# SPR51.4 Springpod Safeguarding policy v1.4 01.05.25

## 1. Purpose

Safeguarding is taken extremely seriously by Springpod and is the primary consideration when developing new features and functionality.

Springpod is committed to safeguarding and promoting the welfare of all young people using its services. We recognise that young people may be especially vulnerable to abuse. Young people who are abused or neglected may find it challenging to develop a sense of self-worth and view the world positively.

We recognise that young people who have experienced abuse may harm others. We will always take a considered and sensitive approach to supporting the young people using our services.

This policy aims to safeguard and promote the welfare of the young people using our services by protecting their welfare, safety, and health by fostering an honest, open, caring, and supportive climate. Young people's welfare is of paramount importance.

This policy sets out the approach to safeguarding:

- To protect young people and young people who receive Springpod's services from harm. This includes the children of adults who use our services.
- To provide staff, volunteers, young people, and their families with the overarching principles guiding our child protection approach.

In addition to the guidance, this policy is based on the following legislation:

- The ICO's Age-Appropriate Design Code (AADC), which is sometimes referred to as the Children's Code.
- the young people act 1989 (and 2004 amendment), which supplies a framework for the care and protection of young people
- the rehabilitation of offender's act 1974, which outlines when people with criminal convictions can work with young people
- statutory guidance on the Prevent duty, which explains the responsibilities under the counterterrorism and security act 2015 concerning protecting people from the risk of radicalisation and extremism

The **designated safeguarding lead** is Kieran Morgan-McGeehan, Head of Operations.
He can be contacted confidentially by email to Kieran.morgan-mcgeehan@springpod.com, slack message, or personal mobile phone on 07528 705 481.

## 2. Scope

This version-controlled document is applicable to all entities operating under the Springpod brand, including Springpod Holdings Ltd, Springpod Inc., and The Education Hub Group Ltd trading as Springpod. It encompasses all employees, contractors, consultants, temporary staff, and any third parties engaged in activities on behalf of these entities.
The provisions within this document are binding across all operational jurisdictions and apply to all business functions, processes, and systems managed or overseen by the entities. This ensures a consistent and unified approach to governance, compliance, and operational excellence throughout the organisation.

## 3. Risk appetite

We have no appetite for impact on our business resulting from safeguarding issues.
We also have no appetite for impact on users or third parties caused by safeguarding issues.

## 4. Policy statement

### 4.1. Main elements

There are four main elements to our safeguarding/child protection policy:

- **Prevention** (e.g., Positive atmosphere and support to young people, safer recruitment procedures).
- **Protection** (by following agreed procedures, ensuring employees are trained and supported to respond appropriately and sensitively to child protection concerns).
- **Support** (to third parties, employees and young people who may have been harmed or abused).
- **Working with third parties** (to ensure appropriate communications and actions are undertaken).

### 4.2. Safeguarding commitment

We believe that:

- Young people and young people should never experience abuse of any kind
- We have a responsibility to promote the welfare of all young people and young people, keep them safe, and practise in a way that protects them.

Springpod is committed to ensuring that our platform and services:

- Keeps children safe from exploitation risks, including the risks of commercial or sexual exploitation and sexual abuse.
- Protecting and supporting children's health and wellbeing.
- Protecting and supporting children's physical, psychological and emotional development.
- Protecting and supporting children's need to develop their views and identity.
- Protecting and supporting children's right to freedom of association and play.
- Supporting the needs of children with disabilities under the relevant equality legislation.
- Recognising the role of parents or the holder of parental authority in protecting and promoting the best interests of the child and supporting parents in this task, and
- recognising the evolving capacity of the child to form their view and give due weight to that view.

As Springpod works with young people and adults, we combine the six principles of adult safeguarding, as listed in the care act 2014, and the two fundamental principles of young people's safeguarding, given by working together 2018, into our general working practices.

#### 4.2.1. The six principles of safeguarding

First introduced by the Department of Health in 2011 but now embedded in the Care Act, these six principles apply to all health and care settings:

- **1. Empowerment**
  People being supported and encouraged to make their own decisions and informed consent
- **2. Prevention**
  It is better to act before harm occurs.
- **3. Proportionality**
  The least intrusive response appropriate to the risk presented.
- **4. Protection**
  Support and representation for those in greatest need.
- **5. Partnership**
  Local solutions through services collaborating with their communities. Communities have a part to play in preventing, detecting, and reporting neglect and abuse.
- **6. Accountability**
  Accountability and transparency in safeguarding practice

We recognise that:

- The welfare of young people is paramount in all the work we do and our decisions.
- All young people, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation, have an equal right to protection from harm or abuse.
- Some young people are additionally vulnerable because of the impact of earlier experiences, their level of dependency, communication needs or other issues.
- Working in partnership with young people, young people, parents, carers, and other agencies is essential in promoting young people's welfare.

For this policy, safeguarding and promoting the welfare of young people is defined as:

- Protecting young people from maltreatment.

- Preventing impairment of young people's mental and physical health or development.
- Ensuring that young people grow up in circumstances consistent with the provision of safe and effective care; and
- Enabling all young people to have the best outcomes.

Springpod adopts an open and accepting attitude towards young people as part of its responsibility. We encourage young people and parents to talk openly about any concerns and to Springpod as a safe place when there are difficulties. Young people's worries and fears will be taken seriously, and young people are encouraged to seek help as appropriate.

### 4.3. Safeguarding measures

#### 4.3.1. Encouraging a safe culture

To ensure the safety of young people, we will:

- Establish and keep an ethos where young people feel secure and are encouraged to talk and are listened to.
- Ensure that young people know that there are adults they can approach if they are worried or in difficulty.
- Ensure every effort is made to set up effective working relationships with clients, teachers, and parents.
- Operate safer recruitment procedures and ensure all proper checks are conducted, including identity, right to work, enhanced DBS criminal record, barred list (and overseas where needed), and employment references.

#### 4.3.2. Limited and explicit data collection

All data collection is clearly outlined and kept to a minimum, with students/users keeping the right to remove their information.
All data is stored according to our terms of use and privacy policy.
If data is shared with third parties, this is made clear to the users during data capture. Advice is offered on specific features, around only supplying necessary information.

#### 4.3.3. Controlled interactions

Unsupervised 1-2-1 interactions must not occur between a young person and a person who has not been adequately trained, screened, and approved by Springpod to carry out such an interaction. Screening shall include DBS checking and other background checks as appropriate.
If an interaction is supervised, this must only occur where the supervisor has been adequately trained, screened, and approved by Springpod to carry out such an interaction.

Students can ask questions and receive advice from company representatives through various features on Springpod.

- Our live chat is anonymised and monitored solely by the Springpod team
- In programme, communication comes from our trained staff, rather than through employers
- A member of the Springpod team moderates all live webinars and community interactions. This includes moderating community features, liver chats, webinars, and the public Q&A feature for profanity and contact details (our admins must actively publish messages to appear to speakers/other users). Private chat features are not allowed on webinars.
- Live webinars are one-way only for video and audio - students/users will not appear on screen or have access to a microphone. Their only means of communication is via the Q&A feature.
- Parental consent is needed for students under 13 years old to participate in the programmes.

#### 4.3.4. Limited access to data

Access to students' data is limited to employees that require it.

#### 4.3.5. Employee awareness

All Springpod employees receive safeguarding training.

#### 4.3.6. Collaborating with clients and educational institutions

Springpod performs a central role in providing services on behalf of clients and educational institutions, so Springpod needs to ensure that clients and educational institutions we work with understand their responsibility to ensure the safety of young people.

#### 4.3.7. Support for staff

As part of their duty to safeguard and promote the welfare of young people and young people, employees may hear information, either from the child/young person as part of disclosure or from another adult, that will be upsetting. When a staff member is distressed because of dealing with a child protection concern, they should, in the first instance, speak to the designated safeguarding lead about the support they require. The designated safeguarding lead should look to arrange the necessary support.
The designated safeguarding lead is Kieran McGeehan, Risk & Compliance Officer.

#### 4.3.8. Reporting and managing safeguarding issues

All safeguarding issues must be reported to the designated safeguarding lead immediately. It is up to the designated safeguarding lead to take appropriate action and report the issue using Springpod's Risk and Compliance management system.

### 4.4. Compliance

Compliance with this policy will be audited through various methods, including periodic training, video monitoring, business reports, internal and external audits, and feedback to the policy owner.
An employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

### 4.5. Exceptions

Any exception to the policy must be approved by the chief operations officer (COO) in advance, either by consultation or by delegated authority following the risk management framework.

## 5. Roles and responsibilities

### 5.1. The first line of defence (everyone) is responsible for:

- Ensuring their day-to-day business activity falls in line with this policy.
- Ensuring their business area is compliant with this policy.
- Reporting any actual or perceived breaches.

### 5.2. The second line of defence (the management) is responsible for:

- Oversight of policy implementation.
- Acting as an independent, effective challenger of the first line.

### 5.3. The third line of defence (risk & compliance officer) is responsible for:

- Assuring that the policy meets all regulatory requirements and is being complied with effectively.
- Reviewing and approving this policy.
- Developing and supplying training on this policy and associated standards, tools, methodologies, and programmes.
- Supplying advice and guidance to staff implementing the policy.

### 5.4. The Board of Directors is responsible for:

Approval of this policy

## 6. Document review

This document will be reviewed at least annually or as needed if significant changes occur in the business structure, responsibilities, or regulatory framework.

## 7. Related documents

- Risk management policy
- Risk management framework
- Whistleblowing policy

- Safeguarding guidance for clients

## 8. Document version history

| Date | Author | Version | Notes |
|---|---|---|---|
| Feb 2021 | **Tom Hyams**<br>Chief operations officer | 0.1 | Retired May 2021 |
| May 2021 | **Kieran McGeehan**<br>Risk & compliance officer | 1.2 | Updated and rebranded |
| May 2022 | **Kieran Morgan-McGeehan**<br>Head of Operations | 1.3 | Reviewed and updated |
| 01.05.25 | **Kieran Morgan-McGeehan** | 1.2 | Reviewed |