

Safeguarding & Prevent Policy



The Spark Group

Introduction

The Spark Group is fully committed to safeguarding and promoting the welfare of all young people, particularly those aged 14-19, who engage with our services. We recognise our responsibility to create and maintain a safe and supportive environment where every individual is respected, valued, and protected from harm.

This policy outlines our approach to safeguarding and sets out the procedures that all employees must follow to ensure the safety, wellbeing, and protection of all young people.

Scope of the Policy

This policy applies to:

- All employees;
- All sub-contractors;
- All contractors;
- All volunteers;
- Anyone working on behalf of The Spark Group

It is the responsibility of everyone involved with The Spark Group to familiarise themselves with this policy and adhere to its guidelines.

Legal Framework

This policy is based on and complies with the following legislation and statutory guidance:

- Children Act 1989 and 2004;
- Working Together to Safeguard Children;
- Keeping Children Safe in Education 2025;
- The Prevent Duty (Counter-Terrorism and Security Act 2015);
- Data Protection Act 2018 (UK GDPR)

Key Principles

The Spark Group's safeguarding approach is guided by the following principles:

- The welfare of the child is paramount;
- Safeguarding is everyone's responsibility;
- Early intervention is essential;
- The voice of the young person must be heard and respected;
- Safeguarding includes harm occurring inside and outside the home (contextual safeguarding);

- Safeguarding continues beyond age 18 where vulnerability remains (transitional safeguarding)

Roles and Responsibilities

Designated Safeguarding Lead (DSL)

The DSL is responsible for ensuring the effective implementation of safeguarding practices and is the primary point of contact for any safeguarding concern. The DSL will:

- Respond to and investigate concerns;
- Liaise with statutory agencies when appropriate;
- Maintain confidential records of safeguarding incidents;
- Ensure employees are trained and up to date on safeguarding and Prevent responsibilities

Designated Safeguarding Lead (DSL) Contact Details:

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07818 410292

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Deputy Designated Safeguarding Lead (DDSL) & Designated Looked After Children (LAC) Lead Contact Details

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All employees

All employees must:

- Complete enhanced DBS checks before starting their role;
- Undergo regular training in safeguarding, Prevent, and online safety at the appropriate level;
- Be vigilant and report any concerns regarding the safety or wellbeing of young people to the DSL;
- Follow the safeguarding procedures outlined in this policy

Safer Recruitment

The Spark Group uses safer recruitment practices to ensure unsuitable individuals are not working with young people. All applicants, including volunteers, must:

- Undergo an Enhanced DBS check;
- Provide proof of identity, qualifications, and work history;
- Supply two professional references;
- Complete an interview process that includes safeguarding related questions.

Safeguarding Training

Employees will complete the following training:

- Safeguarding (every 3 years);
- Keeping Children Safe in Education Update (annually);
- Prevent (every 3 years);
- Online Safety (every 2 years);
- Safer Recruitment (for managers) (every 2 years)

Training will be completed sooner than these frequencies if required due to changes in legislation, guidance, or identified organisational need.

Visitor Identification and Sign-In Procedures

All visitors to the centre are managed safely and appropriately in order to safeguard learners. Visitors must:

- Report to reception or a designated staff member on arrival;
- Sign in using the visitor log system;
- Provide identification where requested;
- Wear a clearly visible visitor lanyard at all times while on site;
- Sign out when leaving the premises

Recognising and Reporting Concerns

Employees must be vigilant and aware of the signs of abuse, neglect, or other safeguarding issues. When a concern arises, employees must:

1. Record the concern, including the date, time, and details of the concern;
2. Report the concern to the DSL immediately;
3. Maintain confidentiality and only share information only on a need-to-know basis

Responding to Disclosures

If a young person discloses a safeguarding issue to an employee, the employee should:

- Listen carefully and without interruption;
- Reassure the young person that they have done the right thing by speaking up;
- Avoid making promises, especially around confidentiality as it may need to be reported elsewhere;
- Record the disclosure accurately and report it to the DSL immediately

Allegations against Employees

If a safeguarding concern is raised about an employee, this must be reported to the DSL immediately. The DSL will:

- Take steps to ensure the safety of the young person;
- Consider suspension or temporary removal from duties if required;
- Maintain full records of the investigation and outcome

Prevent Duty

The Spark Group has a duty to prevent the risk of radicalisation and extremism. All employees will receive Prevent training to help them:

- Recognise warning signs of radicalisation;
- Understand reporting procedures;
- Protect young people from extremist influence

Further forms of abuse and safeguarding concerns

Core Categories of Abuse

Emotional abuse

Persistent emotional maltreatment that harms a child's emotional development. This may include humiliation, threats, rejection, silencing, inappropriate expectations, overprotection/limiting normal development, exposure to domestic abuse, serious bullying, exploitation or corruption.

Physical abuse

Physical harm such as hitting, shaking, throwing, poisoning, burning/scalding, drowning, suffocating or otherwise causing physical harm. This includes fabricated or induced illness.

Sexual abuse

Forcing or enticing a child to take part in sexual activities (contact or non-contact), including online. It can be perpetrated by adults or other children.

Neglect

Persistent failure to meet a child's basic physical and/or psychological needs, resulting in serious impairment of health/development. This may include inadequate food/clothing/shelter, lack of protection/supervision, failure to access medical care, and emotional neglect. Spark recognises adolescent neglect as harmful and will escalate concerns via the DSL.

Safeguarding Concerns

Some safeguarding concerns are set out in the main body of this policy. The information below summarises further forms of abuse and specific safeguarding issues (based on Annex B of KCSIE).

All concerns must be recorded and reported to the DSL immediately in line with The Spark Group's reporting procedures.

Child abduction and community safety incidents

Child abduction is the unauthorised removal/retention of a child from a parent/person with legal responsibility. Community safety incidents (e.g., unknown adults engaging children, people loitering near settings) may raise safeguarding concerns. The Spark Group will take concerns seriously, record them and escalate to the DSL.

Child Criminal Exploitation (CCE)

CCE is where a child is coerced, manipulated or deceived into criminal activity for the benefit of others (including through threats, violence, coercion or debt bondage). Children may appear to “consent”, but they are victims. CCE can affect any child, and risks can differ for girls and boys. Children exploited criminally may also be at higher risk of sexual exploitation.

Examples of CCE include: transporting drugs/money, cannabis cultivation, shoplifting/pickpocketing, vehicle crime, being pressured into threatening/serious violence, or carrying weapons.

Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse where a child is coerced, manipulated or deceived into sexual activity. It can be contact or non-contact abuse (including online grooming and the creation/sharing of sexual images). It may be a one-off incident or occur over time, including organised exploitation.

Possible indicators may include: older partners, STIs, sexualised behaviour beyond expected development, pregnancy, unexplained gifts/money, emotional change, substance misuse, missing episodes, persistent lateness, poor attendance/disengagement from education.

Child-on-child abuse

Children can abuse other children. This may include:

- bullying (including cyberbullying);
- physical abuse (e.g., hitting, kicking, biting, hair pulling);
- abuse in intimate relationships between children (TRA);
- sexual violence (rape, assault by penetration, sexual assault);
- sexual harassment (including online harassment);
- causing someone to engage in sexual activity without consent;
- consensual or non-consensual sharing of nudes/semi-nudes;
- upskirting (a criminal offence);
- initiation/hazing rituals

The Spark Group does not tolerate child-on-child abuse and will never dismiss it as “banter” or “part of growing up”. Concerns will be recorded, acted on and managed under our safeguarding procedures, with support for victims, alleged perpetrators and other affected children.

Sharing nudes and semi-nudes

The creation/sharing of nudes or semi-nudes by under-18s is illegal. The Spark Group will respond swiftly to safeguard children, support those affected and follow relevant national guidance via the DSL.

Children and the court system

Children may be required to give evidence in criminal or family courts. This can be stressful and may impact wellbeing. When we become aware a child is involved in court processes, this must be treated as a safeguarding and wellbeing concern and supported appropriately via the DSL.

Children Missing from Education

Repeated absence may indicate a safeguarding risk including exploitation and any concerns will be escalated promptly.

Children missing from home or care

Children who go missing may be indicating they are unsafe or being abused/neglected/groomed/exploited. The Spark Group will consider both:

- Push factors (e.g., conflict, bullying, feeling powerless, not being listened to, neglect/abuse)
- Pull factors (e.g., friends/family, money/drugs, peer pressure, trafficker pressure)

Where a child is absent and their location is unknown, The Spark Group will follow attendance/safeguarding processes and escalate concerns to the DSL. This may include the police and children's social care where appropriate.

County Lines

County lines is a form of criminal exploitation linked to drug supply using dedicated phone lines/social media. Children may be exploited to move, store or sell drugs/money and may be controlled through intimidation, violence (including sexual violence) and weapons. Children can become trapped through threats, kidnap risk and manufactured debts.

Possible additional indicators may include: missing and found away from home, involvement in serious violence/knife crime, receiving drug requests via phone line, "plugging", found in "trap house/cuckooed" accommodation or hotel rooms, debt bondage, bank accounts used for dealing.

Cyberbullying

Cyberbullying is bullying using electronic media (e.g., messaging, images, social media posts, forums, email). The Spark Group will respond to concerns that impact children, including behaviour outside the setting where it affects the child's safety/wellbeing. Where a criminal offence may have occurred, the DSL will consider police involvement.

Drugs, Alcohol and Substance Misuse

Substance misuse can increase a child's or young person's vulnerability to exploitation, it can mask trauma and/or be used as coercion.

Possible indicators can include: sudden behavioural change, smell of substances, deteriorating attendance, risk-taking behaviour. All concerns must be reported to the

DSL.

Domestic abuse

Domestic abuse can have a serious impact on children, including those who see, hear or experience its effects. The Spark Group recognises children as victims in their own right and will respond as a safeguarding concern. We will work through the DSL to ensure appropriate support, including predictable routines, emotionally supportive approaches, and safe access to help. We will also liaise with relevant agencies as required.

Fabricated or Induced Illness

This occurs when a parent/carer deliberately exaggerates or induces illness in a child. Any concerns relating to fabricated or induced illness must be referred to the DSL.

Possible indicators can include: inconsistent medical history, symptoms only in presence of carer, frequent medical appointments without diagnosis.

Gender-Based Violence (VAWG)

Violence against women and girls and gender-based violence can include sexual harassment, sexual assault, image-based abuse, misogynistic bullying, coercive control, harmful online ideology. The Spark Group does not tolerate this and it will never be dismissed as “banter.”

Homelessness

Homelessness or risk of homelessness can present a safeguarding risk. The DSL will provide support via referral routes to housing services. Housing support does not replace a referral to children’s social care where a child has been harmed or is at risk of harm. 16-17-year-olds living independently require a tailored response and appropriate referrals.

Honour-Based Abuse (HBA) and harmful practices

Honour-Based Abuse (HBA)

HBA includes incidents/crimes committed to protect or defend perceived “honour” of a family/community. It may involve wider family/community pressure and multiple perpetrators. All forms of HBA are abuse and must be escalated.

The Spark Group will not attempt to mediate directly with family members where risk is suspected; the DSL will follow safeguarding procedures and seek advice from appropriate agencies.

Breast ironing / breast flattening

A harmful practice intended to delay breast development. This is abuse and must be recorded and reported to the DSL.

Female Genital Mutilation (FGM)

FGM is the partial/total removal of external female genitalia for non-medical reasons. It is child abuse and a criminal offence. The Spark Group will act immediately on concerns and follow mandatory reporting requirements where they apply.

Forced marriage (FM)

Forced marriage is where full and free consent is not given and pressure/coercion is used. It is abuse. It is also a crime to cause a child to marry before 18 (including non-binding/ unofficial marriages). The Spark Group will escalate concerns via the DSL and follow safeguarding procedures, including careful information sharing.

Modern slavery, trafficking and the National Referral Mechanism (NRM)

Modern slavery includes slavery, servitude, forced or compulsory labour and trafficking. Exploitation can include sexual exploitation, forced labour, servitude, forced criminality and organ removal. The Spark Group will treat any indicators as safeguarding concerns and escalate via the DSL.

Child trafficking

A child transported/recruited/harboured for exploitation is a victim of trafficking. Consent is irrelevant. The Spark Group will report concerns to the DSL who will follow safeguarding procedures and referrals.

National Referral Mechanism (NRM)

NRM is the UK framework for identifying and supporting potential victims of modern slavery/trafficking. Where indicators suggest trafficking/modern slavery, the DSL will consider referral routes in line with local procedures.

Online safety, cybercrime and gaming

Online risks include:

- *Content*: harmful/illegal material (e.g., pornography, hate, self-harm/suicide content, extremism, misinformation);
- *Contact*: harmful interaction (e.g., grooming, coercion, adults posing as children);
- *Conduct*: harmful behaviour (e.g., bullying, sharing sexual images);
- *Commerce*: scams/phishing, gambling, harmful advertising

The Spark Group will raise awareness through acceptable use expectations, training, curriculum input and clear reporting routes via the DSL.

Cybercrime

Cybercrime is a serious criminal offence. Where The Spark Group becomes aware of concerns, the DSL will consider the safeguarding risk and whether police involvement is required.

Risks associated with gaming

Online gaming may carry safeguarding risks, including grooming and harmful contact. The Spark Group will promote safe use, parental controls/age ratings, boundaries and reporting routes.

Prevent, radicalisation and extremism

Children may be vulnerable to extremist ideology and radicalisation. This is a safeguarding concern. Staff must record concerns and report them to the DSL promptly for appropriate action, including consideration of Prevent/Channel referral routes in line with local procedures.

Private Fostering

A private fostering arrangement occurs when a child under 16 (or under 18 if disabled) lives with someone who is not a parent or close relative for 28 days or more. Where this arises the DSL must be informed immediately who will then inform the Local Authority.

Serious violence

Employees should be alert to indicators that a child may be at risk from or involved in serious violence (e.g., increased absence, changes in friendships, decline in wellbeing/performance, self-harm, assault/unexplained injuries, unexplained gifts/new possessions). Concerns must be reported to the DSL.

Youth Violence and Gang Involvement

Youth violence and gang affiliation are safeguarding concerns.

Potential indicators may include: association with known gang members, territorial behaviour, carrying weapons, unexplained money or possessions, social media gang affiliation, withdrawal from positive peer groups

Girls and young women may be exploited by gangs for sexual or criminal purposes.

Useful Acronyms & Descriptors

CCE	Child Criminal Exploitation
CSE	Child Sexual Exploitation
CSC	Children's Social Care
DBS	Disclosure and Barring Service
DfE	Department for Education
DPO	Data Protection Officer
DSL	Designated Safeguarding Lead

EHC Plan	Education, Health and Care Plan
FGM	Female Genital Mutilation
HBA	Honour-Based Abuse
KCSiE	Keeping Children Safe in Education
LA	Local Authority
LAC / Cared for Children	Children looked after by the Local Authority
LGBTQ+	Lesbian, Gay, Bisexual, Transgender, Queer, plus
NPCC	National Police Chiefs' Council
PLAC	Previously Looked-After Children (children previously in Local Authority car)
PHE	Public Health England
PSHE	Personal, Social and Health Education
RSHE	Relationships, Sex and Health Education
SCR	Single Central Record
SENCO	Special Educational Needs Co-ordinator
SLT	Senior Leadership Team
SPOC	Single Point of Contact (Prevent Lead)
TRA	Teenage Relationship Abuse
UK GDPR	UK General Data Protection Regulation
VSH	Virtual School Head

Online Safety

We are committed to ensuring that young people are safe in their digital interactions. All employees will receive online safety training.

All online teaching and communication tools are used in a way that protects learners and employees, particularly regarding safeguarding, data protection, and professional boundaries.

CCTV

All areas of the centre are covered by CCTV. In the case of allegations, CCTV may be accessed and reviewed for investigative purposes.

Confidentiality and Information Sharing

Safeguarding concerns will be handled with the utmost confidentiality. Information will only be shared on a need-to-know basis and in accordance with data protection laws. The safety of the young person will always take precedence over confidentiality.

Monitoring and Review

This policy will be reviewed annually or when there are changes to legislation, statutory guidance, or operational needs. Lessons from incidents or audits will be used to update this policy where needed.

Other Contact Information
Local Authority Safeguarding Contact: https://safeguardingchildren.stoke.gov.uk/homepage/46/about-us Children's advice and duty service (CHAD) on 01782 235100

Approval

This policy has been approved by The Spark Group's Senior Leadership Team.

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