



GREEN VALLEY ACADEMY

Safeguarding and Prevent Policy, Code of Conduct and Implementation Framework

Approved: October 2026

DOCUMENT CONTROL

Reference	GVA-27 (This framework supports and operationalises the Green Valley Academy Safeguarding and Prevent Policy (GVA-06) and supersedes any previous version of the operational Safeguarding and Prevent Framework; incorporates the Code of Conduct and the Implementation Framework in a single instrument)
Policy owner	Designated Safeguarding Lead safeguarding@greenvalleyacademy.co.uk
Approved by	Academic Board—5 October 2026
Effective from	5 October 2026
Next review	August 2027, and immediately upon any change to statutory guidance
Applies to	All staff, members of the Board of Directors, students, volunteers, contractors and visitors, on campus, online, and in every activity carried out in the Academy's name
Linked documents	Safeguarding and Prevent Reporting Form (Form 2); Sexual Misconduct, Sexual Harassment and Staff–Student Relationships Policy; Mental Health and Wellbeing Referral Policy; Event and Guest Speaker Request Form (Form 6); Modern Slavery Policy; IT, Data Protection and Data Security Policy

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1. POLICY STATEMENT, PURPOSE AND SCOPE

- 1.1** Green Valley Academy regards the safety, welfare and dignity of every student and member of staff as its first institutional duty, taking precedence over every commercial, reputational or operational consideration. The Academy will therefore maintain, resource and enforce arrangements which protect children, adults at risk and the wider student community from abuse, neglect, exploitation and radicalisation; it will act on every concern, however apparently minor, on the principle that it is always better to raise a concern that proves unfounded than to remain silent about one that proves real; and it will hold every adult who works with its students to the Code of Conduct set out in Section 5 of this policy, without exception for seniority, length of service or personal standing.
- 1.2** The purpose of this policy is fourfold: to define the Academy's safeguarding and Prevent duties and the legal framework from which they derive; to establish clear roles, reporting routes and referral procedures so that every member of the community knows exactly what to do, and within what timescale, when a concern arises; to prescribe the standards of adult behaviour which prevent harm from occurring in the first place; and to set out, in the Implementation Framework at Section 12, the recurring calendar of training, checks, audits and reports through which the Board of Directors satisfies itself that these arrangements operate in practice and not merely on paper.
- 1.3** This policy applies to all staff, members of the Board of Directors, volunteers, contractors and visitors, and to all students, in every setting in which the Academy operates: the campus at The Atrium, Burrs Place, Luton; online teaching, communication and social media connected with the Academy; open days, outreach activity and recruitment events; placements, trips and external visits; and any other activity carried out in the Academy's name. Although the majority of the Academy's students are adults, the Academy will from time to time enroll students under the age of eighteen at entry to the Foundation Year, will host under-eighteens at open days and outreach events, and serves adult students whose circumstances — including disability, mental ill-health, caring responsibilities, financial hardship and coercive personal relationships — may place them at risk; safeguarding is accordingly treated as a duty owed to the whole community and discharged by the whole community.

2. LEGAL AND STATUTORY FRAMEWORK

- 2.1** This policy is written to comply with, and shall at all times be read consistently with, the current versions of the following instruments: the Children Acts 1989 and 2004; the Care Act 2014, including its statutory guidance on adult safeguarding and the six principles of empowerment, prevention, proportionality, protection, partnership and accountability; the Counter-Terrorism and Security Act 2015 and the Prevent duty guidance applicable to higher education providers; the Safeguarding Vulnerable Groups Act 2006 and the arrangements of the Disclosure and Barring Service; the Sexual Offences Act 2003, including the provisions concerning abuse of positions of trust; the Modern Slavery Act 2015; and the UK General Data Protection Regulation and Data Protection Act 2018 insofar as they govern safeguarding records and the sharing of information.

- 2.2** The Academy will additionally apply the principles of Keeping Children Safe in Education and Working Together to Safeguard Children as representing best practice in respect of any student, applicant or visitor under the age of eighteen, notwithstanding that the Academy is not a school and those instruments do not bind it directly. Where statutory guidance changes between annual reviews of this policy, the Designated Safeguarding Lead shall alter operational practice immediately upon the change taking effect and shall bring a written addendum to the next meeting of the Safeguarding and Prevent Committee; in any interim period, the standard affording the greater protection shall be applied.

3. DEFINITIONS AND CATEGORIES OF HARM

- 3.1** For the purposes of this policy, safeguarding means protecting a person's health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect. A child means any person under the age of eighteen, whether an enrolled student, an applicant, a family member of a student, or a visitor. An adult at risk means a person aged eighteen or over who has needs for care and support (whether or not those needs are being met), who is experiencing, or is at risk of, abuse or neglect, and who, as a result of those needs, is unable to protect himself or herself against the abuse or neglect or the risk of it.
- 3.2** Abuse takes many forms, and staff shall be trained to recognise all of the following categories: physical abuse; emotional and psychological abuse, including intimidation, humiliation and coercive control; sexual abuse, sexual exploitation and sexual harassment, which are further governed by the Sexual Misconduct, Sexual Harassment and Staff–Student Relationships Policy; neglect and acts of omission; financial and material abuse, including the control or misappropriation of a person's money, benefits or possessions; domestic abuse in all its forms; so-called honour-based abuse, forced marriage and female genital mutilation; modern slavery and human trafficking, further governed by the Modern Slavery Policy; online and technology-facilitated abuse, including grooming, sextortion and the non-consensual sharing of intimate images; self-neglect; self-harm and suicidal ideation, which additionally engage the Mental Health and Wellbeing Referral Policy; and radicalisation towards terrorism or violent extremism, which engages the Prevent arrangements at Section 8.
- 3.3** Staff shall understand, and shall be reminded at every training cycle, that abuse can occur in any setting and can be perpetrated by any person, including family members, intimate partners, other students, strangers, and persons in positions of trust within the Academy itself; that victims frequently do not recognise or disclose their own abuse, and may actively deny it; and that it is never the role of any member of staff to determine whether abuse has in fact occurred, that determination belonging to the statutory agencies. The duty of every member of staff is confined to three actions, each of which is mandatory: to notice, to record, and to report in accordance with Section 6.

4. SAFEGUARDING ROLES, RESPONSIBILITIES AND CONTACTS

- 4.1** Green Valley Academy shall appoint a designated Safeguarding Lead and a suitably trained Deputy Safeguarding Lead. The current postholders will be identified in the Academy's Role and Designation Schedule. The Safeguarding Lead will have sufficient authority, training, time and access to senior management to discharge the role effectively. The DSL holds lead responsibility for all safeguarding and Prevent matters within the Academy, including the receipt and triage of every concern, the making of every external referral, the maintenance of the Safeguarding Register, the oversight of safeguarding training, and the provision of advice and support to staff. The DSL shall hold advanced designated-lead training, renewed at intervals of no more than two years and supplemented by annual updates, and shall be released from other duties to whatever extent a live safeguarding matter requires. The DSL's authority in an individual case may not be overridden by any member of staff, including the Principal; a disagreement about the handling of a case shall be escalated to the safeguarding link governor and recorded, but shall never delay a referral the DSL judges necessary.
- 4.2** The Deputy Designated Safeguarding Lead (DDSL) is trained to the same standard as the DSL, who shall exercise the full authority of the DSL during any absence, and whose contact details shall be published alongside the DSL's at all times. The Prevent Lead is the PAT Team Leader or a member of the PAT team in case a PAT Team lead has not been appointed, who owns the Prevent risk assessment and action plan, coordinates Prevent training, conducts the assessment of external speakers and events under Section 8, and acts as the Academy's point of liaison with the local authority Prevent team and the Channel panel. The Principal is responsible for the resourcing of these arrangements, for the handling of allegations against staff under Section 10, and for escalation to the Board of Directors; and the Board shall appoint from among its independent members a safeguarding link governor
- 4.3** The Academy shall maintain, display on campus, publish in the Student Handbook, and review at least termly, a contact card recording: the names, locations and contact details of the DSL and DDSL; the safeguarding mailbox (safeguarding@greenvalleyacademy.co.uk), access to which shall be restricted to the DSL and DDSL alone; the emergency services; and the current external safeguarding contacts, namely the Luton multi-agency safeguarding hub for children, the Luton adult safeguarding service, the local authority designated officer (LADO), the local Prevent team and the police. Details for contact. External safeguarding contacts (verified September 2026): Children's Multi-Agency Safeguarding Hub (MASH), Luton: 01582 547653 · mash@luton.gov.uk Adult safeguarding (Adult MASH), Luton Borough Council: 01582 547730 · adultsafeguarding@luton.gov.uk Out-of-hours Emergency Duty Team: 0300 300 8123 Local Authority Designated Officer (LADO): 01582 548069 · lado@luton.gov.uk Prevent, Bedfordshire Police: prevent@bedfordshire.pnn.police.uk · Police Prevent Advice Line 0800 011 3764 Anti-Terrorist Hotline: 0800 789 321 Police: 999 in an emergency · 101 non-emergency · Crimestoppers (anonymous) 0800 555 111

No student or member of staff should ever need to search for the means of reporting a concern.

5. CODE OF CONDUCT FOR STAFF AND VOLUNTEERS

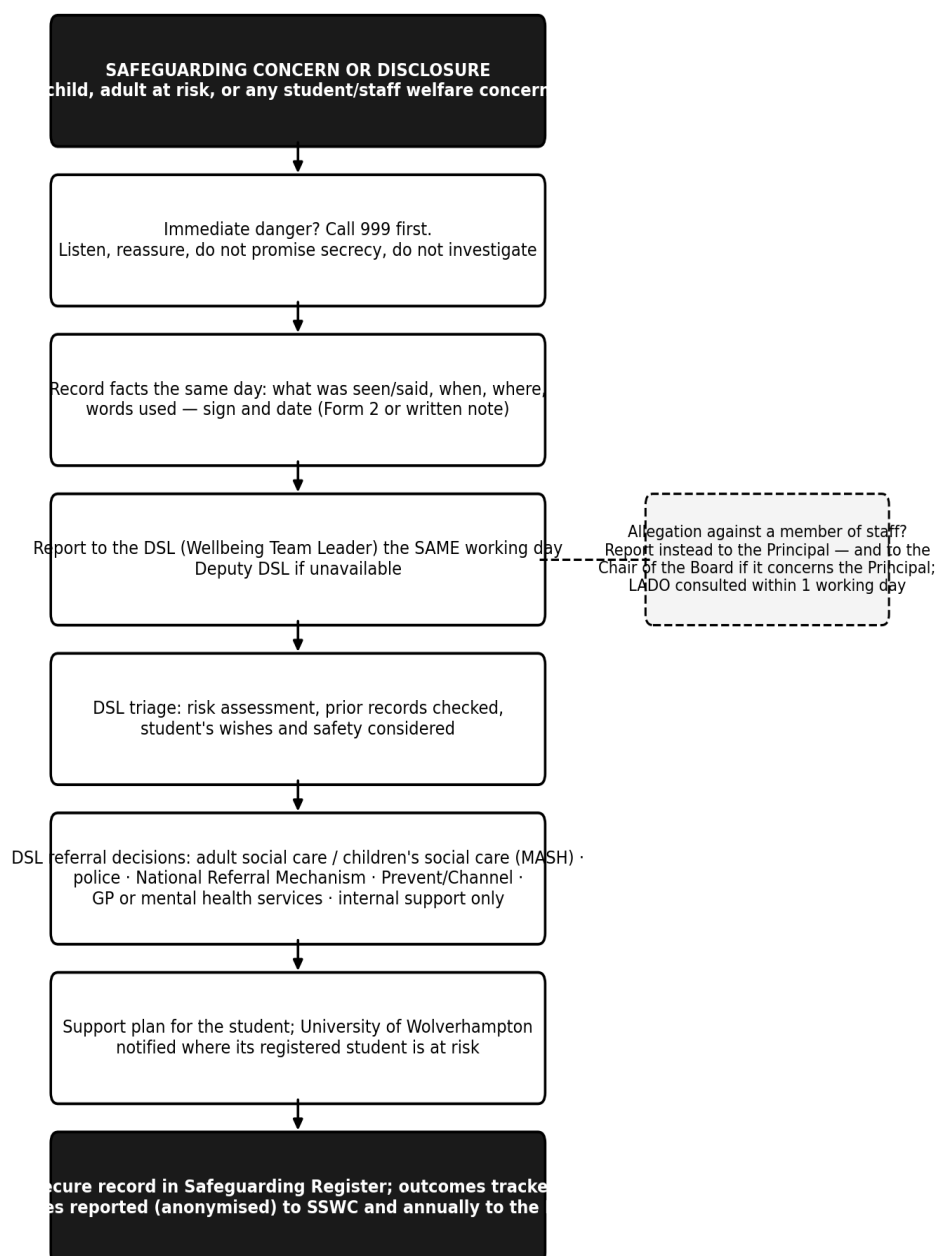
- 5.1** Every member of staff, every member of the Board of Directors and every volunteer shall receive this Code at induction, shall confirm acceptance of it in writing before commencing any student-facing duties, and shall reaffirm it at each annual safeguarding training. The Code exists both to protect students from harm and to protect staff from misplaced suspicion: an adult who observes these standards conscientiously will rarely find their conduct open to misinterpretation. A breach of this Code constitutes misconduct; a serious or deliberate breach constitutes gross misconduct and may additionally result in referral to the LADO, to the police, to the Disclosure and Barring Service, and to any relevant professional regulator.
- 5.2** In all dealings with students, children and adults at risk, staff shall: treat every person with dignity, respect and patience, and challenge unacceptable behavior by others whenever they witness it; conduct individual meetings with students in visible or open settings wherever practicable, keeping doors open or using rooms with vision panels, and ensuring that activities involving persons under eighteen are attended by more than one adult or conducted within sight of others; respect personal privacy at all times; avoid all physical contact with students except that which is openly necessary for first aid, safety or emergency assistance, and record any such contact promptly; and exercise particular care when teaching or discussing sensitive material, ensuring that feedback is constructive and never degrading, sexualized, mocking or frightening.
- 5.3** Staff shall further observe the following absolute prohibitions, the breach of any of which is gross misconduct: no member of staff shall form, seek or continue an intimate or romantic relationship with any student for whom they hold professional responsibility, as more fully provided in Part B of the Sexual Misconduct, Sexual Harassment and Staff–Student Relationships Policy; no member of staff shall abuse the position of trust which every member of staff holds in relation to students under eighteen, such abuse being additionally a criminal offence; no member of staff shall communicate with current students through personal social-media accounts, personal messaging services or personal contact details, all communication being conducted through Academy-approved channels; no member of staff shall give to, or accept from, any student a gift of more than trivial value, and any gift beyond the trivial shall be declared under the Conflicts of Interest Policy; no member of staff shall photograph or record any student without consent and a legitimate institutional purpose; and no member of staff shall ever promise confidentiality to a person disclosing a safeguarding concern, it being fundamental that such information must be passed to the DSL.

6. RECOGNISING, RECEIVING AND REPORTING CONCERNS

- 6.1** Staff shall remain alert to the indicators of harm, which include, without limitation: unexplained or repeated injuries, or injuries inconsistent with the explanation offered; marked changes in behaviors, appearance, attendance or engagement; disclosure by the person concerned or by a third party; fearfulness, hypervigilance or visible anxiety in the presence of a particular individual; evidence that another person controls the student's money, identity documents, communications or movements; age-inappropriate sexualised language or behaviour; expressions of hopelessness, worthlessness or

suicidal thinking; possession of unexplained money or gifts; and the expression of support for violent extremism or the dehumanisation of others. The presence of an indicator is not proof of abuse, and its absence is not proof of safety; staff are required to act on reasonable concern, not on certainty.

- 6.2** A member of staff receiving a disclosure shall: listen calmly and attentively, allowing the person to speak in their own words and at their own pace; take what is said seriously, offering reassurance that the person has done the right thing in speaking; refrain from investigating, from asking leading questions, and from expressing shock, disbelief or judgement; explain honestly that the information cannot be kept secret and must be shared with the Designated Safeguarding Lead, and explain what will happen next; and make a written record the same day, using the person's own words so far as possible, recording what was seen and said, the date, time and place, the persons present, and any visible injuries, and signing and dating that record. The record shall be factual and free of the member of staff's own interpretation or opinion, save where opinion is clearly identified as such.
- 6.3** Every concern, disclosure or allegation, from whatever source and however received, shall be reported to the DSL the same working day, and immediately where the concern is urgent; where the DSL and DDSL are both unavailable and the matter cannot wait, the member of staff shall contact the statutory services directly and inform the DSL as soon as possible thereafter. Where any person is in immediate danger, staff shall telephone 999 before taking any other step. Reports may be made in person, through the safeguarding mailbox, or through the online Safeguarding and Prevent Reporting Form (Form 2); the route chosen shall never delay the report. The full response process is set out in Figure 1.



Never promise confidentiality; share only on a need-to-know basis. The DSL decides referrals — staff never refer independently except in emergencies.

Figure 1: Safeguarding response and referral process

7. REFERRAL, INFORMATION SHARING AND RECORD KEEPING

- 7.1** Upon receipt of a concern the DSL shall conduct a triage the same working day, reviewing any previous records held in the Safeguarding Register, assessing the seriousness and immediacy of the risk, and considering the wishes, feelings and safety of the person concerned. The DSL shall then determine the appropriate response, which may comprise one or more of the following: referral to children's social care through the Luton multi-agency safeguarding hub, where the person is under eighteen; referral to adult social care, where the person is an adult at risk; report to the police, where a criminal offence may have been committed or any person is in danger; referral into the

National Referral Mechanism, where modern slavery or trafficking is indicated; referral to the Channel program through the local authority, where radicalisation is indicated, in accordance with Section 8; referral to health services, including under the Mental Health and Wellbeing Referral Policy; or the provision of internal support and monitoring, where the threshold for statutory referral is not met. Where the DSL determines that no external referral is required, the reasons for that determination shall be recorded in full.

- 7.2** Consent to referral shall be sought from adults wherever it is safe and practicable to do so, and the Academy shall work in partnership with the person concerned in accordance with the Care Act principles; consent may however be overridden, and information shared without it, where the person lacks the relevant capacity, where other persons are or may be at risk, where a serious crime is involved, or where seeking consent would itself increase risk, and in every such case the justification shall be recorded. Information shall be shared on a strict need-to-know basis, accurately, securely and proportionately, in accordance with the IT, Data Protection and Data Security Policy; and the Academy shall inform the University of Wolverhampton, through the agreed partnership route, wherever one of its registered students is judged to be at significant risk, sharing no more information than that purpose requires.
- 7.3** All safeguarding records — concerns, triage decisions, referrals, correspondence, case notes and outcomes — shall be held in the confidential Safeguarding Register, stored separately from academic and other records, with access confined to the DSL and DDSL. Records shall be retained in accordance with the retention schedule in the IT, Data Protection and Data Security Policy, and in the case of matters concerning a person under eighteen shall in any event be retained at least until the person's twenty-fifth birthday. Where a student under eighteen transfers to another institution, the safeguarding file shall be transferred securely to that institution's safeguarding lead and a confirmation of receipt obtained and retained.

8. THE PREVENT DUTY

- 8.1** The Academy is committed to discharging the Prevent duty in a manner that is proportionate, risk-based and respectful of academic freedom and of lawful freedom of expression, recognising that the purpose of Prevent is to safeguard individuals from being drawn into terrorism and that the open discussion of controversial ideas within the law is a proper function of higher education, not a risk to be eliminated. The Prevent Lead shall maintain a written Prevent risk assessment and action plan addressing, as a minimum: the profile of the Academy's community and locality; the use of Academy premises and IT; external speakers and events; partnerships and lettings; online delivery; and staff capability. The risk assessment shall be approved by the Board of Directors annually and reviewed following any relevant incident or change in the national threat picture or statutory guidance.
- 8.2** The operational Prevent arrangements are as follows: all staff shall complete Prevent awareness training at induction and annually thereafter, and the Prevent Lead and DSL shall complete the role-specific training appropriate to their functions; every proposed event involving an external speaker shall be submitted through the Event and Guest Speaker Request Form (Form 6) at least four weeks in advance and assessed under the

procedure incorporated in that form, with conditions such as chairing, balance of platform or format changes preferred to refusal wherever the expression concerned is lawful; the Academy's IT systems shall operate web filtering and monitoring that is proportionate, transparent to users and compliant with the IT, Data Protection and Data Security Policy; and prayer and quiet space at The Atrium shall be managed inclusively, with any recurring external leadership of religious activity subject to the same speaker assessment. Concerns that a person may be drawn into terrorism shall be reported and handled in accordance with the process at Figure 2, and no member of staff shall attempt to investigate or to confront the person concerned.

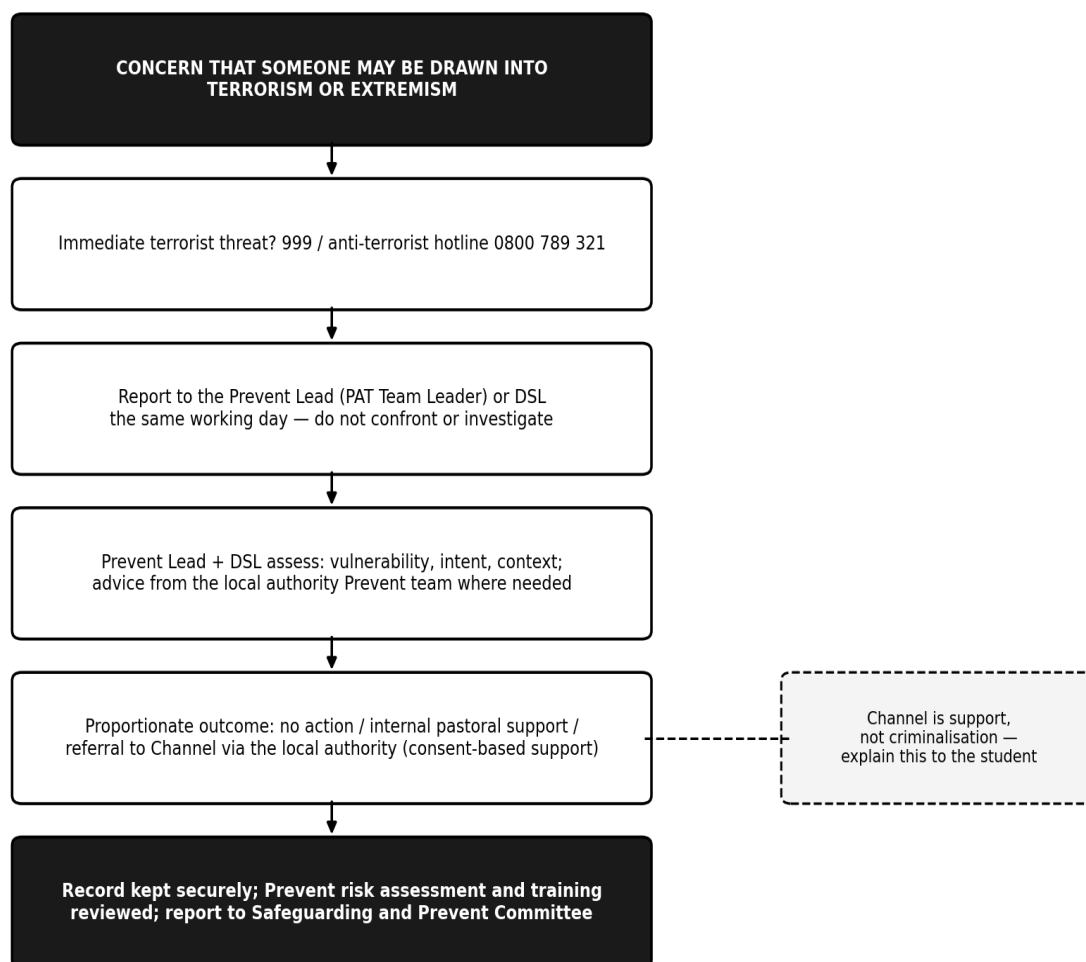


Figure 2: Prevent concern and Channel referral process

9. SAFER RECRUITMENT AND THE SINGLE CENTRAL REGISTER

- 9.1** The Academy shall apply safer-recruitment principles to every appointment, whether of staff, volunteers, agency workers or contractors whose roles bring them into contact with students. These principles comprise: verification of identity and of the right to work in the United Kingdom; a full employment history, with any gaps explored and the explanation recorded at interview; a minimum of two references, one of which shall be from the most recent employer, obtained directly from the referee and verified; an enhanced Disclosure

and Barring Service check, including a barred-list check wherever the role constitutes regulated activity, completed before the individual undertakes unsupervised contact with students under eighteen or adults at risk; equivalent overseas criminal-record checks where the individual has lived or worked abroad; and offer letters that are expressly conditional upon the satisfactory completion of all of the foregoing.

- 9.2** The Academic Registrar and Admissions Officer shall maintain a single central register recording, for every member of staff and volunteer, the date and outcome of each check described in clause 9.1. The register shall be inspected by the DSL each term and by the safeguarding link governor annually, and any deficiency shall be remedied before the individual concerned continues in student-facing duties. Agencies supplying workers shall provide written confirmation of equivalent checks before deployment, and the Academy shall verify the identity of each agency's worker on first attendance.

10. ALLEGATIONS AGAINST STAFF AND VOLUNTEERS

- 10.1** An allegation that a member of staff, a volunteer or a contractor has behaved in a way that has harmed a student, child or adult at risk, may have committed a criminal offence against one, or has behaved in a way that indicates they may pose a risk of harm, shall be reported immediately to the Principal, and shall never be investigated first by colleagues, line managers or the person's own team. The Principal, it shall be reported to the Chair of the Board of Directors, whose contact details are published for this purpose. The Principal (or Chair) shall consult the local authority designated officer within one working day wherever the allegation concerns a person under eighteen and shall follow the LADO's advice as to the sequencing of any internal process alongside any statutory investigation.
- 10.2** Pending the outcome of any investigation, the Principal shall apply precautionary measures that protect students, the individual concerned and the integrity of the process, which may include adjustment of duties, supervision requirements or suspension on full pay; such measures are neutral acts of protection and shall not be treated or described as findings of guilt. Upon conclusion, the Academy shall make a referral to the Disclosure and Barring Service where the statutory conditions for referral are met, and to any relevant professional regulator; shall record the allegation and outcome, including unsubstantiated and unfounded outcomes, confidentially and in accordance with guidance; and shall address any allegation found to have been malicious through the disciplinary or student-disciplinary procedures, while ensuring that the handling of the malicious allegation does not deter genuine reporting.

11. TRAINING

- 11.1** The training obligations under this policy are as follows, and completion shall be recorded centrally and reported termly to the Safeguarding and Prevent Committee: all staff and volunteers shall complete safeguarding and Prevent training at induction and annually thereafter, covering this policy, the categories and indicators of harm, the Code of Conduct, the receipt of disclosures and the reporting routes; the DSL and DDSL shall complete advanced designated-lead training at intervals of no more than two years, together with annual updates and participation in local authority briefings; the Prevent

Lead shall complete Prevent-lead and Channel-awareness training at intervals of no more than two years; the Board of Directors shall receive a governance-level safeguarding and Prevent briefing annually; student-facing teams, including Personal Academic Tutors, the Wellbeing team and registry staff, shall complete an enhanced annual module addressing disclosures, thresholds and recording; and every intake of students shall receive an induction briefing explaining how to raise concerns, how the Academy responds, and the support available.

12. IMPLEMENTATION FRAMEWORK AND ANNUAL CALENDAR

- 12.1** The commitments in this policy shall be delivered through the following recurring calendar, compliance with which shall itself be audited annually: in August, before teaching commences, all checks on the single central register shall be complete, all staff training shall be current, the Prevent risk assessment shall be approved, and the contact card at clause 4.3 shall be verified and republished; in September, every new cohort shall receive its induction briefing, the Safeguarding and Prevent Committee shall hold its first meeting of the year, and the online reporting form shall be tested end to end; each term, the Committee shall review anonymised case data, training completion, register audits and Prevent actions; and each summer the DSL shall conduct a full review of this policy and present the annual safeguarding and Prevent report to the Board of Directors and reports safeguarding activity and assurance through the Safeguarding and Prevent Committee to the Academic Board. Serious or urgent safeguarding matters may be escalated directly to the Chair/Board of Directors where appropriate.

13. GOVERNANCE, MONITORING AND REVIEW

- 13.1** The Safeguarding and Prevent Committee monitors the operation of this policy each term on behalf of the Academic ; the safeguarding link governor provides independent oversight, meeting the DSL at least Board termly and reporting their assurance directly to the Board of Directors; and the DSL's annual report to the Board shall cover, as a minimum, the volume and categories of concerns and referrals (anonymised), response timeliness, training completion, the outcomes of register audits, Prevent activity, allegations against staff, and the lessons applied. This policy, the Code of Conduct and the Implementation Framework shall be reviewed annually by the DSL and approved by the Board of Directors and shall be reviewed immediately upon any change in statutory guidance, any serious incident, or any recommendation arising from an external review or from the University of Wolverhampton.