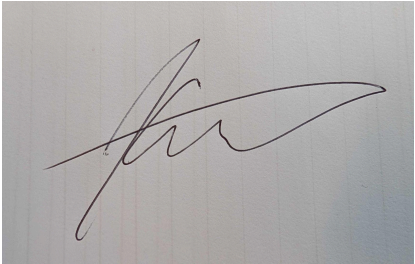
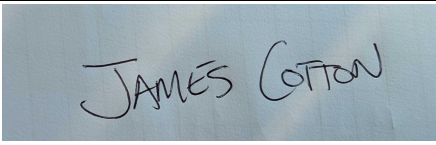


# Safeguarding and Prevent Policy

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Reviewed by	Tash Joslin (Director of Delivery)
Approved by	James Cotton (MD)
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Signed by	
Name Printed	

## 1. Introduction

iO-Sphere is passionate about safeguarding our Learners/Apprentices. We have a statutory duty to ensure that we safeguard and promote the welfare of children, young people and adults at risk of harm, but also a moral duty. Our duty under PREVENT to protect Learners/Apprentices from radicalisation is included in this policy. This policy and procedure focus on how we recruit and train our trainers and consultants, support our Learners/Apprentices, and deal effectively with allegations against staff.

The Safeguarding and Prevent Policy for iO-Sphere reflects the importance of our responsibility to safeguard and promote the welfare of all our Learners/Apprentices and staff by protecting them from physical, sexual, or emotional abuse, neglect, and bullying. We are committed to providing a caring, friendly, and safe environment for all our Learners/Apprentices so that they can learn in a relaxed and secure atmosphere. We believe every apprentice should be able to participate in all learning

and social activities in an enjoyable and safe environment and be protected from harm.

This policy is applicable to all staff, Learners/Apprentices, visitors, contractors, volunteers, service providers, subcontractors who may be working with children (those under 16), young adults (those aged 16-24) and vulnerable adults (as defined in section 59 of the Safeguarding Vulnerable Groups Act 2006 and/or those persons aged 18 and over who by reason of mental or any other disability, age or illness are or may be unable to look after themselves or are or maybe unable to protect themselves against harm or exploitation) whom iO-Sphere encounters through any of their programmes.

## 2. Purpose

- Identify the expectations of staff in relation to safeguarding
- Ensure relevant and effective safeguarding practices are in place
- Ensure the right of every applicant and apprentice to learn within a safe environment
- Promote awareness to staff of the need to safeguard children, vulnerable adults and all people and to recognise that safeguarding is everyone's responsibility
- Ensure that the fundamental rights and needs of our applicants and Learners/Apprentices are observed
- Prevent abuse through the pastoral support offered to all applicants and Learners/Apprentices
- Raise awareness of different types of abuse and children in need issues
- Provide guidelines for staff in handling matters relating to actual or suspected child abuse
- Ensure staff act professionally
- Deter potential, unsuitable individuals from applying to Professional Learners/Apprenticeships Ltd by demonstrating our attentiveness and vigilance in relation to safeguarding through our website and job advertisements
- Reject at interview stage anyone where we have doubts about suitability
- Prevent the risk of abuse by ensuring procedures and standards are in place

Throughout this policy and procedure, reference is made to 'children and young people'. This term is used to mean those under the age of 18 Safeguarding and promoting the welfare of children is defined as: protecting children from maltreatment; preventing impairment of children health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and action to enable all children to have the best outcomes (Keeping Children Safe in Education 2025)

Reference is made throughout to 'adults at risk of harm'. Adults at risk of harm are defined as people aged 18 years or over who may need or receive community care

services by reason of mental health or other disability, age or illness and who may be unable to take care of themselves or protect themselves against significant harm or exploitation (No Secrets, Department of Health. March 2000). The procedure will be applied, with appropriate adaptations to all Learners/Apprentices.

This policy has been created with reference to 'Working Together to Safeguard Children (2023), SET Procedures 2015, Counterterrorism and Security Act (2015), and Keeping Children Safe in Education (2025).

### 3. Radicalisation and Prevent

Radicalisation is defined as the act or process of making a person more radical or favouring of extreme or fundamental changes in political, economic, or social conditions, institutions or habits of the mind. Extremism is defined as the holding of extreme political or religious views. At iO-Sphere, we are fully committed to safeguarding and promoting the welfare of all Learners/Apprentices and staff. We recognise that safeguarding against radicalisation is no different from safeguarding against any other vulnerability. iO-Sphere is committed to providing and referring for early help to support learners and apprentices at risk.

At iO-Sphere, all employees are expected to uphold and promote the fundamental principles of British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs.

**The principal objectives of this policy are that:** All staff will understand what radicalisation and extremism are and why we need to be vigilant. All Learners/Apprentices and staff will know that iO-Sphere has policies in place to keep them safe from harm and that iO-Sphere regularly reviews its systems to ensure they are appropriate and effective.

iO-Sphere staff promotes respect, tolerance, and diversity. Learners/Apprentices and staff are encouraged to share their views and recognise that they are entitled to have their own different beliefs which should not be used to influence others. It is recognised that Learners/Apprentices or staff with low aspirations are more vulnerable to radicalisation and, therefore, we strive to equip our Learners/Apprentices and staff with confidence, self-belief, respect, and tolerance as well as setting high standards and expectations for themselves. In line with KCSIE 2025, iO-Sphere explicitly recognises and responds to the additional safeguarding vulnerabilities of LGBTQ+ learners, ensuring staff understand their responsibilities to identify, support, and protect LGBTQ+ learners who may face increased risks, in accordance with best practice guidance.

Learners/Apprentices and staff are briefed during induction and as part of ongoing standardisation and training; about how to stay safe when using the Internet and are encouraged to recognise that people are not always who they say they are online. They are taught to seek help if they are upset or concerned about anything they read or see on the Internet.

iO-Sphere has implemented filtering and monitoring systems to protect learners online and will regularly review their effectiveness. Inappropriate websites are banned and cannot be accessed from iO-Sphere premises. All staff will complete annual refresher training to ensure that they are clear about their role and the parameters of their responsibilities including their statutory safeguarding duties. Through various training opportunities within iO-Sphere, we ensure that our staff are current and fully aware of the threats, risks and vulnerabilities that are linked to radicalisation; are aware of the process of radicalisation and how this might be identified early on.

### **iO-Sphere will:**

- Provide a safe environment for children, young people, and adults at risk of harm to learn in
- Identify those who are suffering or are likely to suffer significant harm or who are at risk of radicalisation
- Have a system for identifying concerns in relation to abuse of adults at risk of harm and effective methods of responding to disclosures
- Refer concerns that a child, young person or adult at risk of significant harm or might be at risk of significant harm to the appropriate referral agents
- Work effectively with others as required by 'Working Together to Safeguard Children (2023)
- All staff are required to report and record low-level concerns that do not meet the harm threshold but indicate inappropriate behaviour or potential patterns of concern.
- Staff will consider wider environmental factors and circumstances when assessing safeguarding concerns and disclosures.
- Take into account the interagency safeguarding procedures of Norwich Safeguarding Children's Board.

## 5. Key Definitions

### Types of abuse and neglect

iO-Sphere uses the following as definitions of abuse for children, young people, and adults at risk of harm, and iO-Sphere operates a zero-tolerance operation on each of the below:

**Abuse:** a form of maltreatment. Somebody may abuse or neglect by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or child or children.

**Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness.

**Emotional abuse:** Emotional abuse is the persistent emotional maltreatment of a child or adult at risk of harm such as to cause severe and persistent adverse effects on their emotional development. It may involve conveying to them that they are worthless or unloved, inadequate, or valued only in so far as they meet the needs of another person. It may include not giving them opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed. These may include interactions that are beyond the developmental capability, as well as overprotection and limitation of exploration and learning, or preventing from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing victims to frequently to feel frightened or in danger, or the exploitation or corruption of others. Additionally, 'revenge porn' has been identified as a specific criminal offence (Criminal Justice and Courts Act 2015).

The Act creates a new criminal offence of disclosing private sexual photographs and films without the consent of an individual who appears in them and with intent to cause that individual distress. Some level of emotional abuse is involved in all types of maltreatment, though it may occur alone.

**Sexual abuse and harassment:** Sexual abuse involves forcing or enticing a child, young person, or adult at risk of harm to take part in sexual activities. It may not necessarily involve a high level of violence, whether or not the child or adult may not

be aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or 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 (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

**Peer on Peer/Child on Child Abuse:** Peer-on-peer abuse includes but is not limited to: physical and sexual abuse, sexual harassment and violence, emotional harm, on and offline bullying and teenage relationship abuse. Peer on peer and child on child-on-child abuse can be motivated by perceived differences e.g. on grounds of race, religion, gender, sexual orientation, disability or other differences. It can result in significant, long lasting, and traumatic isolation, intimidation, or violence to the victim.

**Up skirting:** Up skirting is specific criminal offence under the Voyeurism (Offences) Act 2019. It typically involves taking a photograph under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks for sexual gratification or causing humiliation, distress, or alarm. The revised version of Keeping Children Safe in Education lists up skirting as one example of peer-on-peer abuse.

**Sexual Consent:** Consent is an agreement between people to engage in a sexual activity. Consent means freely choosing to say 'yes' to a sexual activity. It's needed for any kind of sexual activity, from touching or kissing to intercourse. It's always clearly communicated - there should be no mystery or doubt. There are laws around who can consent and who can't. Without consent, any sexual activity is against the law and can be harmful.

**Neglect:** Neglect is the persistent failure to meet basic physical and/or psychological needs, likely to result in the serious impairment of health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing, and shelter (including exclusion from home or abandonment)
- protect from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate care-givers) or
- ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to basic emotional needs. This also applies to adults at risk of harm for whom neglect is an often under reported or challenged concern.

**Forced Marriage:** This involves a young person, or adult at risk of harm being forced into a marriage against their will.

**Child Sexual Exploitation:** Child sexual exploitation (CSE) is a form of sexual abuse that involves the manipulation and/or coercion of young people under the age of 18 into sexual activity in exchange for things such as money, gifts, accommodation, affection, or status. The manipulation or 'grooming' process involves befriending children, gaining their trust, and often feeding them drugs and alcohol, sometimes over a long period of time, before the abuse begins. The abusive relationship between victim and perpetrator involves an imbalance of power which limits the victim's options. It is a form of abuse which is often misunderstood by victims and outsiders as consensual. Although it is true that the victim can be tricked into believing they are in a loving relationship, no child under the age of 18 can ever consent to being abused or exploited (Barnardo's 2012).

**Children who run away or who are missing from home:** There are no exact figures for the number of children who go missing or run away, but estimates suggest that the figure is in the region of 100,000 per year. Children may run away from a problem, such as abuse or neglect at home, or to somewhere they want to be. They may have been coerced to run away by someone else. Whatever the reason, it is thought that approximately 25 per cent of children and young people that go missing are at risk of serious harm. There are particular concerns about the links between children running away and the risks of sexual exploitation. Missing children may also be vulnerable to other forms of exploitation, to violent crime, gang exploitation, or to drug and alcohol misuse.

Although looked after children are particularly vulnerable when they go missing, the majority of children who go missing are not looked after and go missing from their family home. They can face the same risks as a child missing from local authority care.

**Gang Culture/County Lines:** County lines is a form of criminal exploitation where urban gangs persuade, coerce or force children and young adults to store drugs and money and/or transport them to suburban areas, market towns and coastal towns (Home Office, 2018). It can happen in any part of the UK and is against the law and a form of child abuse.

Children and young people may be criminally exploited in multiple ways. Other forms of criminal exploitation include child sexual exploitation, trafficking, gang and knife crime.

**Child Trafficking:** is a form of abuse. It involves the recruiting, moving, receiving, and harbouring of children with purpose of exploiting them (HH Department for Education, 2011) Child trafficking is a form of modern slavery. Children are trafficked for:

- Sexual exploitation
- Criminal activity
- Moving drugs
- Benefit fraud
- Selling pirated goods
- Forced marriage
- Domestic servitude
- Forced labour
- Illegal adoption
- Unreported private fostering

**Domestic Violence:** The Home Office defines domestic violence as, "Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 years old or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse:

- Psychological
- Physical
- Sexual
- Financial
- Emotional

**Controlling behaviour:** is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour. Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim. Children who live in households where domestic violence is taking place are seen to be highly vulnerable. There are other forms of abuse or behaviour that put children at risk; the links below provide useful information.

**Female Genital Mutilation:** This comprises all procedures that involve partial or total removal of the external female genitalia, or other injury to the female genital organs for nonmedical reasons.

**Radicalisation:** Some young people and adults at risk of harm may be vulnerable to radicalisation for the purpose of violent extremism. Concerns regarding radicalisation will be referred to Channel which is a multi-agency panel who will offer guidance and support with the aim of preventing activity which could be deemed as criminal.

**Financial or Material Abuse:** This applies to largely adults at risk of harm and relates to circumstances where trust in relation to financial matters is abused. Includes theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions, or benefits.

**Bullying:** Bullying someone because of their age, race, gender, sexual orientation, disability and/or transgender will not be tolerated as iO-Sphere operates a zero-tolerance approach. Bullying of this nature is also against the law. Bullying can take many forms and includes:

- Emotional: Being excluded, tormented (e.g. hiding things, threatening gestures)
- Physical: Pushing, kicking, punching or any use of aggression and intimidation
- Racial: Racial taunts, use of racial symbols, graffiti, gestures –
- Sexual: Unwanted physical contact, sexually abusive comments including homophobic comments and graffiti
- Verbal: Name calling, spreading rumours, teasing
- Cyber: All areas on internet, such as email and internet, chat room misuse. Mobile threats by text message and calls. Misuse of associated technology i.e. camera and video facilities, sexting.
- Online: Online abuse is any type of abuse that happens on the web, whether through social networks, playing online games or using mobile phones. Children and young people and adults may experience cyberbullying, grooming, sexual abuse, sexual exploitation, emotional abuse, financial abuse, or identity fraud.

**Cyberbullying** involves the use of electronic communication devices to bully people. These include mobile phones, tablets, iPods, laptops and PCs. Social media platforms such as Facebook, Instagram, Twitter and WhatsApp are used by cyberbullies to put out their communications. Who is most at risk? Children using social media

unsupervised. Vulnerable adults are particularly at risk if they are using social media, as they may be more emotionally and mentally susceptible to the abuse.

- **Flaming:** Online fights usually through emails, instant messaging or chat rooms where angry and rude comments are exchanged.
- **Denigration:** Putting mean online messages through email, instant messaging, chat rooms, or websites set up to make fun of someone.
- **Exclusion:** Intentionally leaving someone out of a group such as instant messaging, friend sites, or other online group activities.
- **Outing:** Sharing secrets about someone online including private information, pictures, and videos.
- **Impersonation:** Tricking someone into revealing personal information then sharing it with others.
- **Harassment:** Repeatedly sending malicious messages to someone online.
- **Cyberstalking:** Continuously harassing and denigration including threats of physical harm.

To reiterate, iO-Sphere operates a zero-tolerance policy against all types of abuse.

## 6. Recruitment and Selection

iO-Sphere aims to recruit and develop skilled and motivated staff who will deliver an outstanding service to the local community. An effective recruitment and selection process is a major contributor to this aim. iO-Sphere is committed to safeguarding and promoting the welfare of children and adults at risk of harm and expects its staff to share this commitment.

The Disclosure and Barring Service (DBS) was introduced on 1 December 2012, through the Safeguarding Vulnerable Groups Act 2006 and Protection of Freedoms Act 2012. Its purpose is to reduce the risk of harm to children and vulnerable adults. All members of staff, consultants and trainers working in settings with children, young people or vulnerable adults, present on site, must have a current DBS (within 3 years) and submit a copy to the Designated Safeguarding Officer. All members of staff, consultants and trainers working in settings with children, young adults or vulnerable adults, present on site, must have completed PREVENT and safeguarding in the last year. This will be checked as part of occupational competency.

**The Safeguarding Children and Safer Recruitment in Education** guidance which came into force on 1st January 2011, recommends that in addition to the various staff records which are kept as part of normal business, iO-Sphere will keep and maintain a

single central record of recruitment and vetting checks. (Last updated 26 April 2012). iO-Sphere will apply principals of Safer Recruitment to staff working with children, young adults and adults at risk of harm as part of their Learners/Apprenticeships. It will be the employer/workplace's responsibility to ensure that their staff and volunteers have the relevant DBS disclosures. iO-Sphere will not undertake DBS checks for Learners/Apprentices. All staff who participate in the recruitment process are required to undergo recruitment and selection process training. In addition, every interview panel must have at least one member who has received Safer Recruitment training.

Whilst it is a criminal offence to knowingly employ someone who is barred from working with children or adults at risk of harm in regulated activity, it is possible to allow such a person to work in controlled activity, subject to specific safeguards being in place. The decision whether to employ in controlled activity someone who is barred from working with children or adults at risk of harm in regulated activity will be made by the Directors of iO-Sphere. iO-Sphere reserves the right to take up references for all members of staff, consultants, or trainers. All members of staff, consultants and trainers working in settings with children, young people, or vulnerable adults, present on site, must have two references.

See Recruitment and Selection Policy for more detail.

## 7. PREVENT

iO-Sphere strongly believes in and adheres to the governments prevent strategy laid out in the 2015 Counter Terrorism and Security Act and the duty it places on training providers. This is as per paragraph 114 of the Counter-terrorism strategy (CONTEST) 2018.

All Learners/Apprentices engaging with iO-Sphere in any way will undertake an induction session at our training which is to include but not exclusively; health and safety in the workplace, awareness of safeguarding and British values and prevent. It is our aim to set core values that are for all stakeholders, the SLT have our set parameters embedded into our expectations for staff. We view British values of paramount importance, underpinning what it is to be a citizen in a modern & diverse Great Britain. As well as actively promoting these values to our Learners/Apprentices, we embed our strategy across the full learner/apprentice journey, staff promote it through their delivery & embed safeguarding naturally with Learners/Apprentices.

Leaders & Managers champion 'Prevent' & 'Safeguarding', leading strongly on ensuring that these points are discussed in a variety of forums & relevant communication & promotions are a regular feature. We actively promote all forms of equality & foster greater understanding of & respect for people of all faiths (or those of no faith), races, genders, ages, disabilities & sexual orientations.

### **The Prevent Strategy will specifically:**

- Respond to the ideological challenge of terrorism and the threat we face from those who promote it
- Prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support and work with sectors and institutions where there are risks of radicalisation which we need to address.

CONTEST is the Government's Counter Terrorism Strategy, published in July 2006 and refreshed in March 2009. The aim of the strategy is 'to reduce the risk from international terrorism, so that people can go about their lives freely and with confidence.' CONTEST has four strands, often known as the four Ps. The aims of the 4 Ps are:

- PREVENT - to stop people becoming terrorists or supporting violent extremism
- PURSUE - to stop terrorist attacks through disruption, investigation and detection
- PREPARE - where an attack cannot be stopped, to mitigate its impact
- PROTECT - to strengthen against terrorist attack, including borders, utilities, transport infrastructure and crowded places.

### **What is Extremism?**

The Government has defined extremism as "vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs". This also includes calls for the death of members of the British armed forces.

### **What is Terrorism?**

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 of 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.

## What is Radicalisation?

People can be drawn into violence or they can be exposed to the messages of extremist groups by many means. The risk of radicalisation is the product of a number of factors and identifying this risk requires that staff exercise their professional judgement, seeking further advice as necessary. It may be combined with other vulnerabilities or may be the only risk identified. Potential indicators include:

- Use of inappropriate language
- Possession of violent extremist literature
- Behavioural changes
- The expression of extremist views
- Advocating violent actions and means
- Association with known extremists
- Seeking to recruit others to an extremist ideology

The Government has defined extremism as "vocal or active opposition to fundamental British Values", which include:

- Individual liberty
- Rule of law
- Democracy
- Mutual respect and tolerance of different faiths and beliefs.

This includes not discriminating against those with protected characteristics (Equality Act 2010), namely:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion and belief
- Sex
- Sexual orientation

## Channel

Channel is an early intervention multi-agency process designed to safeguard vulnerable people from being drawn into violent extremist or terrorist behaviour. Channel works in a similar way to existing safeguarding partnerships aimed at protecting vulnerable people. Channel is designed to work with individuals of any age

who are at risk of being exploited by extremist or terrorist ideologies. The process is shaped around the circumstances of each person and can provide support for any form of radicalisation or personal vulnerabilities. Each Channel Panel is chaired by a Local Authority and brings together a range of multi-agency partners to collectively assess the risk and can decide whether a support package is needed. The group may include statutory and non-statutory partners, as well as lead safeguarding professionals. If the group feels the person would be suitable for Channel, it will look to develop a package of support that is bespoke to the person. The partnership approach ensures those with specific knowledge and expertise around the vulnerabilities of those at risk are able to work together to provide the best support. Channel interventions are delivered through local partners and specialist agencies. The support may focus on a person's vulnerabilities around health, education, employment or housing, as well as specialist mentoring or faith guidance and broader diversionary activities such as sport. Each support package is tailored to the person and their particular circumstances. A person will always be informed first if it's felt that they would benefit from Channel support. The process is voluntary, and their consent would be needed before taking part in the process. This process is managed carefully by the Channel Panel. Anyone can make a referral. Referrals come from a wide range of partners including education, health, youth offending teams, police and social services. This policy relates to all Staff and Learners/Apprentices and Stakeholders. iO-Sphere Designated officers in relation to Prevent are:

Lisa Symons (safeguarding@io-sphere.io)  
Greg Simon (safeguarding@io-sphere.io)

### **Martyns Law**

On Monday 19 December, the Government announced details for the Protect Duty, now to be known as 'Martyn's Law' in tribute of Martyn Hett, who was killed alongside 21 others in the Manchester Arena terrorist attack in 2017. There have been 14 terror attacks in the UK since 2017. These tragic attacks have caused deaths and casualties amongst people going about their everyday lives. The terrorist threat we currently face is multifaceted, diverse, and continually evolving.

As such, it remains difficult to predict which locations could be targeted by terrorists with attempts being harder to spot and harder to stop. iO-Sphere recognise need to improve security and ensure robust, proportionate, and consistent measures at public places to make sure we can better prepare and improve public security, in light of possible future attacks. We are aware through engagement with industry that, without legal compulsion, counter terrorism security efforts often fall behind legally required activities. The prioritisation, consideration and application of security processes and measures is currently inconsistent.

## What will Martyn's Law do?

Martyn's Law will keep people safe, enhancing our national security and reducing the risk to the public from terrorism by the protection of public venues. It will place a requirement on those responsible for certain locations to consider the threat from terrorism and implement appropriate and proportionate mitigation measures. The legislation will ensure parties are prepared, ready to respond and know what to do in the event of an attack. Better protection will be delivered through enhanced security systems, staff training, and clearer processes.

This law will impose a duty on the owners and operators of certain locations to increase their preparedness for and protection from a terrorist attack by requiring them to take proportionate steps, depending on the size and nature of the activities that take place there.

Proportionality is a fundamental consideration for this legislation.

It will therefore establish a tiered model, linked to the activity that takes place at a location and its capacity:

- A standard tier will drive good preparedness outcomes. Duty holders will be required to undertake simple yet effective activities to improve protective security and preparedness. This will apply to qualifying locations with a maximum capacity of over 100. This could include larger retail stores, bars, or restaurants.
- A higher tier will see additional requirements placed on high-capacity locations in recognition of the potential catastrophic consequences of a successful attack. This will apply to locations with a capacity of over 800 people at any time.

The training centre falls within the scope of Martyn's Law where "qualifying activities" take place. This will include locations for purposes such as entertainment and leisure, retail, food and drink, museums and galleries, sports grounds, public areas of local and central Government buildings (e.g., town halls), visitor attractions. iO-Sphere feel it is important to consider this when making proactive efforts to safeguarding its staff and Learners/Apprentices.

## 8. Roles and Responsibilities

Our Designated Safeguarding Officer is Lisa Symons: fully supported by our experienced safeguarding team detailed on the following page who are also available to support all individuals experiencing safeguarding or prevent concerns.

The Designated Safeguarding Officer has a key duty to take lead responsibility for raising awareness across all employees relating to the welfare of children and young people in the Company and of overseeing the referral of cases of suspected abuse or allegations.

Employees must remain vigilant at all times of the risk to clients of abusive behaviour from different sources including members of their family, other clients and employees. Any suspicion, allegation or incident of abuse, employees must be referred to a line manager (or another manager if appropriate) for full investigation.

If the alleged perpetrator of abuse is another employee, the circumstances will be investigated fully under the Company's Disciplinary Procedure. If it is agreed to be a safeguarding matter a written record of the date and time of the report will be made including the name of the person to whom the matter is reported and sent to the Designated Safeguarding Officer within 24 hours.

### **Designated Staff with Responsibility for Protection from Abuse**

In all cases where allegations are made against people who may constitute part of the children's workforce, iO-Sphere will consult with the Local Authority Designated Officer (LADO) in retrospect with their area.

They will offer advice regarding appropriate next steps in relation to referral and investigation and ensure that all cases are handled in accordance with safeguarding procedures.

London LADO: LADO@cityoflondon.gov.uk Tel: 07795 090649

### **Governance**

In line with KCSIE 2025, iO-Sphere confirms that safeguarding and Prevent are overseen by the Board, with a designated safeguarding governor providing challenge and support to ensure the effectiveness of safeguarding arrangements. The DSL provides regular safeguarding reports to the Board, ensuring governors have oversight of trends, training compliance, and case management. The Board ensures

that this policy is reviewed at least annually, or sooner if legislation or local safeguarding arrangements change, to maintain the highest standards of safeguarding practice across the organisation.

## 9. Contact Information

For any safeguarding concerns or queries, please contact:

Designated Safeguarding Lead (DSL): Lisa Symons (safeguarding@io-sphere.io)

Deputy DSL: Greg Simon (safeguarding@io-sphere.io)

All staff (as a minimum) are Level 2 ETF Safeguarding and PREVENT trained and trained mental health first aiders (Qual safe accredited).

### Responsibilities include:

- Ensuring safeguarding and wellbeing concerns are recorded using Safeguarding and Wellbeing Form
- Ensuring cases of suspected abuse or allegations are appropriately referred to relevant agencies
- Providing advice and support to staff, consultants and trainers on issues relating to safeguarding
- Ensuring all records of any safeguarding referral, complaint or concern is kept, (even where that concern does not lead to a referral)
- Ensuring all staff, consultants, trainers and Learners/Apprentices have access to the Safeguarding and Prevent Policy
- Ensuring safer recruitment practices are in place
- Ensuring Safer Recruitment guidelines are applied to Learners/Apprentices applying to courses which give access to working with children, young people and adults at risk of harm
- Ensuring identification badges are issued to staff, consultants, trainers.

### Responding to Disclosure:

- Abused children, young adults and vulnerable adults are more likely to disclose details of abuse to someone they trust and whom they feel safe with.
- By listening and taking seriously what the child, young people or vulnerable adult is saying you are already helping the situation. The following points are a guide to help you respond appropriately.

## **Actions to be taken by the person being disclosed to:**

- React calmly so as not to frighten them
- Avoid asking direct questions other than those seeking to clarify your understanding of what the person has said, they may be formally interviewed by the correct authority, and they should not have to repeat their account on several occasions. (Inappropriate and excessive questioning at an early stage may also impede the conduct of a criminal investigation)
- Take what the person is saying seriously, recognising the difficulties inherent in interpreting what is being said by a person who has a speech impairment or differences in language.
- Tell them they were not to blame, and they were right to tell someone.
- Reassure the child, young person or vulnerable adult but do not make promises of confidentiality which will not be feasible in the light of the developments. Explain to them that you will have to share your concerns with the Designated Safeguarding Officer who has the authority to act.
- Record in writing on the [Safeguarding Incident Report Form](#) all the details that you are aware of and what was said using the child, young adult or vulnerable adults' own words immediately.

## **Reporting - How to deal with suspicions/concerns of abuse or neglect**

Key things to remember if a child, young adult or adult at risk of harm tells you about possible abuse:

- Never promise confidentiality – you will have to break it, and with it the persons trust in you
- Listen carefully and stay calm – you need to listen without making assumptions or judgements
- Do not interview a child, young adult or vulnerable adult at risk of harm. Question normally and without pressure and only to be sure that you understand what you have heard. Never ask leading questions or act as an investigator. Do not put words into their mouth
- Reassure them that by telling you, they have done the right thing
- Inform them that you must pass the information on, but that only those that need to know about it will be told. Inform them of to whom you will report the matter to the Designated Safeguarding Lead.
- Find out what the child or adult at risk of harm would like to happen, but make them aware that you may have to act against their wishes (e.g. they may ask you not to disclose to anyone else). For Learners/Apprentices under the age of 18; wishes regarding action to be taken will be noted, where possible. However,

the learner will be made aware that this will not affect the final decision to make a referral

- Note the main points carefully
- Use the Safeguarding and Wellbeing Form (Annexe 3), to gather key information and as a record of your discussion
- Do not investigate concerns or allegations yourself, but report them immediately to a Designated Safeguarding Officer
- Adult Learners/Apprentices have the right to make their own choices where they are capable of doing so.

### **Confidentiality**

Every effort should be made to ensure that confidentiality is maintained for all concerned in the safeguarding of children, young adult and vulnerable adults. Information should be handled and disseminated on a need-to-know basis only. This includes the following people:

- A Designated Child/Adult Safeguarding Officer
- The parents or carers of the person who is alleged to have been abused
- Police/Social Care Services
- Senior Management where appropriate
- The person making the allegation
- The alleged abuser (and parents or carers if the abuser is a child or young person)

### **Reporting FGM**

Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act 2003 ("the 2003 Act"). It is a form of child abuse and violence against women. FGM comprises all procedures involving partial or total removal of the external female genitalia for non-medical reasons.

The FGM mandatory reporting duty is a legal duty provided for in the FGM Act 2003 (as amended by the Serious Crime Act 2015). The legislation requires regulated health and social care professionals and teachers in England and Wales to make a report to the police where, in the course of their professional duties, they either:

- Are informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act

was necessary for the girl's physical or mental health or for purposes connected with labour or birth

For the purposes of the duty, the relevant age is the girl's age at the time of the disclosure/identification of FGM (i.e. it does not apply where a woman aged 18 or over discloses, she had FGM when she was under 18). Complying with the duty does not breach any confidentiality requirement or other restriction on disclosure which might otherwise apply. The duty is a personal duty which requires the individual professional who becomes aware of the case to make a report; the responsibility cannot be transferred. The only exception to this is if you know that another individual from your profession has already made a report; there is no requirement to make a second.

Reports under the duty should be made as soon as possible after a case is discovered, and best practice is for reports to be made by the close of the next working day, unless any of the factors described below are present. You should act with at least the same urgency as is required by your local safeguarding processes.

iO-Sphere links up with local and relevant organisations, this allows us to make immediate referrals when necessary. For example, Ripples Wellbeing in Norwich can offer remote and immediate counselling, face to face therapy sessions, provide training for staff, employers, and Learners/Apprentices (mental health first aider) and emotional support and guidance to people in need.

A longer timeframe than the next working day may be appropriate in exceptional cases where, for example, a professional has concerns that a report to the police is likely to result in an immediate safeguarding risk to the child (or another child, e.g. a sibling) and considers that consultation with colleagues or other agencies is necessary prior to the report being made. If you think you are dealing with such a case, you are strongly advised to consult colleagues, including your designated safeguarding lead, as soon as practicable, and to keep a record of any decisions made. It is important to remember that the safety of the girl is the priority.

### **Concerns about individuals who are not Learners/Apprentices with iO-Sphere**

For young people who are not Learners/Apprentices iO-Sphere, the referral must go back to the head of the organisation to which they are attached. The contact can be made direct or via the Safeguarding Lead if they are on site. Where there is no organisational contact available, the referral will be made direct to Children's Services. If there is a concern about a workplace this should be recorded on the Safeguarding and Wellbeing Form and reported immediately to a Designated Safeguarding Officer.

## Reporting and Dealing with Allegations of Abuse against Members of Staff

The procedures apply to all staff, consultants, and trainers whether teaching, administrative, management or support. Allegations of abuse against a member of staff can be defined as when a person has:

- Behaved in a way that has harmed or may have harmed a child, young person or adult at risk of harm
- Possibly committed a criminal offence against or related to a child, young person or adult at risk of harm
- Behaved towards a child, young person, or adult at risk of harm in a way that indicates she/he is unsuitable to work with children, young people or adults at risk of harm.

Following an allegation of abuse against a member of staff, consultant or trainer, the Designated Safeguarding Officer would inform the appropriate authority (LADO, Police, etc). The member of staff, consultant or trainer would either be suspended or not offered any further work until the outcome of the allegation is confirmed.

Trainers must inform a DSL if an under-18 or vulnerable learner/apprentice does not show up to a: session, 1-2-1 or review that they have booked, immediately. The DSL will then contact the apprentice and obtain reasoning for their absence. The DSL will make contact within 30 minutes of the report – if unsuccessful in contacting the learner/apprentice, their emergency contact will be contacted to ensure the safety and wellbeing of the learner/apprentice.

For an over-18 learner/apprentice, after the first missed session, attempt to contact the adult through their preferred communication method to offer support by their designated coach. This might include checking if they are facing difficulties preventing them from attending. If there is no response after multiple attempts and attempted use of secondary channels, their designated coach will document these efforts and escalating the matter to the DSL to follow up. If no contact is made, the DSL will contact emergency contact.

Ref:

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

## 10. Chanel Contacts

**Please see Annexe 1** – List of Channel contacts. Sources and Legislation

1. Criminal Justice and Courts Act 2015  
<https://www.legislation.gov.uk/ukpga/2015/2/contents/enacted>
2. FGM Act 2003  
<https://www.gov.uk/government/publications/female-genital-mutilation-resource-pack/female-genital-mutilation-resource-pack/female-genital-mutilation-resource-pack>
3. HH Department for Education  
<https://www.gov.uk/government/organisations/department-for-education>
4. Serious Crime Act 2015  
<https://www.legislation.gov.uk/ukpga/2015/9/contents/enacted>
5. Safeguarding Vulnerable Groups Act 2006  
<https://www.legislation.gov.uk/ukpga/2006/47/contents>
6. Protection of Freedom Act 2012  
<https://www.legislation.gov.uk/ukpga/2012/9/contents/enacted>
7. Counter Terrorism and Security Act 2015  
<https://www.gov.uk/government/collections/counter-terrorism-and-security-bill>
8. Counter Terrorism Strategy (CONTEST) 2018  
<https://www.gov.uk/government/publications/counter-terrorism-strategy-contest-2018>
9. Working Together to Safeguard Children 2023  
<https://www.gov.uk/government/publications/working-together-to-safeguard-children-2>

## 12. Review

iO-Sphere will approve and review policies and procedures:

- Ensuring systems are in place and effective in relation to the identification of children, young people and adults at risk of harm, and procedures for reporting concerns are widely known
- Ensuring effective procedures for reporting and dealing with allegations of abuse by members of staff or others who come into contact with Learners/Apprentices
- Ensuring safe recruitment of staff



- Ensuring staff are appropriately trained to discharge their duties in relation to safeguarding and PREVENT
- In developing policies and procedures, iO-Sphere will take account of guidance issued by the Department for Education, Ofsted and other relevant bodies and groups including Norwich Local Safeguarding Children Board

### Version Control

Version: V2

Last Review Date: June 2025

Next Review Date: June 2026



## Safeguarding Councils List

### Annexe 1

City of London Corporations

**Tel:** 07795 090649

**Website:** [Children and Families Services](#)

**Email:** [LADO@cityoflondon.gov.uk](mailto:LADO@cityoflondon.gov.uk)

## Prevent Police List

### Annexe 2

City of London Police

**Tel:** 020 7601 2442

**Website:** [Prevent](#)

**Email:** [prevent@cityoflondon.police.uk](mailto:prevent@cityoflondon.police.uk)

### Annexe 3:

## Safeguarding and Wellbeing Form

Employee logging issue:
Name of Apprentice:
ILR Number:
Date Raised:
Date Closed:
Outcome:

Details of Safeguarding and Wellbeing Issue

Details of Investigation