data protection and privacy policies and procedures to govern and manage our use of data derived from our products and services.
- 3.4 ONVU Learning will ensure that its associated policies for managing the processing of video and audio footage resulting from our product's use complies with the latest territorial requirements.

- 3.5 We will work with customers to ensure that they understand their responsibilities with regards use of data associated with our products and services. Customers' staff must read and understand our 'onboarding' documentation.

4.0 General

- 4.1 As a matter of good practice, ONVU Learning seeks to minimise the risk of any harm that could be caused to children through provision of ONVU Learning services.

- 4.2 The following steps must be followed:

- a. ONVU Learning will maintain a record of confirmation from customers that the customer's own safeguarding and data protection policies and procedures are fully compliant with requisite regulations and/or legislation. ONVU Learning expects that customers fulfil their responsibilities with regards safeguarding.
- b. All ONVU Learning personnel (including contractors) who access, or who have the ability to access, images or footage of children must have undergone relevant DBS and barred list checks (or local equivalent). The highest level of check for which a role is eligible will be obtained.
- c. Images or footage of children must not be accessed by ONVU Learning personnel unless necessary as a legitimate part of an individual's job role e.g. to undertake pre-agreed (with the customer) maintenance to the platform, address or check a known performance matter or for a purpose agreed by the customer.
- d. ONVU Learning personnel who may be in a position as described by 4.2.c will have undertaken Level 1 safeguarding training as a minimum prior to commencement of their role. The purpose of this training is to provide our staff with a basic degree of understanding about safeguarding children for their protection and should they be in a position to interact with the provisions stated in 4.2.f.
- e. Any member of staff acting on behalf of the customer must be in a position to legitimately grant permissions associated with 4.2.c.
- f. ONVU Learning will undertake random checks on its staff's actions while undertaking their role as per 4.2.c. The purpose of such checks are to ensure that children and adults are protected from potential harm, allegations and disciplinary action.

5.0 Managing Concerns

- 5.1 If in the course of their work, a member of ONVU Learning staff identifies a matter that they suspect concerns safeguarding children in a customer's school/institution then this must be immediately reported to:
- a. The VP Commercial, ONVU Learning who will then, by telephone and email;

- b. notify the school's designated safeguarding leader unless the concern pertains to them, in which case the headteacher will be notified, or if the concern pertains to the school's headteacher, they must report the matter to the school's chair of governing body/headteacher's line manager.
 - i. Schools' local safeguarding policy and procedures are typically published on their websites. If in doubt, ONVU Learning personnel will consult the school's safeguarding policy and procedures (as published).
 - ii. If the school's safeguarding arrangements are deemed inadequate (for example, following a recent inspection of standards) then consideration will be given as to whether the relevant authority is informed of the issue by ONVU Learning instead of the customer.
 - c. At all times, the ONVU Learning will primarily pay due regard to safeguarding children guidance relating to that territory.
 - i. Safeguarding issues include (but are not limited to) events or circumstances that endanger or are likely to endanger a child, conduct of a sexual or violent nature involving a child, conduct involving sexual or violent material and a child or any use of images or footage of children for a purpose other than the purpose for which they have been collected.
 - ii. KCSIE, 2021¹, highlights that safeguarding concerns may arise as a consequence of a series of 'low level concerns'. Such low level concerns may be captured by our product. Customers' staff should be mindful of this.
- 5.2 The VP Commercial, ONVU Learning shall be responsible for determining other parties (including, if lawful and appropriate) to be informed. Communications with all third parties must be initiated by the The VP Commercial, ONVU Learning or with their written consent.
- 5.3 It will remain the primary responsibility of the school/institution in which our products and services are used to manage a safeguarding concern identified to exist within that institution and/or relating to staff working for that institution (in any capacity). ONVU Learning will always cooperate to the extent of our ability and in children's best interests.
- 5.4 If a customer identifies a safeguarding concern about a member of ONVU Learning staff then they should follow their local procedures and protocols for managing that concern. The customer is asked to notify the VP Commercial, ONVU Learning as soon as is possible so that ONVU Learning can cooperate with any actions required, including internal disciplinary actions.
- 5.5 Where it does not interfere with another process, the concern will be investigated by ONVU Learning within 28 days (unless

prohibited/delayed due to an external process e.g. police investigation).

- 5.6 The school associated with the concern will be notified once the internal investigation is concluded (unless the concern escalates to a multiple stakeholder action (e.g. led by the local authority designated officer) and will be informed of the outcome (only) for the purpose of the school completing their own records.
- 5.7 If ONVU Learning identifies a matter that could constitute a safeguarding concern about a member of our staff, we will notify the customer and take appropriate actions to ensure children are protected from the risk of harm.

6.0 Review

- 6.1 This policy will be reviewed annually. The policy may be adjusted:
 - 6.1.1 in the event of any local or national change to legislation, regulation or sector guidance;
 - 6.1.2 Because another ONVU Learning (or Company) policy requires an associated alteration.