

Safeguarding Policy

Document Owner: Quality and Funding Director & DSL, Robyn Harley and Group CEO, Raoul-Gabriel Urma		
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1	October 2018	Creation of policy (Jules Wix)
2	October 2019	Annual review (Jules Wix)
3	March 2020	Annual review (Judith Gorog)
4	May 2020	DSL Training Updates (Judith Gorog)
5	July 2021	Annual review (Kayte Winter) Updates to legislation. Consideration to EIF amendments and current requirements. Amendments to categories of abuse and risks. Factoring of online remote provision (Kayte Winter)
6	December 2021	Updates to DSLs and Safer Recruitment Process (Samantha Hackett)
7	July 2022	Annual review (Kayte Winter) Update to DSLs and MHFA. Update to Legislation KCSIE 2022. Update to referral process. Update to Reporting a Concern process. Update to include Learner Code of Conduct. Updates regarding Sexual Harassment. Update to include Out of Hours process
8	January 2023	Updates to DSLs - (DSLs and Kayte Winter)
9	November 2023	Annual review (Kate Norris) Updates to DSLs, policy owners and inclusion of Prevent risk register
10	December 2024	Annual review (Robyn Harley DSL) Update to format, legislation, definitions, roles and responsibilities, referencing process, training.
11	February 2025	Update to CEO Additional training requirements

1. Introduction

Cambridge Spark recognises and fully accepts its moral and statutory duty to safeguard and promote the welfare of children, young people and vulnerable adults and its duty to protect staff from unfounded allegations of abuse. Safeguarding is a key priority for Cambridge Spark and Leadership and Management are dedicated to ensuring Safeguarding, and its principles, is embedded in the policies and procedures that govern the organisation's operations. Safeguarding topics will also be embedded within the delivery of programmes to learners via coaching sessions, progress reviews and awareness raising events.

1.1 Scope

This policy applies to all staff and any external partners working on behalf of Cambridge Spark and learners and Employers. It should be read, understood and adhered to, alongside in conjunction with the following policies and procedures;

- Prevent Policy
- Health and Safety Policy
- Equality, Diversity and Inclusion Policy
- Staff Code of Conduct
- Learner Code of Conduct
- Whistleblowing Policy
- Process: Safeguarding Referral
- Online Safety Policy
- Safer Recruitment Policy
- Prevention of Workplace Harassment Policy
- Anti-Bullying Policy
- External Speakers Policy
- Disclosure process

The leadership team at Cambridge Spark will promote and obtain commitment to the Safeguarding Policy and reporting procedure through the following activities;

- Staff Induction - All staff are required to complete the Education and Training Foundation Side-By-Side Training within the first month of employment.
- Staff Induction - All delivery staff are required to complete the Education and Training Foundation Safeguarding in the FE and Skills Sector within the first month of employment.
- Formal CPD and Staff Briefing Sessions - These occur on an annual basis and attendance is mandatory for all staff company wide.
- Designated Safeguarding Leads (DSL) and Designated Safeguarding Officers (DSO) - required to complete training every two years, in acting as the point of support and within the organisation.
- Business and Service Updates - through the production and sharing of up to date legislation and any changes via the Safeguarding Team, Notion Safeguarding Page, monthly Newsletters and weekly departmental meetings.
- Caseload Reviews and Delivery Staff 1-2-1's - carried out on a monthly basis and concerns raised via the Safeguarding Referral Process.

- Safeguarding Sub Group - carried out by the lead DSO's on a monthly basis with DSO's to review safeguarding cases and assess the level of support being provided and then present a summary and highlight high-risk cases to the safeguarding working group.
- Safeguarding Working Group - to provide strategic oversight of Safeguarding and Prevent across Cambridge Spark, oversee the operational implementation of policy and procedures and respond to emerging trends and themes.
- Governance Review - Quarterly Governance Board meetings, carried out to review any concerns or risks raised.
- Awareness online training for learners - All learners complete Side by Side e-learning at the start of their programme (Topics: Radicalisation and Extremism, Saying Safe Online, What Can You Trust, British Values), and safeguarding is also discussed with every learner at a minimum of every 8-12 weeks during their Progress Review.

Cambridge Spark also recognises the implications and efforts needed to ensure our safeguarding practice is effective with consideration given to the fact that we provide a fully remote and e-learning delivery and learning environment. As per the Further Education and Skills Inspection Handbook, as an organisation, we will endeavour to ensure that this policy and our procedures are carried out regardless of the established learning environment in order to protect all learners online and offline,

2. Principles of Safeguarding at Cambridge Spark

The core principles of Safeguarding at Cambridge Spark are as follows;

- **Empowerment** - people are supported and encouraged to make their own decisions and informed consent.
- **Prevention** - early identification of potential harm to ensure action is taken before harm occurs.
- **Proportionality** - ensuring that intervention is appropriate to the risk presented.
- **Protection** - to provide support and representation for those in greatest need.
- **Partnership** - ensuring positive and established relationships with those in the community that can offer services to those most vulnerable when needed.
- **Accountability** - ensuring accountability and transparency within all aspects of safeguarding practice.

We will ensure:

- A safe environment for all children, young people and vulnerable adults.
- Those suffering or at risk of suffering significant harm or abuse are identified and referred to the necessary agencies as appropriate.
- All staff and learners learn about safeguarding, the organisation's policies and procedures and how to keep themselves and others safe.

We will do this by:

- Appointing and training Designated Safeguarding Leads (DSL) to be the point of contact for the organisation.
- Appointing and training Designated Safeguarding Lead Officers (DSLO) and Designated Safeguarding Officers (DSO) to support learners and coaches/mentors who are supporting learners.

- Ensuring that all staff are recruited in accordance with the ‘Safer Recruitment Guidelines.’
- Raising awareness of issues relating to the welfare and safeguarding of children, young people and vulnerable adults.
- Ensuring that all staff undertake the outlined safeguarding training and understand their responsibilities for safeguarding.
- Providing a ‘code of conduct’ to all staff which details expected behaviour to avoid misunderstandings and false allegations.
- Providing a ‘code of conduct’ to learners to promote British Values and ensure a safe learning environment for all.
- Promoting a safe physical and virtual environment.
- Engaging with stakeholders and agreeing to a shared commitment to safeguarding.
- Working with other agencies as appropriate (e.g. Safeguarding Partners, Regional Prevent Co-Ordinator) where an individual is being, or at risk of being, significantly harmed.
- Providing a framework for reporting and dealing with concerns and disclosures.
- Establishing clear procedures for the reporting and handling of allegations of abuse against staff.
- Ensuring that all concerns and allegations are treated fairly and seriously with action taken in a timely and appropriate manner.
- Ensuring that safeguarding, and wider topics such as Prevent and British Values, are discussed with learners not only at the start of their programme (through ETF online training) but on an ongoing basis through their journey through: Progress Reviews and contextualised learning opportunities within technical workshops and 1:1 reviews.

3. Legislative Frameworks and Guidance (please note this is not exhaustive)

The duties and responsibilities within this policy are defined within a wide range of legislation and guidance , including the following:

- Working Together to Safeguard Children (2024)
- Keeping Children Safe in Education (2024)
- Children Act (1989)
- Safeguarding Vulnerable Groups Act (2006)
- Care Act (2014)
- ADDSS 2005 (safeguarding Adults National framework of Standards)
- Disqualification under the Childcare Act (2006)
- Counter Terrorism and Border Security Act (2019)
- Prevent Duty (2023)
- Sexual Offences Act (2003)
- Equality Act (2010)
- Human Rights Act (1998)
- Mental Capacity Act (2005)
- Care and Support Statutory Guidance (2022)
- Education and Inspection Framework 2023 (Inspecting safeguarding in Early Years, Education and Skills Settings 2019)
- Review of Sexual Abuse in Schools and Colleges (2021) - “It could happen here”
- The Terrorism (Protection of Premises) Bill (2024) “Martyn’s Law”

4. Definitions

4.1 Child/Young Person – means anyone under the age of 18.

4.2 Vulnerable Adult – for the purposes of this policy, an individual over the age of 18, who are or may be eligible for community care services, and whose independence and well-being would be at risk if they did not receive appropriate health and social care support.

Adult safeguarding is about preventing and responding to concerns of abuse, harm or neglect of Adults.

4.3 Safeguarding and welfare – National statutory guidance 'Working Together to Safeguard Children' (2024) defines safeguarding and promoting welfare as:

- Providing help and support to meet the needs of children as soon as problems emerge protecting children from maltreatment, whether that is within or outside the home, including online
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children
- Taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.

Safeguarding adults - protecting the health, wellbeing and human rights of adults at risk, enabling them to live safely, free from abuse and neglect and ensuring people and organisations working together to prevent and reduce both the risks and experience of abuse or neglect.

Therefore, 'safeguarding' includes but is about much more than 'child and vulnerable adult protection'.

However, all staff are aware of our responsibility to act in order to protect children and vulnerable adults from various potential sources and types of harm:

- Neglect
- Physical abuse
- Sexual abuse
- Emotional abuse
- Bullying, including online bullying and prejudice-based bullying
- Racist, disability and homophobic or transphobic abuse
- Gender based violence/violence against women and girls
- Child-on-child abuse, such as sexual violence and harassment
- Radicalisation and/or extremist behaviour
- Child sexual exploitation and trafficking
- Child criminal exploitation, including county lines
- Serious violent crime
- Risks linked to using technology and social media, including online bullying; the risks of being groomed online for exploitation or radicalization; and risks of accessing and generating inappropriate content, for example 'sexting'
- Teenage relationship abuse
- Upskirting
- Substance misuse
- Issues that may be specific to a local area or population, for example gang activity and youth

violence

- Domestic abuse
- Female genital mutilation
- Forced marriage
- Fabricated or induced illness
- Poor parenting
- Homelessness
- So-called honour-based violence or faith-based violence
- Other issues not listed here but that pose a risk to children, learners and vulnerable adults

4.3 Early help what staff should look at for

Any child or vulnerable adult may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child or vulnerable adult who:

- Is disabled or has certain health conditions and has specific additional needs;
- Has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- Has a mental health need;
- Is a young carer;
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Is frequently missing in education/goes missing from care or from home;
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation;
- Is at risk of being radicalised or exploited;
- Has a parent or carer in prison, or is affected by parental offending
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- Is misusing drugs or alcohol themselves;
- Is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- Is a privately fostered child.

4.4 Abuse

Abuse is a form of maltreatment of a child or vulnerable adult, by another person or persons in a way that causes significant harm, or affects health, development or wellbeing. Somebody may abuse or neglect a child or vulnerable adult by inflicting harm, or by failing to act to prevent harm. Children or vulnerable adults may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults, or another child or children. This also includes child- on-child abuse, sexual violence and sexual harassment.

4.5 Extremism and Radicalisation

Extremism is defined as 'vocal or active opposition' to British values; democracy, the rule of law, individual liberty and mutual respect for and tolerance of those with different faiths and beliefs and for those without faith. Radicalisation is defined as 'the way in which a person comes to support terrorism and encourages other people to believe in views that support terrorism'. The Prevent Duty 2023 places a responsibility on specified authorities to prevent children and young people from becoming radicalised and as such is a key part of the safeguarding responsibilities of the organisation.

4.6 Safeguarding and Online Safety

We recognise the exciting opportunities technology offers to learners and stakeholders. While recognising the benefits we are also mindful that practitioners have a duty of care to ensure that children and vulnerable adults are protected from potential harm both within and beyond the physical and virtual boundaries of our learning environment.

To reflect our belief that when used appropriately and safely, technology can support learning, we encourage adults and children to use a range of technological resources for a wide range of purposes. At the same time, we do all we can to ensure that technology is used appropriately and that children and vulnerable adults are safeguarded against all risks. While it is not possible to completely eliminate risk, any e-safety concerns that do arise will be dealt with quickly to ensure that learners and staff adhere to safe practices and continue to be protected. We will communicate our safe practice in the use of technologies with all stakeholders through our IT Usage and Security Policy.

Cambridge Spark will ensure that due to the remote learning environment and the use of technology within our programmes, adequate awareness of Online Safety will be promoted and monitored to all staff members and learners. Learners and staff are required to complete the Online Safety module encompassed within the Side by Side Safeguarding Training provided by the Education and Training Foundation, completion of which is mandatory and monitored as part of their learning/induction plans.

5. Prevent

Cambridge Spark recognises that extremism and exposure to extremist materials and influences can lead to poor outcomes for students. We further recognise that if we fail to identify and challenge extremist views, in line with the PREVENT Duty outlined within Counter Terrorism and Border Security Act (2019), then we are failing to protect our students from potential harm. As such any concerns in relation to PREVENT will be treated as an urgent safeguarding concern and Cambridge Spark commits to the following;

- All staff will be trained to a sufficient level of knowledge and embed this within their professional activities and any interactions with learners and stakeholders.
- Ensuring that all learners are trained using the Education and Training Foundations Side By Side Training Programme within the first three months of their programme.
- Ensure that all stakeholders are aware of the organisations' policies and processes in relation to Safeguarding and Prevent and how to report any concerns.

5.1. Prevent policy and responsibilities

Cambridge Spark has a dedicated PREVENT Policy to outline any additional specifics in relation to PREVENT and should be read in conjunction with this policy.

In accordance with statutory duty, Cambridge Spark will ensure:

- Cambridge Spark will empower its learners to create communities that are resilient to extremism and to protect the wellbeing of particular learners who may be at risk of being drawn into violent extremism or crime.
- All staff are trained in Prevent so that they understand their responsibilities and feel confident in spotting the signs that an individual may be at risk of being radicalised.
- All learners understand the risks of extremism and how these may present in the workplace.
- The promotion of British Values through both the curriculum and as part of the organisation's culture.
- All partner organisations and employers understand their responsibilities to prevent learners from being radicalised.
- Concerns raised about learners or by learners themselves are dealt with immediately and referred to the relevant authorities as appropriate.
- Robust IT procedures which prevent learners and staff from accessing extremist platforms and websites.
- Close liaison with local and national partners including the DfE Prevent Co-Ordinator to better understand and communicate the local and national risks.
- A Prevent Risk Assessment and Action Plan is in place and regularly reviewed by senior managers.

We will do this by:

- Promoting and monitoring the use of Learner Communities i.e. Slack, KATE and APTEM and identifying any potential discriminatory language or actions towards specific groups or people with a particular protected characteristic
- Appointing and training a Designated Safeguarding Lead (DSL) to be the single point of contact for the organisation.
- Raising awareness of Prevent at every opportunity.
- Ensuring that all staff and learners understand that Prevent is part of their wider safeguarding responsibilities.
- Providing a framework for reporting and dealing with concerns and disclosures.
- Staff will undertake PREVENT Training in order to enable early identification in changes to learner behaviour that may indicate potential cases of radicalisation or extremism.
- Through learner engagement activities, such as progress reviews, coaching sessions and workshops, any possible behaviour changes will be identified, indicators include; discriminatory language or actions towards specific groups or people with a particular protected characteristic, possession or sharing of violent extremist literature, showing or sharing online material of an extreme nature to others, behavioural changes (for example, becoming withdrawn), expression of extremist views, advocating violent actions and means, association with known extremists, seeking to recruit others to an extremist ideology.

Where deemed appropriate Cambridge Spark will seek external support for learners or staff through referrals to the Channel Programme. This programme aims to work with the individual to address their specific vulnerabilities, prevent them becoming further radicalised and possibly entering the criminal justice system because of their actions.

More information can be found within the Channel Duty Guidance document available at:
<https://www.gov.uk/government/publications/channel-guidance>

Any concerns regarding PREVENT to be raised with the Cambridge Spark Designated Safeguarding Lead.

6. Roles and responsibilities

Cambridge spark staff have no investigative role where child and vulnerable adult protection is concerned. This is a matter for police and children's and adult social care. However, all staff have a responsibility to provide a safe environment in which children and vulnerable adults can learn and all staff have a responsibility to act to safeguard and promote children and vulnerable adult welfare. Some people have specific and/or additional safeguarding responsibilities.

6.1 Governors

Governors take seriously their responsibility to safeguard and promote the welfare of children and vulnerable adults.

The Governance board monitors compliance with statutory requirements and identifies areas for improvement. At least annually the Designated Safeguarding Lead (DSL) will prepare an annual safeguarding report to be tabled at the Governance Board meeting. Discussions will be recorded and any agreed and/or remedial action(s) documented and followed-through, formally and without delay.

The Governors have a responsibility to:

- Ensure that they comply with their duties under legislation and ensure that policies, procedures and training in the college are effective and comply with the law at all times.
- Should have a senior board level (or equivalent) lead to take leadership responsibility for the Cambridge Spark safeguarding arrangements.
- Should ensure that there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare.
- Ensure that a senior leader is appointed as the designated safeguarding lead and takes the lead responsibility for safeguarding and child protection (including online safety) and that this is explicit in the role holder's job description and that there is always cover for this role. Ensure the DSL and any deputies access and complete appropriate training which is regularly updated in-line with statutory guidance.
- Ensure appropriate safer recruitment policies are in place.
- Ensure that sufficient resources and time are allocated to enable staff to discharge their responsibilities, including support and supervision as required.
- Ensure all staff undergo safeguarding training at induction, updated regularly in line with Statutory guidance.
- Ensure appropriate monitoring and recording systems are in place.
- Ensure they undertake and complete their own mandatory Safeguarding training.

6.2 Designated Safeguarding Lead and Deputies

The Designated Safeguarding Lead/Deputy are expected to:

Manage referrals

- Managing, when required to do so, the referral of cases of suspected abuse or allegations to the relevant agencies. (Cases of suspected abuse to the local authority children's social care and adult social care as required, the Channel programme where there is a radicalisation concern as required and cases where a crime may have been committed to the Police as required).

- Providing advice and support to staff who have made referrals to other agencies.
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required.

Work with others

- Act as a point of contact with the safeguarding partners.
- As required, liaise with the “case manager” and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member.
- Attending case conferences and review meetings as appropriate.
- Liaise with staff (especially coaches, and SENCOs or the named person with oversight for SEN in a college) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and
- Act as a source of support, advice and expertise for all staff.

Training

- The Designated Safeguarding Lead (and any deputies) undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The Designated Safeguarding Lead should undertake Prevent awareness training.
- In addition to the formal training set out above, their knowledge and skills should be refreshed at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.
- Ensure each member of staff has access to, and understands, the safeguarding policy and procedures.
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation.
- Understand the importance of information sharing, both within the organisation, and with the safeguarding partners, other agencies, organisations and practitioners.
- Are able to keep detailed, accurate, secure written records of concerns and referrals. Keeping detailed, accurate, secure written records of concerns and referrals.
- Maintaining secure and accurate records of any child protection concern, referral, complaint or allegation.
- Understand and support the Organisation with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children and vulnerable adults from the risk of radicalisation.
- Can recognise the additional risks that children and vulnerable adults with Special Educational Needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND learners to stay safe online.
- Ensuring that accurate and up to date employment records are in place of all staff including DBS checks.

Raise Awareness

- Ensure the safeguarding policy is available publicly through the website and through EdUKATE.
- Ensure the safeguarding policies are known, understood and used appropriately.
- Ensure that all staff and learners understand their responsibilities for safeguarding through training and regular updates.
- Ensure the safeguarding policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, with the governing body.
- Link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.
- Ensuring safeguarding training records are in place.

- Providing periodic reports to the board about safeguarding incidents or referrals as well as policy implementation.

6.3 Lead Designated Safeguarding Officers

The Designated Safeguarding Lead Officers are expected to:

- Undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years.
- In addition to the formal training set out above, their knowledge and skills should be refreshed at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.
- A Designated Safeguarding Administration Officer will assess the situation and decide whether the matter needs to be referred to external agencies and Designated Safeguarding Lead, the matter needs to be recorded and monitored or if a support/intervention plan is required. Any support/intervention plan will be discussed with the allocated Learner Success Coach to ensure actions are followed and the learner remains supported.
- Support staff and learners to understand their responsibilities for safeguarding through training and regular updates via team meetings.
- Act as a source of support, advice for all staff.
- Monitor active cases and if further support or intervention is required.
- Report back to the Safeguarding working group on active referrals and support and any high risk referrals.
- Support learners with welfare and support needs.
- Support staff who are directly supporting learners with welfare and support needs.
- Maintain a record of any safeguarding referral, complaint or concern (even where the concern does not lead to a referral).
- Record and maintain concise and accurate records which may be used as a source of evidence.

6.4 Designated Safeguarding Officers

The Designated Safeguarding Officers are expected to:

- Undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years.
- In addition to the formal training set out above, their knowledge and skills should be refreshed at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.
- Act as a source of support, advice for all staff.
- Support learners with welfare and support needs.
- Support staff who are directly supporting learners with welfare and support needs.
- Maintain a record of any safeguarding referral, complaint or concern (even where the concern does not lead to a referral).
- Record and maintain concise and accurate records which may be used as a source of evidence.

6.5 Director of People Operations

The Director of People Operations is expected to:

- Carry out appropriate checks on staff, this should include an online search for digital screening and must include DBS checks at the correct level.
- Work with the People and Culture Team to ensure that all staff are trained to an acceptable standard, by establishing and maintaining a training plan / schedule and monitoring compliance with this, ensuring action is taken for non-compliance.
- Ensure that safeguarding policies and practices are a core part of the staff induction, which should include the Safeguarding Policy and referral procedure, Code of conduct and the role of the Designated Safeguarding Lead, Designated Safeguarding Lead Officers and Designated Safeguarding Officers.
- Develop, monitor and advise on the implementation of procedures for dealing with allegations against staff which are consistent with Children’s Safeguarding Partnership / social care procedures and national guidance.
- Manage the progress of allegations against staff, liaising with the Designated Safeguarding Lead, and other agencies as required.
- Maintain records of staff compliance with the single central record.

6.6 All staff and managers

Safeguarding is everyone’s responsibility and all staff involved in the organisation’s activities have a role to play.

All staff are expected to:

- Establish and maintain an ethos where all learners feel secure and are encouraged to talk and are listened to.
- Be able to reassure learners that they are being taken seriously and that they will be supported and kept safe and a learner should always be made aware that their concern or disclosure has to be escalated.
- Include within the programmes, opportunities for learners to acquire skills and attitudes to both resist abuse in their own home or working life. To encourage a belief in equality of opportunity, celebrate diversity and challenge extreme views.
- Promote inclusivity and preventative for all learners with the key focus being “Life in modern Britain”.
- Be aware that technology is a significant component in many safeguarding and wellbeing issues. Learners are at risk of abuse online as well as face to face. Learners can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messaging, non-consensual sharing of indecent images and sharing of abusive images and pornography to those who do not want to receive it.
- Undergo safeguarding training at induction, and will take part in regular development sessions where safeguarding updates/refreshers will be programmed. Safeguarding training for delivery staff is required to be completed within 1 week of starting, for all other staff it is to be completed within 1 month of starting
- Understand and adhere to the reporting procedure for a safeguarding concern, seeking support from the DSO, DSLO or DSL where necessary.
- Staff have responsibility to report safeguarding concerns. If any member of staff is concerned about the welfare or safety of a child, young person or vulnerable adult, they must report their concerns to the safeguarding team at safeguarding@cambridgespark.com , as soon as practicably possible. If the member of staff has made written notes of the disclosure or

concern, these must be kept and stored securely in case they are required at a later stage.

- Staff will receive training on how to deal with disclosures. If the child or adult at risk is in immediate harm, then the relevant authorities (e.g. police) must be contacted immediately. In this situation, the member of staff must ensure that the child or vulnerable adult is accompanied and kept safe until the relevant authorities arrive.
- If a **member of staff** is concerned about the welfare and/or safety of a learner or colleague, they must treat it as a matter of urgency and follow the Safeguarding Referral Process and all associated SLAs within.
- If **any learner** reports unsafe practices or safeguarding issues within their working environment to a member of Cambridge Spark staff, the staff member must report the incident using the Safeguarding Referral Process. The safeguarding working group will offer guidance and signposting for the staff member and learner and will support the learner to report the matter through the employer's whistleblowing/reporting procedures or report the matter directly to the employer if more appropriate.

Responding to a disclosure/concerns

Where any member of staff, learner, or governor has a concern about a child, young person or vulnerable adult, they must report it immediately. There are a number of reasons why a someone might need to report a concern:

- In response to something the person has said.
- In response to signs or suspicions of abuse.
- In response to allegations made against a member of staff, employer, carer or parent.
- In response to bullying, face to face or online.
- Observation of inappropriate behaviour / views.
- In response to anything which makes a learner/ young or vulnerable person uncomfortable.
- It is important for staff to note that if an incident has occurred outside of the training programme, it should still be reported.

On receipt of safeguarding information regarding a child, young person or vulnerable adult or member of staff:

- Stay calm.
- Reassure the person reporting their concern that they have done the correct thing in telling you.
- Listen carefully to what is being said and take them seriously.
- Do not promise confidentiality.
- Explain that you have a duty to tell a Designated Safeguarding Officer, and that their concerns may be shared with others who could play a part in protecting them or the individual concerned.
- Reassure them that they will be involved in decisions about what will happen wherever possible. For concerns that involve potential risk to children, this cannot always be guaranteed.
- If they have specific communication needs, provide support and information in a way that is most appropriate to them, or seek support to do this.
- Do not be judgemental or jump to conclusions.
- Do not give an opinion or offer advice.
- Record in writing exactly what is being said, if you cannot do this at the time, then record immediately afterwards.
- Do not discuss the situation with others
- Do not investigate the issue yourself as it must be escalated. The DSL/Safeguarding Team will make a decision on further action to be taken and will, where possible, keep the member of staff informed as to the action that has been taken.

6.7 Out of Hours Referrals

Cambridge Spark operates working hours between 09:00am and 17:30pm. Referrals received during this time will be actioned in accordance with the process and timelines as outlined within this policy.

All referrals received outside of these working hours will be actioned appropriately the next working day. All staff and learners are aware, via policy and guidance, that should there be an immediate risk of harm or to life then the appropriate action is to dial 999 and seek help from emergency services.

Cambridge Spark will indicate these arrangements via auto-reply emails to the safeguarding email address.

6. Safer Recruitment

6.1 Staff Checks

Cambridge Spark operates safer recruitment and employment practices in accordance with Part 3 of 'Keeping Children Safe in Education' and will ensure that the required level of checks for members of staff will be made.

Staff checks and critical processes undertaken include:

Enhanced Disclosure and Barring Service (DBS) check where the member of staff is involved or likely to be involved in 'regulated' activity. Where this is not the case a Basic DBS check will be made. Basic DBS Checks will be updated every year for Safeguarding leads, every two years for front facing delivery employees and every three years for the remainder of the company.

Basic DBS checks to be carried out for all new employees before signing an employment contract with them.

Where a conviction is recorded, the DSL will carry out a risk assessment and decide whether to confirm or reject the individual's appointment. (Anyone that is barred from working with children or vulnerable adults will NOT be appointed, if an applicant wishes to dispute any information contained in a disclosure, they may do so by contacting the DBS):

- Two or more satisfactory employment/education references, covering at least 3 years.
- Check on gaps in work history.
- Evidence of identity is obtained, including the right to work in the UK.
- Areas of concern in the CV or application will be addressed during the interview.

6.2 Allegations against Staff

In rare instances, staff of educational institutions have been found responsible for abuse of vulnerable adults and children. Because of their frequent contact with children, young and/or vulnerable people, staff may have allegations made against them. Cambridge Spark recognises that an allegation of any form of abuse made against a member of staff may be made for a variety of reasons and that the facts of the allegation may or may not be true. It is imperative that those dealing with an allegation maintain an open mind and that investigations are thorough and not subject to delay.

The primary concern in the event of an allegation against a member of staff is to ensure the safety of the young person or vulnerable adult. In all cases, action will be taken quickly, confidentially and



professionally, with all parties clear that suspension is not an indicator of guilt, but a required part of a process. The word staff in this instance is used for ease of description; applicable to all staff, whether teaching, administrative, management or support as well as to invited partners or volunteers

Where an allegation is made, the DSL will meet with HR and senior managers to discuss the action that Cambridge Spark must follow. In order that a full and fair investigation can be carried out, consideration must be given to suspending the member of staff. Where it is clear that a criminal offence may have occurred, the matter must be reported to the police and advice sought prior to alerting the alleged perpetrator. Cambridge Spark commits to cooperating with any investigations in full in order to protect those most vulnerable from any further harm or injustice. Any subsequent dismissal must be reported to the Disclosure and Barring Service.

In the event that a member of staff suspects any other member of staff of abusing a child, young person or vulnerable adult, it is their responsibility to report these concerns to the DSL, except when they are the person against whom the allegation is being made. In this instance, the report should go to HR or a senior manager.

Review of this Policy

This policy will be reviewed annually by The DSL Robyn Harley, unless triggers such as changes to internal processes, national policy or legislation dictates a review out of sequence.

Senior Manager Sign-off

Name: Raoul-Gabriel Urma

Title: Group CEO

Signature: DocuSigned by:
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Date: 05 March 2025

Appendix 1 Safeguarding procedures for reporting a concern

