

# Success Academies Safeguarding Policy

## Introduction

### Vision and ethos

- Success Academies provides homeschooling support to learners and their families via live lessons, through our online learning platform and bank of accessible learning resources
- Success Academies aims to provide learners with a pleasant and safe online environment where they feel comfortable and empowered to learn

### Key principles

- Success Academies believes that safeguarding is the responsibility of all staff and parents able to access our online learning platform
- Success Academies will ensure that all staff are aware of key safeguarding procedures and are kept up to date with future developments. Success Academies uses WSCC training materials and resources to ensure all staff are aware of key issues and developments. Staff are updated annually on safeguarding protocol.
- Success Academies recognises that anyone who works with a child via our services must understand their responsibility to identify, respond to and report any signs of abuse or neglect.
- Success Academies respects the views and voices of all children in its care;
- Success Academies recognises that all pupils have an equal right to be safe, irrespective of disability, sex, sexual orientation, gender reassignment and race.
- Success Academies adheres to KCSIE documentation and policies

### Relevant legislation and guidance

- Success Academies adheres to the following:
- [Keeping Children Safe in Education](#)
- [The Children Act 1989 and the 2004 amendment](#)
- [Working Together to Safeguard Children \(2018\)](#);
- [Section 175 of the Education Act 2002](#);
- [What to do if you're worried a child is being abused: advice for practitioners](#).

Success Academies agrees to work with relevant third parties, social services and other agencies to ensure that learners are effectively supported and safeguarded.

### Early help

All staff of Success Academies are alerted and aware of the need for early help, including for children who are more vulnerable. All staff will be made aware of any vulnerable children that they work with, in order to be aware of signs for early help.

### Sharing information

Staff are to be made aware that they should never promise confidentiality to a pupil as it might be necessary to share information with others to keep them safe.

Staff note that:

- the Data Protection Act (DPA) 2018 and UK GDPR does not prevent the sharing of information if this is necessary to keep children safe
- concerns about sharing information should not compromise the process of protecting pupils from harm
- if anyone has concerns or questions about sharing information, they should contact the Success Academies designated safeguarding lead (DSL).

General information about DPA and GDPR can be found here:

[The Data Protection Act - GOV.UK](#)

[Guide to the General Data Protection Regulation - GOV.UK](#)

The Department for Education has provided additional guidance on information sharing for safeguarding practitioners. This can be found here: [Information sharing advice for safeguarding practitioners](#)

## Types and Signs of Abuse

Success Academies staff will be vigilant for the below signs of abuse.

### General signs of abuse

Some of the signs of abuse are the same, regardless of the type of abuse that the child is experiencing. Examples include (but are not limited to):

- changes in behaviour, such as angry outbursts, aggressive behaviour or becoming withdrawn or anxious
- changes in eating habits – if verbally communicated
- sleep problems or experiencing nightmares – if verbally communicated
- continence problems, such as bed-wetting or soiling themselves – if verbally communicated
- appearing afraid of particular individuals or making excuses to avoid people
- self-harming• suicidal thoughts
- knowing about topics and issues that are not appropriate for their age

- not receiving adequate or timely medical care or treatment for injuries
- frequent absences from our online learning platform
- lacking social skills and/or having few friends
- running away from home or going missing

## Neglect

Neglect is the failure to meet a child's basic needs. Neglect is the most common form of child abuse and often takes place at the same time as other types of abuse.

Neglect can be difficult to recognise but it is important to be aware of and act on any indicators of neglect. Examples include a failure to:

- provide adequate food, clothing and shelter
- receive appropriate medical and dental care
- ensure that a child is accessing regular education
- provide supervision that is appropriate to their age and stage of development
- meet their emotional needs – for example, to feel safe and loved

The potential signs of neglect include (but are not limited to):

- being unclean or 'smelly' – if verbally communicated
- being hungry frequently – if verbally communicated
- losing weight or being underweight – if verbally communicated
- wearing inappropriate clothing
- reports of a child being left alone or unsupervised for a period of time that is unsuitable for their age or stage of development
- untreated injuries, medical conditions or dental issues
- poor language, communication or social skills
- not having many friends
- regularly complaining of tiredness

## Physical abuse

Physical abuse is abuse that causes physical harm to a child. It may involve hitting, shaking, throwing, burning/scalding, drowning, suffocating, poisoning or otherwise. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Bruising and cuts are common on children, but it is important to view all injuries in a wider context and to be aware that some injuries may have been inflicted, rather than being accidental.

The indicators of physical abuse include (but are not limited to):

- unexplained marks or bruising, or an explanation which is inconsistent with the injury
- multiple bruises
- burns, e.g. from a cigarette or mirroring the shape of an object
- scalds
- bite marks
- broken skin
- physically flinching from physical contact or touch

## Emotional abuse

Emotional abuse is the emotional maltreatment of a child which causes adverse effects on the child's emotional development. It may involve telling a child that they are worthless or unloved, inadequate, or making them feel that they are not valued.

Emotional abuse may also include:

- not giving the child opportunities to express their views, deliberately silencing them, or belittling what they say or how they communicate
- age or developmentally inappropriate expectations being imposed on children that are inappropriate for their age or stage of development
- serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

Emotional abuse can be hard to identify due to there being no physical signs. It should be recognised that a child who appears well looked after could still be suffering from emotional abuse.

Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

The indicators of emotional abuse may include (but are not limited to):

- rocking
- sulking
- hair twisting
- being unable to play
- experiencing sudden speech disorders
- being fearful of making a mistake
- being withdrawn, anxious or depressed
- self-harm
- being fearful of a parent being spoken to about their changes in behaviour.

## Sexual abuse

Sexual abuse involves forcing or enticing a child to take part in sexual activities. It can take the form of physical contact and/or non-contact activities.

Physical contact includes assault by penetration (for example, rape or oral sex) or non-penetrative acts, such as masturbation, kissing, rubbing, and touching outside of clothing.

Non-contact activities includes children looking at, or being involved 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.

Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse can be perpetrated by men, women or other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) and there is a separate section about this later in this policy.

Upskirting The Voyeurism (Offences) Act 2019, which is commonly known as the Upskirting Act, came into force in 2019.

Upskirting is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission

and/or knowledge, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.

Pupils of any gender can be victims of sexual abuse. Any child reporting sexual abuse needs to be taken seriously and listened to.

Signs of sexual abuse include (but are not limited to):

- pain or itching in the genital area
- stomach pains
- discomfort sitting down or walking
- sexually transmitted diseases
- bruising or bleeding in the genital area
- vaginal discharge or infection
- pregnancy
- having inappropriate sexual knowledge for their age
- sexual drawings or language
- bed-wetting
- having secrets which they say they cannot tell anyone
- having unexplained money suddenly
- not being allowed to have friends.

## Specific Safeguarding Issues

### Child Sexual Exploitation (CSE)

Child Sexual Exploitation is a form of sexual abuse. It occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity. An abuser will gain the trust of a child or control them through blackmail or violence.

CSE can happen in person or online. A child exploited online may be forced to:

- distribute sexual images of themselves
- film or livestream sexual activities
- engage in sexual conversations

The indicators of potential CSE can include (but are not limited to):

- going missing
- not attending online classes
- having sexual knowledge that is inappropriate for their age
- using drugs or alcohol
- having unexpected gifts or money that they will not explain the source of
- concerns regarding sexual health
- becoming isolated from family and friendship groups
- struggling with trust
- declining emotional wellbeing.

### Child Criminal Exploitation (CCE)

Child Criminal Exploitation is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into criminal activity.

This can include children being involved in transporting drugs or money (county lines), working in cannabis factories, shoplifting or pickpocketing, as well as being forced or manipulated into committing crime, such as vehicle crime or threatening/committing serious violence to others. Children can be trapped in this kind of exploitation by being threatened with violence or coerced into debt. Children may also be coerced into carrying weapons, or may begin carrying a knife for protection from others.

The indicators of potential CCE can include (but are not limited to):

- going missing or travelling for unexplained reasons
- not attending online classes
- using drugs or alcohol
- being involved with gang activity or exhibiting signs of this, such as wearing clothing/accessories or using slang associated with gangs
- having unexpected gifts or money that they will not explain the source of
- committing 'petty' crime, such as shoplifting
- carrying a weapon
- becoming isolated from family and friendship groups
- unexplained injuries and refusal to seek medical help
- declining emotional wellbeing

### Serious violence

Children and young people can be involved with, and be at risk from, serious violent crime. This can be linked to Child Criminal Exploitation but can also occur separately.

The indicators of potential serious violent crime can include (but are not limited to):

- regular or increased absence from online classes
- decline in academic performance or behaviour
- change in friendships or relationships, often involving older individuals or groups
- signs of self-harm
- being involved with gang activity
- signs of assault or unexplained injuries
- significant change in wellbeing
- any potential indicators of CCE

Staff suspecting any of the above are to take detailed notes with dates and times, not ask any leading questions and refer the information to the DSL for Success Academies who will work with the child, family and third parties to ensure that the child is safeguarded effectively. This may include the involvement of a LADO, police, social services or via the child's local MASH service.

### Domestic abuse

Domestic abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional abuse. It can be an isolated incident, or a series of incidents and children can be victims. They may see, hear or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse).

The indicators of potential domestic abuse can include (but are not limited to):

- becoming anxious, withdrawn or depressed
- sleep difficulties
- bed-wetting
- complaining of physical symptoms, such as tummy aches
- behavioural issues, such as aggression or behaving in a much younger manner than their actual age
- low sense of self-worth or self-esteem
- self-harm
- alcohol or drug abuse

## Female Genital Mutilation (FGM)

Female Genital Mutilation involves procedures that intentionally alter/injure the female genital organs for non-medical reasons.

The Success Academies understands that staff have a mandatory duty to report to the police if they believe an act of FGM has been carried out on a girl under the age of 18. Failure to do this could result in disciplinary action for staff.

The signs of FGM include (but are not limited to):

- being absent from online lessons
- appearing to be in pain or have restricted movements
- regularly going to the toilet for prolonged amounts of time
- Planned holidays to countries which are known to practise FGM

Section 5B(11) of the Female Genital Mutilation Act 2003, inserted under section 74 of the [Serious Crime Act 2015](#), specifies that if staff suspect that FGM has been carried out on a pupil under 18 years of age, they have a statutory duty to report this to the police.

Statutory guidance on Female Genital Mutilation can be found here:

[Multi-agency statutory guidance on female genital mutilation - GOV.UK](#)

## Forced marriage

It is a criminal offence to force a person to marry in England and Wales. Young men and women can be at risk in affected ethnic groups. Forced marriage is distinct from arranged marriages.

Evidence shows that the issue of forced marriage affects certain sectors of communities. It typically affects girls in the age range of 14-16 years old. However, it can affect boys. One sign of forced marriage is a lengthy absence which is often unexplained.

Any member of staff with concerns regarding forced marriage should report this immediately to the DSL, who should raise the concern with the police.

## Child-on-child abuse

The Success Academies understands that abuse can take place from one child to another child. Child-on-child abuse can take a number of forms including (but not limited to):

- bullying, including discriminatory bullying and cyberbullying
- physical abuse
- sexual harassment, including online sexual harassment
- causing someone to engage in sexual activity without consent
- upskirting
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth-produced sexual imagery)

Sexual violence and sexual harassment can occur between two or more children of any age and sex. It can occur also through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can be both physical and verbal and can occur online and/or face to face.

Staff take a zero-tolerance approach to sexual violence and sexual harassment. It is never acceptable and should not be tolerated. It should never be passed off as "banter", "just having a laugh", "a part of growing up" or "boys being boys". Failure to do so can lead to a culture of unacceptable behaviour, an unsafe environment and encourage people to falsely believe that it is acceptable.

Physical interaction is not an issue for learners at Success Academies, but staff will report on any of the above concerns

## Radicalisation and extremism

The Department for Education defines extremism, radicalisation and terrorism as follows:

Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There is no single way of identifying an individual who is likely to be susceptible to a radical ideology. All staff will be aware of changes in pupils' behaviour which could indicate that they may be at risk.

[Statutory guidance on the Prevent duty](#)

Signs of radicalisation include (but are not limited to):

- being unwilling to listen to different points of view
- becoming obsessive about conspiracy theories
- changes in appearance and clothing
- converting to a new religion
- changes in hobbies or pastimes
- becoming secretive

- spending a lot of time online or on the phone
- changing friends or becoming isolated
- showing an interest in extremist organisations
- accessing extremist content online
- expressing unusual views
- making discriminatory comments
- becoming unwilling to engage with people from different groups, religions, etc.

Success Academies staff are aware of the above signs and will report on to the DSL – who in turn will communicate with relevant bodies to access support.

## Online safety and the use of mobile and smart technology

Success Academies is an online learning provider and learners can only access provision via computers, mobile or smart technology. Where Success Academies has concerns or suspicions about the misuse of technology, it will be reported to the Director and DSL – This will then be communicated with the learners parents/carers as appropriate.

Links to organisations supporting child online safety are published on our website.

## Pupils with SEND or medical needs

Children with special educational needs and/or disabilities (SEND) are three times more likely to be abused by their peers. Therefore, Success Academies accepts the responsibility to ensure that measures are taken to keep these pupils safe from harm.

## Safeguarding Roles and Responsibilities

All staff and volunteers who work directly with children must read Part one of the most recent version of [Keeping Children Safe in Education](#). This is covered as part of our safer recruitment process.

The responsibilities outlined below are indicative of the responsibilities held by different personnel within Success Academies.

### Teaching staff

The safeguarding responsibilities of staff include:

- understanding their role in and duty to safeguard children
- providing a safe online environment in which children can learn and thrive
- listening to the views, feelings and opinions of children within the community
- having knowledge of and being alert to the signs of abuse
- being knowledgeable about child protection and have the skills and understanding to identify any child in need of early help
- understanding that children may not feel ready, or know how to tell someone they are being abused, exploited or neglected, and/or they might not recognise their experiences as harmful
- being aware of what to do if a child tells them about being abused, neglected, or exploited and have the skills and knowledge to respond to this swiftly
- reassuring victims that they are being taken seriously, and will be supported and kept safe
- being aware of the role of the companies designated safeguarding lead (DSL), who this person is and how and when they should be contacted
- following the company's policies and procedures for recording and reporting safeguarding concerns
- being aware of whistle-blowing procedures and knowing where to seek further advice and support
- being able and prepared to deal with any safeguarding concern, including knowing who to speak to and understanding how to deal with sharing information and confidentiality issues
- being aware of all of the company's policies and know how these relate to safeguarding
- being aware of national and local guidance and legislation that related to safeguarding
- receiving appropriate training about safeguarding and child protection and online safety, and receive updates annually and as required;
- being able to recognise physical abuse, emotional abuse, sexual abuse, and neglect, as well as specific safeguarding issues including (but not limited to):
  - alcohol and substance misuse
  - bullying
  - Child Criminal Exploitation
  - child-on-child abuse
  - Child Sexual Exploitation
  - county lines
  - gang involvement
  - gender-based violence
  - hate crimes
  - domestic abuse
  - fabricated or induced illness
  - faith abuse
  - Female Genital Mutilation
  - forced marriage
  - mental health issues
  - missing children
  - modern slavery and human trafficking
  - poor parenting
  - private fostering
  - online abuse/cyberbullying
  - radicalisation and extremism
  - serious violence
  - teenage relationship abuse
  - upskirting
- seeking advice when they feel they need support or guidance to recognise the signs or understand the issues set out about above
- being aware that safeguarding concerns can be linked to or caused by factors in a child's wider environment outside of the family, such as sexual and criminal exploitation, and serious youth violence, which is sometimes referred to as

contextual safeguarding

- being aware of extremism and radicalisation and their Prevent duties
- knowing that if a child is missing from education, this poses a safeguarding risk
- knowing what to do if they suspect a child is missing from education or about to leave the country and following the correct procedures
- recognising that children can abuse children
- understanding the impact that trauma and adverse childhood experiences can have on children, including the impact it can have on behaviour, educational outcomes and mental health
- understanding and being alert to the specific vulnerable groups, such as those with SEND, or with other health conditions
- being aware that looked-after children and young carers are more vulnerable, and being alert to their safety, wellbeing and welfare
- being aware of the relationship between mental health issues and abuse
- understanding the barriers that prevent children from reporting safeguarding issues
- understanding that often safeguarding issues overlap and that a child might experience multiple forms of abuse

## The Director

The safeguarding responsibilities of the headteacher include:

- being responsible for the implementation of this policy and all related policies and procedures
- ensuring that Success Academies offers a safe online environment by ensuring that it has a health and safety policy and procedures which meet statutory responsibilities for the safety of the community
- liaising with the DSL regarding the effectiveness of safeguarding and related policies and their implementation
- ensuring that the DSL is allocated appropriate time, training and resources to fulfil all of their functions
- ensuring that everyone within the community is aware of this policy and that it is implemented effectively
- ensuring that everyone has appropriate training to enable them to protect children and that they receive regular updates (at least annually)
- Responsible for the educational achievement and welfare of students who are looked-after and previously looked-after
- ensuring that the Success Academies has a robust system for gathering all appropriate checks in relation to all staff
- ensuring that safer recruitment practices are followed when recruiting for posts, and act as a case manager when an allegation is made against a member of staff
- ensuring that learners are not left alone online and unsupervised at any time
- being aware of the need to learn from serious case reviews and thematic learning reviews

## The designated safeguarding lead (DSL)

The DSL is the lead for child protection and safeguarding at Success Academies. The safeguarding responsibilities of the DSL include:

- undertaking the training required to fulfil their role effectively, in line with statutory requirements
- ensuring that all staff are aware of key policies regarding safeguarding and that relevant policies are available on the website
- ensuring that all staff are aware of the role that they have to play in safeguarding and child protection and are supported and adequately trained to fulfil this role
- being available in term time to provide advice and support on child welfare, safeguarding and child protection matters
- being the point of contact for staff who have a concern about a child's welfare, safeguarding, or a child protection issue
- acting as a point of contact for local and national safeguarding partners
- taking part in and contributing to strategic discussions and multi-agency meetings, and supporting other staff to do so where relevant
- liaising with other staff to ensure that pupils are safeguarded effectively
- ensuring that account is taken of the risk to children outside of their families and considering whether children are at risk of exploitation and/or serious violence
- managing referrals to the children's services or other agencies (such as the police if a crime has been committed), or to the Channel programme, or the Disclosure and Barring Service (where someone has been dismissed or has left because of the harm they have caused or the risk of harm they pose)
- liaising with other agencies and partners in cases where early help is considered the most appropriate response, and contributing to any ongoing support and further assessments
- working in close partnership with social care and social workers
- being aware of which pupils have or have previously had a social worker and promoting their academic progress and attainment
- ensuring that actions the company takes (or proposes to take) does not jeopardise an ongoing investigation
- where there has been an allegation/report of sexual violence, the DSL will advise Success Academies on how to proceed, including undertaking an immediate risk assessment of need
- where there has been an allegation against a member of staff which is judged to meet the threshold for referral to the Local Authority Designated Officer (LADO), ensuring the child is not at risk and determining whether or not the case should be referred to children's social care as a suspected abuse case – In most cases the LADO will be from the WSCC unless the issue is related to a child or adult in another county
- being aware of local protocols and arrangements in respect of the Prevent duty
- being aware of local and national arrangements for early help
- responding to any safeguarding concerns in line with local and national requirements
- keeping accurate, detailed and secure written records of safeguarding issues, including any actions that have been taken and how these have been followed up
- ensuring that child protection records are kept up to date, stored securely and only shared with those who need to know in line with data protection legislation
- ensuring that staff are aware of national and local safeguarding protocols and procedures
- supporting staff to complete accurate and detailed records of any concerns that they have
- providing support for staff so that they are confident about safeguarding, child protection and welfare issues
- supporting staff to implement any reasonable adjustments or extra support needed to assist pupils who have been affected by abuse, recognising that, even where statutory services support has ended, the child can suffer long-term consequences
- helping staff to understand the links between safeguarding and academic/pastoral support
- fostering a culture of listening and making sure the wishes and feelings of the children are considered
- ensuring that effective links are built with parents and carers to foster a culture of engagement and open and honest

communication

- working with partner agencies and building links to promote the safety and welfare of learners
- supporting Success Academies with fulfilling its Prevent duty and keeping up to date with the latest guidance in relation to Prevent;
- where at-risk pupils transfer schools, ensuring that the new school is given the information needed to keep the child and others safe, including both victims and perpetrators
- ensuring that Success Academies child protection policy and procedures are reviewed annually and always remains up to date and monitoring the implementation and effectiveness of said policies and procedures.

## Processes and Procedures

### Reporting concerns

- early help processes – This is the responsibility of the DSL, reports are to be made as soon as possible and communicated to appropriate staff
- procedures for reporting concerns to the DSL – Send an email as soon as possible, do not mention the child by name, but use initials – The DSL will ask for more details if required
- how Success Academies will make referrals to social care – initially through the child's local MASH team, then onwards at their advice if appropriate
- processes for maintaining accurate records – The DSL will record all safeguarding concerns in a secure online file
- how allegations against staff are managed – The director will manage all allocations and involve external agencies and its HR partner company and legal team for advice and action where appropriate

### Recruitment

The Director and DSL have received safer recruitment training (via WSCC). Recruitment processes will move to Sussex HR in 2025, they have staff fully trained in safer recruitment processes.

All staff working with Success Academies must have an up to date DBS certificate or be subscribed to the update service.

The Director must have site of these documents before being allowed to teach.

Key safeguarding scenarios are played out at interview for all candidates to ensure they have a basic grasp of safeguarding procedures.

Success Academies uses [The School Staffing \(England\) Regulations 2009](#) as a guideline for recruitment processes.

Other documents referred to for support and advice are:

- [The Rehabilitation of Offenders Act 1974](#)
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children.

### Training and induction

- All staff are aware of the company's child protection procedures and safeguarding policy.
- All members of staff receive safeguarding training as part of their induction.
- All staff have regular safeguarding updates and training on both general safeguarding and specific safeguarding issues.
- The DSL and any deputies undergo in-depth safeguarding training at least every two years.
- Parents are supported to understand safeguarding issues and how the Success Academies can help.
- Pupils are offered appropriate education and support to help keep them safe from harm.

### Links to related policies

Other Success Academies policies can be found on the website: [www.successacademies.co.uk](http://www.successacademies.co.uk) and include:

- anti-bullying policy
- attendance policy
- behaviour policy
- complaints policy
- data protection and GDPR policy
- online safety policy
- safer recruitment policy
- SEND policy
- staff code of conduct
- whistleblowing policy

### Key Contacts

Key Roles and contacts

Director and DSL - Emlyn Hall, 07368558487, [emlyn@successacademies.co.uk](mailto:emlyn@successacademies.co.uk)

### Policy management and review

- This policy is reviewed annually by the Director and DSL – The next review should be completed by 25<sup>th</sup> September 2026
- This policy is available on the company website, with paper copies provided upon request.
- This policy is provided to and followed by all staff and volunteers.