Safeguarding Policy

Document Control:

Policy Owner	Designated Safeguarding Lead (DSL) - Julia Bindley
Policy Author(s)	Safeguarding Implementation Lead- Jemma Ansell
Governor	Lead Governor for Safeguarding- Barbara Van der Eecken
Effective Date	1st October 2026
Version Number	V7.0
Date of Next Review	1st October 2027

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 (KCSIE) 2026
- Working Together to Safeguard Children Statutory Guidance 2026
- 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, UK GDPR and Data (Use and Access) Act 2025
- Safeguarding Vulnerable Groups Act 2006
- Children Act 1989 and 2004
- Children's Wellbeing and Schools Act 2026
- Information Sharing Duty 2026
- Counter Terrorism and Security Act 2015
- Prevent Statutory Duty guidance April 2021
- Modern Slavery Act 2015
- Education Act 2002
- Online Safety Act 2023
- Workplace (Health, Safety and Welfare) Regulations 1992
- Crime and Policing Act 2026

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 including contractors.

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. Where a case has involved a local authority, the police or another safeguarding partner, the review will also consider the effectiveness of that multi-agency working and any learning will be shared with the relevant partnership.

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)
- DSL Cover and Absence SoP (internal link only)
- Safeguarding and Support for Gender-questioning learners (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 2026 (KCSIE) guidance and Working Together to Safeguard Children 2026 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 impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children;
- taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework:
    - Outcome 1: Children, young people and families stay together and get the help they need
    - Outcome 2: Children and young people are safe in and outside their homes
    - Outcome 3: Children and young people are supported by their family network
    - Outcome 4: Children in care and care leavers have stable, loving homes

5.4 Child protection: Child protection is part of safeguarding and promoting the welfare of children. It is the activity undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, harm occurring in foster care or residential care, and harm occurring online.

5.5 Anti-discriminatory and anti-racist practice: Effective safeguarding is anti-discriminatory and anti-racist. All Multiverse staff must understand and be sensitive to the factors that can affect learners' lives and their willingness or ability to seek help, including economic and social circumstances, ethnicity, religion or belief, disability, sex, sexual orientation, gender reassignment, immigration status and care experience. Staff must be mindful of negative stereotypes that could lead to false assumptions, must recognise how trauma, racism, discrimination and a learner's past experience of services affect their relationship with Multiverse, and must adapt their practice accordingly.

All staff are expected to identify and challenge racism and discrimination wherever

they encounter it, including within Multiverse and within multi-agency working, and to raise it with the Safeguarding Team where it affects a learner's safety or wellbeing. No learner or group of learners will be treated less favourably than others in being able to access safeguarding services that meet their needs.

5.6 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.

5.7 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)
- Misogynistic content/behaviour
- 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
- Making or sharing of nudes or semi-nudes
- AI Deepfakes
- Upskirting
- Breast Ironing
- Faith Abuse
- Private Fostering
- Placement in Temporary Housing
- 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.

5.8 Regulated Activity: In accordance with the Crime and Policing Act 2026, Multiverse defines Regulated Activity in relation to children within its Safer Recruitment Policy as:

- Covering roles where an individual, as part of their duties, has certain contact with children (under 18) or adults at risk, or has management responsibility for those that do. This includes teaching, training, instructing, caring for, or supervising learners.
- 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.
- Provides the opportunity for contact with children.

The equivalent definition for *adults at risk* is as follows:

- Covers roles where an individual, as part of their duties, has certain contact with adults at risk, or has management responsibility for those that do.

- This includes teaching training, instructing, advising, caring for, or supervising learners.
- The full legal definition is set out in the Safeguarding Vulnerable Groups Act 2006.

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 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 family members 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. These staff should consider the range of locally available support to meet the needs of learners. Where staff already have access, they should make use of support from their respective Mental Health Support Team (MHST), which are in the process of being rolled out to all education institutions. As well as delivering evidence-based interventions for early support for mental health issues, MHSTs support organisations to develop their institutional approach to mental health and wellbeing, and give timely advice, liaising with external specialist services, to help learners to get the right support.

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 specialist and emergency services if needed.

6.7 Additional Learning Needs (ALN)

At Multiverse, Additional Learning Needs (ALN) refer to any disability (physical or mental impairment, which has a substantial and long-term adverse effect on a person’s ability to carry out normal day-to-day activities) 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.

6.8 Learners who are LGBTQIA+

Learners who are lesbian, gay, bisexual, transgender, queer or intersex may face specific risks that increase their vulnerability, including prejudice-based bullying and harassment in the workplace or in learning, rejection or hostility at home, higher rates of mental ill health and self-harm, and targeted online abuse. Some learners may not be open about their identity in all parts of their life, and staff must not disclose a learner's sexual orientation or gender identity to their employer, family or peers without the learner's consent, unless there is a risk of serious harm that requires disclosure under section 8 of this policy. The Safeguarding Team will respond to concerns raised by or about LGBTQIA+ learners without judgement, will treat

prejudice-based harm as a safeguarding matter rather than solely a conduct matter, and will signpost learners to appropriate specialist support.

6.9 Learners who are questioning their gender

Multiverse supports gender-questioning learners by prioritising its statutory safeguarding duty and each learner's best interests, taking time to understand their individual circumstances with professional curiosity, and - for those under 18 - involving parents or carers as a priority, except where safeguarding risk requires escalation to the relevant authority. This is done through a flexible, non-stereotyped approach that avoids irreversible interventions, keeps options open, and supports de-transition where wanted for any under 18 learners. Multiverse's Safeguarding and Support for Gender-Questioning Learners SOP sets out Multiverse's approach to supporting learners who are questioning their gender and the processes we follow when a learner (or if under 18 their parents or carer) requests support with social transition.

6.10 Learners who are accessing Temporary Accommodation

Multiverse treats notification that a learner has been placed in temporary accommodation as a trigger for proactive safeguarding support. Our core principle is that any such notification is passed to the Safeguarding Team on receipt and acted on at the earliest opportunity: the team will consider what the placement means for the learner's safety, wellbeing, and ability to participate in and progress through their apprenticeship, and will agree proportionate support with the learner and, where appropriate, their employer.

A notification does not replace, dilute or defer any existing safeguarding or welfare duty, and where a learner has been harmed or is at risk of harm Multiverse will refer to local authority children's social care – or adult social care where the learner is 18 or over – in the usual way, without waiting on any discussion with the housing authority. Staff are supported to remain alert to indicators of homelessness or housing insecurity from any source and report them as they would any other safeguarding concern.

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 (DDSL): Trained to the same standard as the DSL and provides essential support, ensuring consistent safeguarding provision and availability, particularly in the DSL's absence. Under the DSL's leadership, the DDSL 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.

7.7 All Staff listed on the Single Central Register (SCR): All coaches, instructors and staff engaging, or potentially engaging in, Regulated Activity or managing those that do, will be required to read and understand Part 1 of the Department for Education's statutory guidance, KCSIE 2026, during their onboarding training and on an annual basis as required.

If staff members are identified as engaging or potentially engaging in Regulated Activity, then they must complete mandatory Safeguarding and Prevent training.

7.8 Trauma-informed practice: Multiverse operates a zero-tolerance approach to all forms of abuse, harassment, and violence. In alignment with KCSIE 2026 and Working

Together to Safeguard Children 2026, our response to harmful behaviours is inherently trauma-informed. We explicitly recognise that abuse is a safeguarding issue for both the victim and the alleged perpetrator. Staff will maintain a dual-lens approach, understanding that children who display harmful or abusive behaviours may themselves be victims of abuse, exploitation, trauma, or neglect.

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, including another individual connected to the learner - a parent, carer or household member - where it is relevant to the learner's welfare.

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.

For information concerning a learner under 18, or another individual connected to them, Multiverse will share information with relevant external agencies wherever it is relevant to safeguarding or promoting that child's welfare and may help the recipient exercise their safeguarding functions - including early help and emerging need, and not only where a serious-harm or criminal offence threshold is met. For information concerning their safety or welfare, consent is not required, and that lack of consent, a parent's objection, or a learner's reluctance are not valid reasons to withhold.

For cases concerning adult learners, 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).

In specific cases, the DSL/DDSL may decide not to share information about an under 18 learner only where sharing would be more detrimental to the learner than not sharing. Examples include where sharing information:

- Creates an immediate risk of harm
- Interferes with a live police investigation
- Contravenes a Family Court order

In all 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 and, if the learner is under 18, with relevant external agencies where appropriate, 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.

14.1 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 the Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025).
- Procedures for identifying, responding to, and escalating all online safety incidents.

14.2 Artificial Intelligence (AI), Deepfakes, and Digitally Altered Imagery

Definition & Scope: Multiverse recognises that explicit, nude, or semi-nude imagery involving learners may be entirely AI-generated, synthetically produced, or digitally manipulated. The defense or assumption that an image is "not real" or "generated by an algorithm" does not invalidate the severity of the incident.

Equal Urgency & Zero Tolerance: Staff must treat any report, disclosure, or discovery of AI-manipulated or deepfake sexual imagery involving a child with the exact same urgency, seriousness, and formal procedure as a traditional physical or photographic safeguarding incident. This applies regardless of whether the material was created or shared consensually or non-consensually. The majority of delivery at Multiverse takes place remotely, therefore this policy applies to:

- Multiverse platforms: (e.g. Virtual Learning Environments (VLEs), MS Teams, Zoom, portfolio submission portals).
- Peer-to-peer digital communication: (e.g. shared digital workspaces established for apprenticeship projects).
- Professional settings: Digital misconduct occurring via employer networks or devices that impacts a learner's safety or wellbeing.

Escalation & Reporting Protocol

If a Multiverse staff member suspects or receives a report of AI-generated image abuse, they must follow the following escalation pathway immediately:

- Stop and report. Take no investigative action. Report to the Safeguarding Team immediately by the disclosure form or safeguarding@multiverse.io.
- Do not view, copy, forward or download. Staff must not view the material to "confirm" a report, must not copy or forward it for any purpose

including reporting, and must not ask the victim to send it. If material has already been viewed inadvertently, this must be recorded in the report.
- Preserve evidence. Do not delete messages, accounts or devices, and advise the reporting learner not to do so. Record the platform, usernames, dates, times and the account of what was described, in the reporter's own words.
- Employer notification. Where the material relates to a learner's workplace or involves workplace colleagues, the DSL will decide whether and when to notify the employer, based on the risk to the learner and the risk of evidence being lost or the victim being identified. Staff must not notify an employer without the DSL's authorisation.
- Response. The Safeguarding Team will assess, refer to the police and to local authority children's social care or adult social care as appropriate, arrange support for the victim, and where the material may be online, take steps to seek its removal.

Where the person depicted is under 18, the Safeguarding Team will report to the police and to children's social care in all cases.

Response Protocol: The DSL/DDSL will immediately implement standard measures for any affected learner, assess underlying indicators of coercion, peer pressure, or tech-facilitated abuse, and escalate to statutory partners where thresholds are met.

Position where there is an ongoing investigation

Where a matter has been referred to the police or to local authority children's or adult social care, Multiverse's position is that the statutory agency leads and Multiverse does not run a parallel investigation.

Multiverse's role during this period is to protect, to support, and to preserve. Any internal misconduct process is paused until the statutory agency confirms it may proceed, and the Safeguarding Team will agree with the investigating officer what may be communicated, to whom, and when.

Protective measures will be put in place immediately and will be proportionate to risk, not to any presumed finding. These may include:

- Suspending or restricting access to Multiverse platforms and peer-to-peer channels
- Separating learners across delivery groups and shared workspaces
- Adjusting or pausing elements of the apprenticeship
- Suspension from the programme.

Each measure will be recorded with its rationale, communicated to the learner in terms agreed with the investigating agency, reviewed at intervals of no more than four weeks by the DSL or DDSL, and lifted or varied as risk changes.

Support continues throughout for every learner involved. The learner depicted will be offered support that does not depend on the progress or outcome of the investigation, and their right to anonymity will be protected. Multiverse recognises that a learner

alleged to have created or shared such material may themselves be a victim of coercion, exploitation or abuse, and will maintain a trauma-informed approach and a safeguarding response towards them alongside any protective measure. Where a learner is suspended from the apprenticeship, the DSL or DDSL will confirm what pastoral support remains available to them and ensure this is communicated.

Information will be shared only with those who need it to keep a learner safe or to meet a statutory duty. The DSL or DDSL authorises notification to an employer and decides its timing, having weighed the risk to the learner, the risk of the depicted learner being identified, and the risk of evidence being lost. Where an allegation concerns a member of Multiverse staff, the allegations procedure applies and the People team follow the appropriate escalation steps.

A decision by the police or social care to take no further action does not close the safeguarding matter. The DSL will review the case in conclusion, decide what ongoing support, protective measures or internal process is warranted, and record that decision and its reasons.

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 Prevent 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 (SCR) 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 (including responding to AI Deepfakes, and Digitally Altered Imagery or learners who are questioning their gender).
- 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 DDSL 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 Module as part of their onboarding induction.
- Each delivery team (pod) has a designated Safeguarding Champion, who will be provided with a safeguarding update on a regular 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.

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 18, all learners who are care leavers under 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. ALN Team members 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.

18.4 Designated Safeguarding Lead Cover arrangements:

- Multiverse is committed to maintaining robust, documented and tested cover arrangements so that an appropriately trained safeguarding decision-maker is available and able to act. These arrangements apply to planned and unplanned absence alike, and to absence of any length. Concerns are always reported immediately through the routes set out in the Managing and Escalating Safeguarding Concerns SOP, and will be picked up by whoever is on cover. The DSL Cover and Absence SoP sets out the operational standards wherever cover arrangements are required.

19. Roles and Named Persons

Role	Named Person
Designated Safeguarding Lead (DSL)	Julia Bindley
Deputy Designated Safeguarding Leads (DDSLs)	Sean Thomson/Katie Rowlands
Safeguarding Exec Member	Libby Dangoor, Chief Performance Officer
Additional Learning Needs contact	Jade Stewart, ALN Manager
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 Coordinators	Coordinator Contact Form: Link

Appendix A: Safeguarding Issues Definitions

Safeguarding Issue	Definition
Abuse & Neglect	
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 making or sharing of nudes or semi-nudes, watching sexual acts, grooming). Key definitions include: Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration, and A does not reasonably believe that B consents. Assault by penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents. Sexual assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents. (NOTE - Schools and colleges should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault).
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).
Exploitation & Contextual Safeguarding	
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, economic, coercive or emotional. Under section 3 of the Domestic Abuse Act 2021, a child is a victim of domestic abuse in their own right where they see, hear or experience the effects of domestic abuse and are related to either the victim or the perpetrator, or where either the victim or the perpetrator has parental responsibility for that child.
Extra-familial harm	Harm that a child or young person experiences outside the family home - in their neighbourhood, peer group, workplace, place of study or online. It includes exploitation, serious youth violence, peer abuse and grooming. Extra-familial harm is often not within a parent or carer's control, and a protective family does not mean a child is safe. Assessment and planning must therefore consider the contexts in which the learner spends time, and not only their household.
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 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, misogynistic ideologies leading to harmful sexual behaviours), harmful contact (e.g. grooming, online abuse), and harmful conduct (e.g. cyberbullying, making or sharing of nudes or semi-nudes, online fraud).
Other Harmful Behaviours / Vulnerabilities	
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. These exist on a continuum, ranging from inappropriate through to abusive and/or violent in nature, and influenced/driven by real-world or online interactions.
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.
Making or Sharing of nudes or semi-nudes	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.
Deepfakes	Visual and audio content that has been manipulated using advanced software to change how a person, object or environment is presented (including the creation of ‘Deep Nudes’ where advanced technology is used to generate fake nude versions of clothed images).
Gender-questioning learner	A person who experiences uncertainty, distress, or confusion regarding whether their gender identity aligns with their biological sex (the sex they were assigned at birth).
Family Help	The combined offer of targeted early help and statutory support for children in need under section 17 of the Children Act 1989, delivered by a multi-disciplinary team with a lead practitioner and a single Family Help plan. Family Help is voluntary and requires the family's consent.
Relevant Agency	An organisation whose involvement safeguarding partners consider necessary to safeguard and promote the welfare of children in their area, and which is named as such in the published multi-agency safeguarding arrangements. A named relevant agency must act in accordance with those arrangements.

multiverse

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, regular check-ins and signposting to internal/external agencies and partners, including mental health services. These would include Universal services and community-based early help provision.

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.

Cases of this nature would be considered suitable for Family Help (targeted intervention and formally coordinated by local authorities).

Referral destinations will be determined according to the level of risk as identified through the Risk Assessment Framework and Risk Matrix included in Appendix B.

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.