

Safeguarding Policy

Document Control:

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1. Policy Statement and Statutory Framework

1.1 Multiverse Group Limited (Multiverse, our) is committed to the safety and wellbeing of all learners, staff, and visitors. Multiverse recognises and is dedicated to fulfilling its statutory duties to safeguard all children and adults at risk. Multiverse may encounter individuals from these groups through its apprenticeship programmes, and will take all reasonable steps to ensure the provision of a safe environment, conducive to work, study, and the enjoyment of a positive experience for all members of its community.

1.2 This policy and related procedures have been drawn up based on law and guidance:

- Keeping Children Safe in Education Statutory Guidance 2025
- Working Together to Safeguard Children Statutory Guidance 2023
- Health and Safety at Work Act 1974
- Care Act 2014
- Sexual Offences Act 2003
- Equality Act 2010
- Mental Capacity Act 2005
- Domestic Abuse Act 2021
- General Data Protection Regulation as enacted by the Data Protection Act 2018
- Safeguarding Vulnerable Groups Act 2006
- Children Act 1989 and 2004
- Counter Terrorism and Security Act 2015
- Prevent Statutory Duty guidance April 2021
- Modern Slavery Act 2015
- Education Act 2002
- Online Safety Act 2023

Multiverse commits to monitoring any changes to the applicable law or guidance as detailed in this section 1.2 to ensure that it continues to meet its legal obligations.

2. Scope

2.1 This policy applies and is mandatory for:

- All Multiverse staff.
- All enrolled learners/ apprentices.
- All Multiverse Governors.
- All Multiverse visitors.
- All other users of Multiverse.

3. Monitoring and Review

3.1 Governance: This policy will be monitored through quarterly reporting to the Quality Sub-Committee by the Designated Safeguarding Lead (DSL). The DSL will present a quarterly review of safeguarding services and effectiveness to the Quality Sub-Committee to ensure Governors are routinely made aware of internal and external updates. This policy will be reviewed and altered, where necessary, but at least annually.

3.2 Lessons Learned: A review of every high risk case will be undertaken once closed to ensure lessons learned are taken forward. Case data and notable themes or trends will be reviewed each quarter and presented to the Quality Sub-Committee.

4. Associated Policies and Standard Operating Procedures (SOP)

- [Anti-Slavery Policy](#)
- [External Speakers Policy](#) and [Risk Assessment](#) (internal link only)
- [Global Privacy Policy](#)
- [Health and Safety Policy](#) (internal link only)
- [Information Security Policies](#) (internal link only)
- [Learner Code of Conduct \(Non-Academic\)](#)
- [Learner Complaints Policy and Procedure](#)
- [Learner Non-Academic Misconduct Disciplinary Process](#)
- [Managing and Escalating Safeguarding Concerns SOP](#) (internal link only)
- [Managing and Escalating Prevent Concerns SOP](#) (internal link only)
- [Managing Child-on-Child Abuse SOP](#) (internal link only)
- [Online Safety Policy](#)
- [Prevent Policy](#)
- [Preventing Sexual Misconduct at Multiverse Policy](#) (internal link only)
- [Safer Recruitment Policy](#) (internal link only)
- [Social Media Policy](#) (internal link only)
- [Staff Disciplinary Policy and Disciplinary Rules](#) (internal link only)
- [Uncontactable Learners SOP](#) (internal link only)
- [Whistleblowing Policy](#) (internal link only)

5. Definitions

5.1 Child: a person or persons under the age of 18 years. The individual may be an enrolled Multiverse learner or an individual may disclose a situation where a child(ren) is at risk of harm, for example, domestic abuse.

5.2 Adult at risk: Multiverse aligns with The Care Act 2014's definition of an adult at risk as someone who is 18 or older and meets all of the following criteria:

- Have care and support needs,
- And are experiencing, or are at risk of, abuse or neglect,
- And as a result of those care and support needs, are unable to protect themselves against the abuse or neglect or the risk of it.

5.3 Safeguarding children: Multiverse aligns on the definition used by the Department for Education's Keeping Children Safe in Education 2025 (KCSIE) guidance which refers to safeguarding and promoting the welfare of children 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 the 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;
- taking action to enable all children to have the best outcomes.

5.4 Safeguarding adults at risk: While the primary statutory duties under the Care Act 2014 fall to local authorities, Multiverse recognises its vital role in contributing to a wider safeguarding system and upholding the principles of the Act.

In line with this commitment, Multiverse defines safeguarding adults at risk as:

- Actively identifying and responding to concerns where an adult (aged 18 or over) has needs for care and support, is experiencing or at risk of abuse or neglect, and as a result of those needs, is unable to protect themselves.
- Ensuring that the rights of adults at risk are protected, empowering them to live in safety, free from abuse and neglect.
- Promoting the wellbeing of adults at risk, always considering their views, wishes, feelings, and beliefs when making decisions, for example, when considering whether to refer concerns to statutory bodies or seeking support from relevant organisations.
- Working collaboratively with local authorities and other agencies, sharing information appropriately and proportionally, to ensure that adults at risk receive the necessary support and protection.

5.5. Safeguarding issues: Safeguarding actions may be needed to protect learners from the following safeguarding issues. Explanations and definitions can be found within Appendix A of this Policy.

- Physical Abuse
- Emotional Abuse
- Sexual Abuse
- Neglect
- Financial Abuse
- Discriminatory Abuse
- Organisational (Institutional) Abuse
- Self-Neglect
- Bullying
- Domestic Abuse
- Modern Slavery & Human Trafficking
- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation (CCE)

- Forced Marriage
- Honour-Based Violence (HBV)
- Female Genital Mutilation (FGM)
- Under-Age Marriage
- Radicalisation & Extremism (Prevent)
- Online Harms (Broader)
- Child-on-Child Abuse
- Fabricated or Induced Illness (FII)
- Missing from Education
- Substance Misuse
- Exploitation through County Lines
- Youth Violence / Serious Youth Violence
- Relationship Abuse (including Teenage Relationship Abuse)
- Sexual Violence, Sexual Harassment and Sexual Misconduct
- Sexting (Youth Produced Sexual Imagery)
- Upskirting
- Breast Ironing
- Faith Abuse
- Private Fostering
- Parental Mental Health (impact on children)
- Parental Substance Misuse (impact on children)

For Adult safeguarding, the Care Act 2014 sets out the several types and patterns of abuse and neglect for adults at risk as:

- Physical Abuse
- Psychological Abuse
- Financial/Material Abuse
- Sexual Abuse
- Organisational Abuse
- Neglect
- Discriminatory Abuse
- Domestic Violence
- Modern Slavery
- Self-Neglect

Multiverse will take any concerns of this nature very seriously and concerns should be raised in the same way as any other concerns to the Safeguarding Team.

5.6 Regulated Activity: Multiverse defines regulated activity in relation to children within its Safer Recruitment Policy as:

- Teaching, training, instructing, caring for, providing advice and guidance on well-being or supervising children.
- Frequently, meaning once a week or more, meeting with children.
- Satisfies the “period condition”, meaning meets three times or more in a 30-day period and provides the opportunity for contact with children.
- Provides the opportunity for contact with children.

6. Learners at Potential Greater Risk of Harm

6.1 Learners with Local Authority Social Worker Involvement

A learner may be involved with a local authority social worker due to various safeguarding or welfare concerns. This involvement often indicates that a learner may have experienced significant challenges or trauma, which can increase their vulnerability to further harm. Such experiences can also present barriers to a learner's engagement, behaviour, and attendance within their apprenticeship programme.

Multiverse encourages local authorities to share relevant information regarding learners with social worker involvement to ensure appropriate support. This information, once received, will be securely recorded, and the Safeguarding Team will provide tailored oversight and support for the learner.

6.2 Learners who are Looked After Children

A Looked After Child (LAC) refers to a person under the age of 18 who is currently in the care of a local authority for more than 24 hours. This can include those living in various placements, such as with foster carers, in a residential children's home, or in certain residential schools or secure units. While privately fostered children are distinct from LAC, local authorities do have specific responsibilities to monitor such arrangements.

A child ceases to be Looked After when they are adopted, return to the care of their parents, or reach their 18th birthday. However, it's crucial to note that local authorities retain ongoing responsibilities to support these young people as they transition from 'Looked After' status to 'Care Leaver' status, as further detailed in this policy.

If a learner chooses to disclose their Looked After status to Multiverse, our Safeguarding Team will ensure they receive appropriate support and will liaise with the relevant local authority to coordinate care and ensure their needs are met.

6.3 Care Leavers

Care leavers are young people aged 16 to 25 who have previously been in the care of a local authority for a period, or periods, totalling at least 13 weeks, which began after their 14th birthday and ended after their 16th birthday. Local authorities retain ongoing duties to support these individuals as they transition to independence, with this support often continuing up until the age of 25 if the care leaver wishes to receive it.

This support typically includes the appointment of a Personal Adviser (PA) who works with the care leaver to develop a Pathway Plan. This plan outlines how the local authority will support the young person in various aspects of their life, including their engagement in education, training, and employment.

If a learner chooses to disclose their status as a care leaver to Multiverse, the Safeguarding Team will provide further support tailored to their needs, including:

- Liaising with their PA and the relevant local authority to ensure coordinated support.
- Providing appropriate guidance and signposting to additional resources.

6.4 Learners who are Asylum Seekers

Learners who are asylum seekers, or have recently held this status, are often at a significantly increased risk of harm due to a range of complex factors. These can include previous experiences of trauma, vulnerability to exploitation (such as modern slavery or human trafficking), mental health challenges stemming from persecution or displacement, and difficulties navigating new systems due to language barriers or lack of social support.

Multiverse recognises the unique vulnerabilities of asylum-seeking learners. Our Safeguarding Team is committed to understanding these specific risks and working to provide appropriate support, including sensitive engagement, relevant signposting to specialist external agencies, and close liaison with statutory bodies where necessary, to ensure their safety, wellbeing, and equitable access to their apprenticeship programme.

6.5 Learners who are Long-Term Carers

Learners who are, or have been, long-term carers for a family member often face significant and unique challenges that can increase their vulnerability to harm. These responsibilities can lead to considerable pressure, impacting their own physical and mental health, education, and social development. They may experience stress, isolation, fatigue, and barriers to learning, and may be at increased risk of their own needs being neglected or of being exploited due to their circumstances.

If a learner declares their carer status, Multiverse is committed to supporting learners with caring responsibilities. Our Safeguarding Team will work to understand their individual needs, provide appropriate internal support and flexibility, and signpost them to relevant external services designed to support carers, ensuring their wellbeing is prioritised alongside their apprenticeship journey.

6.6 Learners who require Mental Health Support

Multiverse is committed to supporting learners' mental health and wellbeing. Poor mental health can significantly increase a learner's vulnerability to safeguarding risks, potentially affecting their ability to protect themselves, making them susceptible to exploitation, or leading to self-harm.

The Safeguarding Team includes trained individuals equipped to provide initial support, respond to crisis situations or signpost to specialist external services.

It is important to note that safeguarding staff are not professionally trained or equipped to provide diagnosis or ongoing treatment for mental health. In cases of immediate risk of harm, Multiverse has procedures in place to involve emergency services if needed.

6.7 Additional Learning Needs (ALN)

At Multiverse, Additional Learning Needs (ALN) refer to any disability or learning difficulty that impacts a learner's ability to engage with their apprenticeship programme without additional support. This includes a wide range of conditions, from specific learning difficulties like dyslexia, to neurodevelopmental conditions such as ADHD or Autism Spectrum.

Learners with ALN may face unique challenges that increase their vulnerability to safeguarding risks. The dedicated ALN Team securely logs disclosed ALN, ensuring tailored support and reasonable adjustments are implemented to mitigate these risks and support the learner's overall wellbeing and educational progress. The Safeguarding Team will alert the ALN Team to any disclosed ALN and vice-versa, when support overlaps.

7. Responsibilities- Safeguarding is Everyone's Responsibility

Multiverse operates on the principle that safeguarding is everyone's responsibility. While all staff play a crucial role, specific statutory and organisational duties are assigned as follows:

7.1 Exec and Governors: Hold ultimate strategic responsibility for safeguarding and promoting the welfare of all learners. They must ensure Multiverse's safeguarding arrangements are effective, comply with all statutory requirements and are regularly reviewed. This includes ensuring appropriate policies, procedures, resources, and training are in place.

7.2 CEO: Responsible for the operational leadership and management of safeguarding within Multiverse, ensuring that the safeguarding policy and procedures are fully implemented and adhered to by all staff.

7.3 Designated Safeguarding Lead (DSL): Holds primary responsibility for safeguarding all learners, including children and adults at risk, championing a whole-organisation approach. They act as the central point for all safeguarding concerns, providing expert advice, making timely referrals to external agencies, and contributing to multi-agency efforts. Strategically, the DSL oversees staff safeguarding training and induction, maintains crucial liaison with senior leadership and external partners, and ensures meticulous record-keeping. They are also responsible for reporting to governance, ensuring the policy's effectiveness and compliance with statutory guidance.

7.4 Deputy Designated Safeguarding Lead: Trained to the same standard as the DSL and provide essential support, ensuring consistent safeguarding provision and availability, particularly in the DSL's absence. Under the DSL's leadership, the Deputy DSL is instrumental in the day-to-day implementation of safeguarding policies and procedures. This includes managing safeguarding cases, conducting risk assessments across a range of concerns, and ensuring robust internal processes are followed to support learners at risk. This also extends to specific responsibilities under the Prevent strategy, such as promoting its principles, assisting in identifying individuals at risk of being drawn into terrorism, and contributing to the development of appropriate support plans, including referrals to Channel, as well as helping to implement and maintain the Prevent Risk Assessment and Action Plan.

7.5 Safeguarding Champion: One nominated senior member of staff within each delivery team (pod). The Safeguarding Champions are responsible for passing on key messages to their fellow delivery team colleagues, that the Safeguarding Team shares with them on a bi-weekly

basis. Safeguarding Champions are not expected to be a focal point for safeguarding disclosures.

7.6 All Staff: Every member of staff has a responsibility to read and understand this Safeguarding Policy, adhere to its procedures, and report any safeguarding concerns or potential early help signifiers immediately to the Safeguarding Team. From August 2025, all employee contracts will stipulate that the signee has read, understood and agrees to follow the Safeguarding and Prevent Policies.

All coaches and instructors will be asked to read and understand Part 1 and Annex A of the Department for Education's statutory guidance, Keeping Children Safe in Education during their onboarding training.

If staff members are identified as engaging or potentially engaging in regulated activity, then they must complete mandatory safeguarding and Prevent training.

8. Confidentiality

8.1 Multiverse is committed to transparent information sharing to safeguard learners effectively. No member of staff can offer, or should promise, absolute confidentiality to any learner. This is because Multiverse's primary concern is the safety and welfare of all individuals.

All safeguarding or suspected safeguarding concerns should be passed on to the Safeguarding Team. Information shared with any Multiverse staff member will be treated sensitively and on a "need to know" basis. However, confidentiality will be broken and information shared with external agencies without consent where there is:

- A risk of serious harm to the learner themselves.
- A risk of serious harm to others.
- Information relating to a criminal offence (whether the learner is a victim or perpetrator).

For learners under 18, any concerns meeting these thresholds will lead to a statutory referral to local authority children's social care, in line with Keeping Children Safe in Education and Working Together to Safeguard Children. For adults at risk, concerns meeting these thresholds will be reported to local authority adult social care.

In all such cases, the welfare of the learner is paramount. Wherever possible and safe to do so, learners will be informed that a disclosure needs to be made and why.

8.2 Multiverse's Uncontactable Learners SOP details the steps taken and individuals contacted when a learner's whereabouts cannot be ascertained, ensuring that safeguarding concerns are rigorously pursued.

8.3 Specific Considerations for Disclosures from Adults:

While Multiverse will always respond to disclosures with empathy and support, there are specific considerations regarding information sharing when an adult learner (aged 18 or over) discloses an experience of abuse, neglect, or crime.

- **Adults At Risk:** If an adult learner meets the criteria for an 'adult at risk' (as defined in this policy) all safeguarding procedures outlined in this policy, including the potential for mandatory referral to external agencies without consent, will apply.
- **Adults Not At Risk:** If an adult learner who is deemed to have the mental capacity to make their own decisions, and who does not meet the 'adult at risk' criteria, discloses that they have been a victim of a crime (e.g., a past sexual assault), Multiverse will provide support and information on their options, including how to report the matter to the police or access victim support services. In such circumstances, where there is no ongoing risk to children or other adults at risk, and the discloser has the capacity to make their own decision, their explicit consent will be sought before sharing information with external agencies. Multiverse will respect the adult's decision regarding reporting to the police, while still offering internal support and signposting.
- **All concerns raised with staff about adults** should still be reported to the Safeguarding Team.

All decisions to share information will be based on a thorough risk assessment, ensuring the welfare of individuals and compliance with legal duties, particularly where there is an ongoing risk to children or other adults at risk.

9. Advice to Staff: When and How to Report

9.1 Emergency: If a member of Multiverse staff becomes aware of an emergency or life threatening concern involving a learner, they must immediately contact the appropriate emergency services by dialing 999.

Following the emergency response, the incident must be reported to the Safeguarding Team using the internal disclosure form, or via email, safeguarding@multiverse.io, using the process detailed in 9.3.

9.2 Recognise: All Multiverse staff must be vigilant for signs of safeguarding concerns or abuse. While no single indicator guarantees harm, common signs include:

- changes in behaviour or mood,
- unexplained physical indicators,
- issues with engagement or attendance,
- emotional distress,
- problematic online activity,
- and concerning relationship dynamics.

Staff must recognise these indicators and report any concerns promptly to the Safeguarding Team, ensuring early help or intervention can be provided when needed.

9.3 Receive a Disclosure: When a learner shares a concern or discloses abuse, Multiverse staff should respond with empathy and care, sticking to these four key principles:

- *Listen Actively Without Judgement:* Let the learner speak freely, without interruption, downplaying the issue, or making suggestions. Stay calm and empathetic; reactions should encourage them to share, not shut them down.
- *Reassure and Validate:* Learners should be reassured that they did the right thing by speaking up. Make it clear their concerns are being taken seriously.
- *Clarify, Don't Probe:* Ask enough questions to clearly understand what is being disclosed, but don't interrogate or lead them. The aim is to gather initial information, not to investigate.
- *Be Honest About Confidentiality:* It should be clearly and calmly explained that this information cannot be kept a secret. Let the learner know that the details of the disclosure will need to be shared with the Safeguarding Team to ensure their safety and get them the right support.

9.4: Report: All safeguarding concerns or suspicions of concerns must be reported to the Safeguarding Team as swiftly as possible using one of the following methods:

- All learner-facing staff can report via the internal disclosure form.
- All staff can report via the safeguarding email, safeguarding@multiverse.io

When reporting a concern, staff should include factual details such as what was seen or said, when it occurred, and where. It is important to record observations accurately, avoiding personal interpretations, assumptions, or judgments. Where possible, direct quotes from individuals should be used. This ensures the Safeguarding Team has clear, objective information to assess the situation and determine appropriate next steps.

9.5 Remain Confidential: Staff must not discuss the case with anyone other than those involved in the case. If staff have any concerns about the progress of the case or have any other concerns these must be discussed directly with the DSL. Breaching this could result in staff facing disciplinary action.

9.6 Historical Concerns: All staff must contact the safeguarding team, if they know or suspect that an employee or learner has a previous history of abuse of children and/or adults. If staff become aware of any allegations against an employee or learner this must always be escalated to the Safeguarding Team.

10. Advice to Learners: When and How to Disclose

10.1 Emergency: If a learner is in an emergency they must immediately contact the appropriate emergency services by dialing 999.

Following the emergency response, the incident can be reported to the Safeguarding Team directly by the learner via email, safeguarding@multiverse.io, using the process detailed below.

10.2 Disclose: If learners experience any safeguarding issues, or become aware of other learners experiencing safeguarding issues they can disclose these concerns to their coach/instructor or directly to the Safeguarding Team. If a learner has a safeguarding concern in relation to their coach/instructor, or simply does not feel comfortable disclosing to their coach/instructor, then they can always contact the Safeguarding Team directly.

Multiverse staff are committed to the promotion of open conversations around safeguarding with learners and will encourage the use of resources available via the Safeguarding Team.

The Safeguarding Team is available to contact for any concern during working hours (Monday to Friday, 09.00 to 17.30) via email, safeguarding@multiverse.io.

For out of hours support, learners are signposted to contact Samaritans (116 123) or Shout Text (85258) who offer advice, support, and guidance.

11. Safeguarding Team Response to Reports and Disclosures

11.1 Acknowledge Receipt of Report: The Safeguarding Team will acknowledge the receipt of all safeguarding reports submitted via the disclosure form or email within one working day.

11.2 Gather Further Information: If necessary, a member of the Safeguarding Team will gather further information required to conduct a risk assessment. This information gathering exercise may require information from other teams, however confidentiality will be maintained.

11.3 Risk Assess: A member of the Safeguarding Team will conduct a risk assessment using the Safeguarding Risk Assessment Framework & Risk Matrix (Appendix B), alongside completing an individualised Safeguarding Risk Assessment Form to determine the level of risk and appropriate response. The individual's holistic assessment will be considered before determining next steps.

11.4 Determine Action Pathway: Based on the risk assessment, the member of the Safeguarding Team determines the appropriate action pathway, considering internal support, and/or external referral/signposting. This will align with the Standardised Action Pathways (Appendix C).

11.5 Monitor Progress: The progress of the safeguarding case will be monitored, whether internal or external, ensuring actions are being completed and the individual's safety is maintained.

11.6 Document All Actions: All actions, decisions, communications, and outcomes will be accurately recorded in the Safeguarding Case Management System.

11.7 Case Closure: Once the concern is resolved, and the individual is deemed safe, the DSL/DDSL formally closes the case, ensuring all documentation is complete.

11.8 Case Review: For complex or high-risk cases a Case Review will be initiated after the case has closed to ensure lessons learned are recorded and future improvements actioned.

12. Allegations Against Staff

12.1 Raising a Concern: Any instance of a child or adult being abused by a Multiverse member of staff is serious. If a member of staff, learner or employer suspects any member of Multiverse staff is abusing a learner, it is their responsibility to raise these concerns with the Safeguarding Team.

12.2 Report: These concerns or suspicions of concerns must be reported to the Safeguarding Team as swiftly as possible using one of the following methods:

- All learner-facing staff can report via the internal disclosure form.
- All staff, learners or employers can report via the safeguarding email, safeguarding@multiverse.io

12.3 Safety First: Upon receipt of the report, the DSL will take such steps that they consider necessary to ensure the safety of the child or adult in question and any other child or adult who might be at risk.

12.4 The 'Harm' Threshold: The allegation will be assessed by the DSL in collaboration with a member of the People Team to determine if it meets the 'Harm' Threshold. An 'allegation of harm' is where it is alleged that a person who works with children or adults at risk has or may have behaved in a way that meets the harm threshold as specified below:

- Behaved in a way that has harmed or may have harmed a child or adult at risk.
- Possibly committed a criminal offence against or related to a child or adult at risk.
- Behaved towards a child or children or adult/s at risk in a way that indicates they may pose a risk of harm to children or adults at risk.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children or adults at risk (this behaviour includes inside and outside of the workplace).

If the 'Harm' Threshold is met, then the concern will be escalated to the Local Authority Designated Officer (LADO) for advice on how to proceed with next steps.

The DSL, deputies and People Team may seek advice from the LADO or local authority equivalent in order to make the determination and decide next steps at any stage of this process. Once the concern has been shared with the LADO, the DSL or deputies will carry out any actions the LADO advises.

In line with the 'Managing Allegations and Misconduct' section of Multiverse's Safer Recruitment Policy, Multiverse is legally required to refer an individual to the DBS when they are removed from working in regulated activity because of a concern about harm. This duty to refer applies even when a referral has also been made to a local authority safeguarding team or professional regulator, or the allegation has already been reported to the police.

In addition to the DBS, the Teaching Regulating Agency's (TRA) jurisdiction extends to individuals who are actively engaging in the instruction or guidance of learners and includes those who are fulfilling a teaching role in apprenticeship programmes.

Upon completion of Multiverse's internal investigation and disciplinary procedures, findings or concerns of serious misconduct regarding those in teaching roles must and will be referred to the Teaching and Regulating Agency. Those in teaching roles who resign or are dismissed can also be reported to the TRA.

12.5 'Low Level' Concern: A low-level concern is any concern that a staff member has behaved in a way that:

- Is inconsistent with Multiverse's Staff Disciplinary Policy and Disciplinary Rules.
- Does not meet the threshold of harm or is not considered serious enough for the DSL to refer to the local authority.

Once the DSL has determined that a low-level concern has been reported, and that no intentional or unintentional harm or abuse has occurred towards children and/or adults at risk, it will be referred to the People Team to handle in line with their policies.

The DSL, deputies and People Team may seek advice from the LADO or local authority equivalent in order to make the determination and decide next steps at any stage of this process.

13. Making a Protected Disclosure/ Whistleblowing

Multiverse has arrangements in place for staff to make 'protected disclosures' or whistleblowing. These arrangements are detailed in the Whistleblowing Policy.

Learners and subsequently parents/guardians of learners under 18, can submit a complaint in relation to staff behaviour & conduct, as well as service provision via the Learner Complaints Policy and Procedure.

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285. This line is available from 8:00am to 8:00pm, Monday to Friday, and 9:00am to 6:00pm on weekends. Email contact: help@nspcc.org.uk.

14. Online Safety

Multiverse is committed to ensuring the online safety of all learners and staff. The dedicated Online Safety Group, comprising members from the Safeguarding and IT Teams, provides leadership in maintaining a safe online environment.

Multiverse's comprehensive [Online Safety Policy](#) provides detailed guidance on our approach, encompassing:

- Robust filtering and monitoring systems to protect against harmful online content, including misinformation, disinformation, and conspiracy theories.
- Strategies for safe remote teaching and learning.
- Measures to ensure cybersecurity resilience.
- Safe and responsible use of Generative AI.
- Clear guidelines for social media engagement, digital and video imagery, and data protection (in line with UK GDPR).
- Procedures for identifying, responding to, and escalating all online safety incidents.

This policy reflects Multiverse's commitment to empowering learners to navigate the online world safely, in line with statutory guidance, ensuring that online risks (related to content, contact, conduct, and commerce) are actively managed, and that all staff maintain appropriate online professional boundaries.

15. Prevent Policy

Multiverse's comprehensive Prevent Policy outlines its commitment to fulfilling its statutory duty under the Counter-Terrorism and Security Act 2015. This policy aims to safeguard all learners from being drawn into terrorism or supporting extremism, and forms an integral part of its broader safeguarding responsibilities. It sets out Multiverse's core objectives to challenge extremist ideologies, promote fundamental British Values (democracy, the rule of law, individual liberty, mutual respect and tolerance), and create a safe environment conducive to open debate while preventing the promotion of harmful views.

The policy details how Multiverse identifies and supports learners vulnerable to radicalisation through clear indicators, risk assessment, and action planning, including procedures for internal reporting and referrals to external agencies like Channel when necessary. It also covers crucial aspects such as staff training, learner awareness, the careful management of external speakers, and online safety measures, ensuring a proactive and collaborative approach to preventing radicalisation across the Multiverse community.

16. Safer Recruitment

Multiverse's Safer Recruitment Policy establishes the procedures for hiring staff, aiming to deter, identify, and reject individuals unsuitable for working with children and adults at risk. The policy details the pre-employment background checks conducted for all candidates, and differentiates between the background checks (including Disclosure and Barring Service Checks) for those engaging and not engaging in regulated activity. Multiverse maintains a Single Central Register of all relevant checks, conducts ongoing vetting of existing staff, and fulfills its legal duty to refer individuals to the Disclosure and Barring Service (DBS) or Teaching Regulation Agency (TRA) where appropriate.

17. Safe Environment

Multiverse operates its office premises in partnership with WeWork, and Multiverse's relevant policies are derived from WeWork's established procedures. WeWork maintains a comprehensive Emergency Action Plan, which includes a Visitors Policy, integrated into robust building security measures. This ensures all visitors sign in/out with valid photographic identification, receive visible badges, and are escorted, preventing unsupervised access to sensitive areas.

The office environment benefits from controlled access points, a 24/7 emergency hotline, and CCTV surveillance in key areas. Multiverse's Events Playbook also incorporates specific safeguarding protocols for larger gatherings and learner-specific events where children may be present. Regular security reviews are conducted, informed by internal risk assessments and Health and Safety Executive (HSE) guidelines, with the Workplace Operations Team consistently implementing and reviewing these vital safety measures.

18. Culture of Safeguarding

In addition to the practices previously listed in this policy, the safeguarding efforts of Multiverse are supported by the following core strands of activity, in a bid to create an organisational culture of safeguarding.

18.1 Staff Training:

- All staff engaging or potentially engaging in regulated activity (including Exec) are mandated to complete Safeguarding and Prevent training every 2 years.
- All coaches and instructors are mandated to complete bespoke Online Safety training every 2 years.
- All members of the People Team are mandated to complete Safer Recruitment training every 2 years.
- All coaches and instructors are mandated to complete bespoke Multiverse Safeguarding and Prevent onboarding training that is specific to learner facing needs.
- All Multiverse staff are mandated to complete: Sexual Harassment Awareness, Cyber Security Awareness, GDPR UK Essentials, Modern Slavery and Anti-Bribery training.
- All Governors and Exec are mandated to complete Safeguarding and Prevent Level 2.
- The Lead Governor for Safeguarding is mandated to complete Designated Safeguarding Lead Level 3 and Safeguarding for Governors and Trustees Core 3 training.
- The DSL and Deputy DSL are mandated to complete a minimum of Designated Safeguarding Lead Level 3 training, Prevent Duty Awareness Training, Prevent Duty Referrals Course and Channel or Prevent Multi-Agency Panel Course.
- Further bespoke training is delivered across teams at Multiverse by the Safeguarding Team based on reporting trends and changes to legislation, policy and procedures.

18.2 Routine Communications and Awareness:

- All learners receive a Safeguarding and Additional Learning Needs Services Module in their Flying Start (induction).

- Each delivery team (pod) has a designated Safeguarding Champion, who will be provided with a safeguarding update on a bi-weekly basis to share with their learner-facing colleagues. The Safeguarding Champion network also acts as a means of receiving organic feedback from coaches and instructors and requests for additional support or training.
- The Designated Safeguarding Lead attends the Delivery Leadership Meeting on a weekly basis and the Operations All Hands on a monthly basis, where safeguarding updates are routinely on the agenda.
- To maintain a high level of safeguarding awareness across the whole organisation, a safeguarding update will be provided to all staff on a bi-monthly basis via the monthly company-wide e-newsletter.

18.3 Proactive Contact with Learners

- The Safeguarding Team proactively contacts learners who have disclosed being at a potential risk of greater harm upon enrollment. This proactive contact introduces the team and makes the learner aware of Safeguarding services available at Multiverse. The learners are under no obligation to respond to the proactive communication. All learners under the age of 18, all learners who are care leavers under the age of 25, and all learners who are long-term carers will be contacted.
- The ALN Team proactively contacts all learners who have disclosed a disability or learning difficulty upon enrollment. The team are trained to recognise safeguarding concerns, and raise these with the Safeguarding Team should a concern arise in relation to learners that they are working with.

19. Roles and Named Persons

Role	Named Person
Designated Safeguarding Lead	Julia Bindley
Deputy Designated Safeguarding Lead	Sophie Harris
Safeguarding Exec Member	Tom Wichman, Senior VP Operations
Additional Learning Needs contact	Kelsey Roberts
Safeguarding Inbox	safeguarding@multiverse.io
Safeguarding Disclosure Form	Disclosure Form (internal link only)
Emergency Services	999: Police, Ambulance, Fire
Safeguarding Governor Link	Barbara Van der Eecken
Regional Prevent Education Co-ordinators	Co-ordinator Contact Form: https://forms.office.com/Pages/ResponsePage.aspx?id=yXfS-grGoU2187O4s0qC-Qovq5-NtvxCgNLhSQJKrbIURVVLMEFKWTQ5WTBIWURQVVkwNE5VSE80TC4u

Appendix A: Safeguarding Issues Definitions

Safeguarding Issue	Definition
<i>Abuse & Neglect</i>	
Physical Abuse	Causing physical harm to a person through actions such as hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm. This also includes fabricating symptoms of, or deliberately inducing, illness.
Emotional Abuse	Persistent emotional maltreatment that causes severe and adverse effects on a person's emotional development. It may involve conveying worthlessness, imposing age or developmentally inappropriate expectations, serious bullying (including cyberbullying), exploitation, or corruption.
Sexual Abuse	Forcing or enticing a person to take part in sexual activities, not necessarily involving violence, whether or not the person is aware of what is happening. This includes both physical contact (e.g., assault by penetration, touching) and non-contact activities (e.g., involvement in sexual image production, watching sexual acts, grooming).
Neglect	The persistent failure to meet a person's basic physical and/or psychological needs, likely to result in the serious impairment of their health or development. This includes inadequate food, shelter, protection, supervision, and medical care.
Financial Abuse	Misappropriation of an individual's finances, such as theft, fraud, coercion related to wills, property, or financial arrangements, or the misuse of powers of attorney.
Discriminatory Abuse	Abuse motivated by discriminatory attitudes towards characteristics such as race, gender, culture, religion, disability, sexual orientation, or age.
Organisational (Institutional) Abuse	The repeated or one-off ill-treatment or neglect of a person, or a pattern of behaviour, within an institution or specific care setting (e.g., poor professional practice, neglect, or gross misconduct).
Self-Neglect	Characterised by a person's refusal or inability to attend to their personal care, hygiene, health, or surroundings, or to manage their day-to-day living, which results in, or is likely to result in, serious harm or significant impairment of their health or development.
Bullying	Behaviour by an individual or group, usually repeated over time, that intentionally hurts another individual or group either physically or emotionally. This includes cyberbullying, prejudice-based, and discriminatory bullying, and can take many forms (e.g., verbal abuse, physical acts, social exclusion).
<i>Exploitation & Contextual Safeguarding</i>	
Domestic Abuse	Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between partners or ex-partners, or between family members. This can be psychological, physical, sexual, financial, coercive, or emotional. Children can be victims of domestic abuse themselves or by witnessing it.
Modern Slavery & Human Trafficking	Encompasses slavery, servitude, forced or compulsory labour, and human trafficking. This involves exploiting and controlling individuals through coercion, deception, or force for personal or financial gain.

Child Sexual Exploitation (CSE)	A form of child sexual abuse where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual activity. It may involve an exchange for something the child needs or wants, and/or for the financial advantage or increased status of the perpetrator, and/or through violence or the threat of violence.
Child Criminal Exploitation (CCE)	A form of child abuse where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal activity. This includes "County Lines," where children are often forced to transport drugs or money.
Forced Marriage	A marriage in which one or both parties have not consented freely and fully, often involving duress, physical or psychological pressure, or coercion.
Honour-Based Violence (HBV)	A crime or incident committed to protect or defend the honour of a family or community, often in response to a perceived breach of a cultural or religious code. This includes threats or acts of violence, abduction, or forced marriage.
Female Genital Mutilation (FGM)	Any procedure that involves the partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reasons. It is illegal in the UK and a serious form of child abuse.
Under-Age Marriage	Any act facilitating the marriage of a child under the age of 18, which is illegal and a safeguarding concern, regardless of whether coercion is involved.
Radicalisation & Extremism (Prevent)	The process by which a person comes to support terrorism and forms of extremism and, in some cases, then goes on to commit terrorist acts.
Online Harms (Broader)	Risks encountered online that can lead to physical, psychological, or emotional harm. This includes exposure to harmful content (e.g., misinformation, disinformation, conspiracy theories, self-harm promotion), harmful contact (e.g., grooming, online abuse), and harmful conduct (e.g., cyberbullying, sexting, online fraud).
<i>Other Harmful Behaviours / Vulnerabilities</i>	
Child-on-Child Abuse	Abuse (including physical, emotional, sexual, and neglect) perpetrated by one child against another child, regardless of age or any age differential.
Fabricated or Induced Illness (FII)	A form of child abuse where a parent or carer fabricates symptoms of, or deliberately induces, illness in a child.
Missing from Education	A learner is not receiving, or has ceased to receive, a suitable and full-time programme of education or training, such as their agreed apprenticeship. This includes persistent or unexplained absence from planned learning or workplace activities where their whereabouts or reasons for non-engagement cannot be ascertained, suggesting they are no longer participating in any suitable education, employment, or training. This includes persistent or unexplained absence.
Substance Misuse	The harmful use of legal or illegal drugs, alcohol, or misused medications that can affect an individual's wellbeing, mental and physical health, or make them vulnerable to exploitation or other safeguarding risks.
Exploitation through County Lines	A specific form of child criminal exploitation where organised crime groups use vulnerable individuals, including children and young people, to transport drugs from urban to rural areas.

Youth Violence / Serious Youth Violence	Violent or harmful behaviour by young people, which can include gang involvement, knife crime, and participation in serious violent incidents.
Relationship Abuse (including Teenage Relationship Abuse)	Abuse occurs in intimate personal relationships between children, which can be psychological, physical, sexual, financial, or emotional.
Sexting (Youth Produced Sexual Imagery)	The sending, receiving, or sharing of nude or semi-nude images and/or videos via mobile phones or other digital devices. This can be consensual or non-consensual and presents significant safeguarding risks.
Upskirting	Taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm.
Breast Ironing	A traditional practice in some cultures involving pressing and massaging a young girl's breasts to stop or reverse their development. This is a form of child abuse and a safeguarding concern.
Faith Abuse	Abuse linked to belief, often within families or communities, where religious or cultural beliefs are used to justify harmful practices, exclusion, or control.
Private Fostering	An arrangement made privately (without the involvement of a local authority) for a child under 16 (or under 18 if disabled) to be cared for by someone who is not a close relative for 28 days or more. These arrangements must be reported to the local authority.
Parental Mental Health (impact on children)	The impact of parental mental ill-health on a child's wellbeing and safety.
Parental Substance Misuse (impact on children)	The impact of parental drug and/or alcohol misuse on a child's wellbeing and safety.

Appendix B: Safeguarding Risk Assessment Framework & Risk Matrix

This matrix provides a guide for assessing the level of risk based on the likelihood of harm occurring and the potential impact if it does.

Risk Likelihood	Minor (1)	Moderate (2)	Significant (3)	Severe (4)	Catastrophic (5)
Rare (1)	Low (1)	Low (2)	Medium (3)	Medium (4)	High (5)
Unlikely (2)	Low (2)	Medium (4)	Medium (6)	High (8)	High (10)
Possible (3)	Medium (3)	Medium (6)	High (9)	High (12)	Very High (15)
Likely (4)	Medium (4)	High (8)	High (12)	Very High (16)	Very High (20)
Almost Certain (5)	High (5)	High (10)	Very High (15)	Very High (20)	Extreme (25)

Risk Level Interpretation:

- Low (1-4): Managed with standard procedures.
- Medium (5-9): Requires active monitoring and specific internal actions.
- High (10-14): Requires urgent internal action and consideration of external referral.
- Very High (15-19): Requires immediate internal action and highly likely external referral.
- Extreme (20-25): Requires immediate external referral (e.g. emergency services, local authority) and critical internal response.

Appendix C: Safeguarding Standardised Action Pathways

Based on the risk assessment (Appendix B), the Safeguarding Team will determine the appropriate pathway.

- **Pathway 1 → Internal Support & Monitoring (Low/Medium Risk)**

Action: Provide internal welfare support, coaching, signposting to internal/external mental health services, regular check-ins.

Monitoring: DSL/DDSL monitors the situation, regular updates with relevant staff.

Review: Periodic review to ensure the concern is being managed effectively.

- **Pathway 2 → External Referral & Multi-Agency Engagement (High/Very High/Extreme Risk)**

Action: Immediate referral to appropriate external agencies (e.g. Local Authority Children's/Adult Social Care, Police) by the DSL/DDSL.

Collaboration: Active participation in multi-agency meetings, information sharing, and follow-up as required by external agencies.

Internal Support: Continue to provide internal support to the learner/staff member as appropriate, collaborating with external agencies.