

SAFEGUARDING POLICY

Document reference: ONVU Technologies Safeguarding Policy

Issue Number: Issue

Issue Date: See section 6.0

Review date: 12 months from approval date (see section 6.0)

Document Owner: VP Commercial ONVU Learning
(responsibility for keeping the document up to date):

Version Control inc. approval status): Via SharePoint

PREFACE

ONVU Technologies AG and its subsidiaries and affiliates (OVT) 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 OVT ; incorporating the brand and product set ONVU Learning sold Worldwide.

1.0 SCOPE

- 1.1 *Safeguarding and promoting the welfare of children is everyone's responsibility. 'Children' includes everyone under the age of 18. 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, 2024](#))*
- 1.2 OVT 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 OVT 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, their staff and any person that may reasonably require it.

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- 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, 2024 [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 OVT believes in the right and entitlement of every child to learn in happy, safe and effective learning environments. While OVT (and its staff) do not and will not participate in regulated activity, OVT 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 OVT has obligations under the applicable data protection law from time to time in force and under contracts with OVT customers that apply to (but not limited to) the processing of images and footage of children. OVT 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. OVT uses data protection and privacy policies and procedures to govern and manage our use of data derived from our products and services.
- 3.4 OVT will ensure that its associated policies for managing the processing of video and audio footage resulting from our product's use complies with the applicable data protection laws and any other applicable territorial requirements from time to time in force.
- 3.5 OVT anticipates that the customer shall be the controller and that OVT shall be the processor in processing any personal data in the provision of its products and services. We will work with customers to ensure that they understand their responsibilities with regards use of personal 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, OVT 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 LTD will maintain a record of confirmation from customers that the customer's own safeguarding and data protection policies and procedures are fully compliant with the requisite data protection laws and any other applicable regulations and/or legislation. ONVU LTD expects that customers fulfil their responsibilities with regards safeguarding.
- b) All ONVU LTD 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 LTD 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 LTD 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 LTD 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 LTD 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 (in the VP Commercial's absence, their responsibility will fall to the ONVU LTD Director of Customer Experience, who chairs major incident management groups)
- b) notify the school's designated safeguarding lead unless the concern pertains to them, in which case the headteacher will be notified, or if the concern pertains to the school's headteacher, the 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 LTD 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 LTD instead of the customer.

- c) At all times, the ONVU LTD 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 lawful purpose for which they have been collected.
 - ii) KCSIE, 2022, 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.
- 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 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 LTD will use its best endeavours to cooperate with any safeguarding concern or investigation, at all times ensuring it is acting in children's best interests.
- 5.4 If a customer identifies a safeguarding concern about a member of ONVU LTD 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 (via +44 (0)207 509 5359) as soon as is possible so that ONVU LTD 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 LTD 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 LTD identifies a matter that could constitute a safeguarding concern about a member of our staff, we will notify the customer immediately 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 and may be amended from time to time in circumstances including:
 - 6.1.1 where there has been a local or national change to legislation, regulation or sector guidance; and
 - 6.1.2 where an update to another ONVU LTD (or Company) policy requires a change to this policy.



Revised on	Version	Description	Approver
21.11.2021	1.0	Document Creation	VP OVL
11.10.2022	2.0	Review and location Change	VP OVL
09.03.2023	Issue	Location update and copywrite year	VP OVL
24.04.2023	Issue	Updated to meet the naming convention as per the document control procedure	VP OVL
04.09.2023	Issue	Updated to match latest KCSIE update	VP OVL
30.08.2024	Issue	Updated to match KCSIE 2024 and acknowledge OVL worldwide (Preface).	VP OVL