

# SAFEGUARDING POLICY

## Context

This policy details a commitment by *Startingpoint* to ensure all users are safeguarded and can enjoy the platform safely. Any school (or organisation working with children) using *Startingpoint* should have their own safeguarding policy and procedures and follow these in the event of a concern.

*Startingpoint* is a digital platform for children (among other users) to use in their own time.

*Startingpoint* is not a social media platform and there is no peer-to-peer interaction. For information on how we keep user data safe, please see the policies listed at the bottom of this policy.

## Statement of Purpose

1. *Startingpoint* (the Organisation, we, our or us) is committed to preventing and responding to risks of harm to and promoting the welfare of all users that we work with (i.e. as *Startingpoint's* clients). These individuals are referred to as the 'Beneficiaries' of this Safeguarding Policy.
2. We recognise the importance of this commitment to safety and welfare and, further, are committed to safeguarding all Beneficiaries without discrimination due to an individual's age, disability, race, religion or belief, sex, gender reassignment, pregnancy or maternity leave status, marriage or civil partnership status, or sexual orientation.
3. This Safeguarding Policy is based on the safeguarding laws of England, Wales, and Scotland, including related guidance issued by the UK Government and relevant governmental departments, agencies, and public bodies. If this Policy is at any time inconsistent with this body of law, *Startingpoint* will act to meet the requirements of up-to-date safeguarding laws in priority to the requirements set out in this Policy.
4. *Startingpoint* has implemented this Safeguarding Policy in order to meet its obligations as an organisation working with children.
5. Any questions in relation to this Policy should be referred to *Craig Bell* in the first instance, by emailing [craig.bell@mystartingpoint.co.uk](mailto:craig.bell@mystartingpoint.co.uk).

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## Scope of this Safeguarding Policy

6. This Policy explains key aspects of how *Startingpoint* prevents harm in relation to its Beneficiaries via its practices and its Staff Members' conduct.
7. This Safeguarding Policy covers the organisation and operation of all of *Startingpoint's* activities involving children (i.e. our Relevant Activities). These primarily include:

- a. Providing a platform for user to access careers advice and guidance.
  - b. Connecting users with employers via messaging.
8. This Policy's guidelines and obligations apply to all individuals working for or acting on behalf of *Startingpoint* in the UK at all levels, including senior managers, officers, employees, consultants, trainees, homeworkers, part-time and fixed-term workers, casual workers, agency workers, volunteers, and interns (collectively 'Staff Members').
9. This Policy does not form part of any contract of employment or similar and *Startingpoint* may amend it at any time at our absolute discretion.
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## Defining Safeguarding

10. 'Safeguarding' is an umbrella term that refers to work (e.g. practices and procedures) aimed at preventing or responding to harm or risks of harm posed to vulnerable individuals, and at promoting these individuals' wider welfare. Safeguarding is particularly important for children and adults at risk. Most safeguarding legal obligations relate to the care of these groups. This Safeguarding Policy specifically deals with safeguarding children. For safeguarding purposes, children are individuals younger than 18 years old.
11. The commitments and practices contained in this Safeguarding Policy apply to the safeguarding of *Startingpoint's* Beneficiaries from harm caused by either:
- a. The activities and practices of *Startingpoint* and any conduct of its Staff Members, or
  - b. People and situations outside of *Startingpoint's* and its Staff Members' control, where *Startingpoint's* Staff Members are aware of, ought to be aware of, or reasonably suspect the risks posed by a situation.
12. For the purposes of this Policy, a 'Safeguarding Concern' is any conduct or situation that is known or reasonably suspected by a Staff Member or another party that risks violating the safeguarding commitments set out above.
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## Key Measures that Startingpoint is Committed to Implementing and Maintaining to Safeguard its Beneficiaries

13. Ensuring that appropriate Staff Members are trained to, and encouraged to, report any Safeguarding Concerns that they identify. Staff Members will be encouraged to follow *Startingpoint's* safeguarding reporting procedures as closely as possible when reporting concerns (set out below under the heading '*Procedures: Reporting*').
14. Ensuring that all Staff Members listen to all safeguarding-related queries and concerns raised by other Staff Members, Beneficiaries, or relevant other parties, with respect and professionalism. Staff Members are trained how to, and encouraged to, assist with reporting any such concerns via *Startingpoint's* regular reporting procedures.

15. Ensuring that all reported Safeguarding Concerns are dealt with by appropriate individuals and teams and in accordance with *Startingpoint's* relevant procedures (set out below under the heading '*Procedures: Investigation and Response*').
16. Implementing and maintaining comprehensive, accessible, fair, and efficient procedures for Staff Members to use when reporting and dealing with Safeguarding Concerns. These procedures will be made known and easily accessible to all Staff Members.
  - a. Procedures will be designed to ensure all safeguarding issues are dealt with fairly and objectively even when allegations are made against one of *Startingpoint's* Staff Members. Any such allegations will be treated in a manner that takes into account the gravity of the accusations, but which does not vilify or presume the guilt of an accused individual without a fair investigation.
  - b. Any reports that qualify as protected disclosures under whistleblowing law will be treated securely and in a protected manner in line with whistleblowing law.
17. Appointing *Craig Bell* to hold responsibility for managing safeguarding policies and procedures within *Startingpoint*.
18. Following appropriate recruitment processes when recruiting new Staff Members, including volunteers. This includes:
  - a. Conducting all appropriate pre-employment checks (e.g. Disclosure and Barring Service (DBS) criminal record checks).
  - b. Ensuring new Staff Members take part in, and understand the content of, all necessary safeguarding training before having any contact with *Startingpoint's* Beneficiaries.
  - c. Following *Startingpoint's* policies and procedures on hiring and recruitment.
19. Providing appropriate safeguarding training for all relevant Staff Members. Every Staff Member should be provided with, and required to undertake, training that is appropriate to their role, responsibilities, and degree and type of contact with Beneficiaries. This should, where appropriate, include training on:
  - a. How to define and identify potential signs of different types of abuse, including physical abuse, emotional abuse, sexual abuse and exploitation, neglect, and others.
  - b. How to listen to and respond to concerns or disclosures about safeguarding issues during an initial conversation (e.g. how to explain when information can and cannot be kept confidential).
  - c. How to use *Startingpoint's* safeguarding reporting procedures and when doing so is appropriate.
  - d. Which additional resources (e.g. policies, other supporting documents, or external educational resources) are available to ensure Staff Members remain informed about safeguarding.
20. Ensuring that all information related to Safeguarding Concerns, including the content of reported concerns as well as the personal data of anybody involved, is handled safely and securely. This involves:
  - a. Following the requirements set out by the UK's data protection laws, including the UK General Data Protection Regulation (GDPR) and the Data Protection Act 2018.
  - b. Following *Startingpoint's* data protection policies and procedures, including our Data Protection and Data Security Policy.
  - c. Providing Staff Members with training on data protection and privacy, where appropriate.

- d. Ensuring Staff Members always have an identifiable point of contact for questions or concerns about data protection and privacy. This is currently *Craig Bell*, who can be contacted by emailing [craig.bell@mystartingpoint.co.uk](mailto:craig.bell@mystartingpoint.co.uk).
  - e. Only sharing information about a Safeguarding Concern internally as far as is necessary to manage the concern for the relevant Beneficiary's benefit.
- 21. Ensuring transparency and awareness regarding safeguarding information and procedures. For example, by:
    - a. Providing information to Beneficiaries about our safeguarding procedures so that they are aware of how to raise any concerns.
    - b. Ensuring all Staff Members are aware of safeguarding laws, *Startingpoint's* safeguarding commitments and procedures, and Staff Members' responsibilities in relation to these.
  - 22. Regularly reviewing all safeguarding policies and procedures to ensure that they are up-to-date with safeguarding law and that they remain suitable for *Startingpoint's* Relevant Activities and workforce, and meeting any review and evaluation requirements specific to *Startingpoint's* industry and organisation type.
  - 23. Ensuring contact details are provided by each school so that the school can be alerted by *Startingpoint* in the event of a concern.
  - 24. Each school will assign a mentor (or multiple mentors) who can oversee all activity carried out by candidates. Each school should determine how much a mentor observes their group and the way in which they monitor their group. It is anticipated that the mentor would be the most likely role to raise a concern. In this event they should raise the concern in line with their schools own safeguarding policy and procedures.
  - 25. Users have the ability to message employers to seek careers advice and guidance. The mentor of the user must first of all approve the connection between the employer and the candidate. Every message thereafter will be duplicated to the mentor. This will provide them the ability to monitor messages for any concerns. Any concerns regarding employers conduct should be notified to *Startingpoint* immediately.
  - 26. Messaging has been designed to prevent the ability for users to send mobile phone numbers or email addresses. This is to reduce the risk of candidates and employers communicating outside of *Startingpoint*. This measure is a reasonable procedure withing *Startingpoint* to improve safety. Schools should implement their own procedures to manage contact between employers and candidates outside of *Startingpoint*. *Startingpoint* has no way of preventing candidates simply contacting employer via the employers own website.

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## Staff Members' Responsibilities

- 27. All Staff Members have a responsibility to promote the safety and wellbeing of all of *Startingpoint's* Beneficiaries. This means that all of *Startingpoint's* policies and procedures relevant to safeguarding and all UK laws relevant to safeguarding must be followed at all times. Specifically:

28. All Staff Members must contribute to upholding the key measures that *Startingpoint* has committed to taking to safeguard its Beneficiaries (set out above) to an extent that is appropriate for their role, responsibilities, and degree and type of contact with Beneficiaries. Specific ways that Staff Members should do this will be clarified during training. If a Staff Member is uncertain as to their responsibilities, it is their responsibility to raise this with *Craig Bell*.
  29. Staff Members must actively participate in all safeguarding training they are assigned and, if they do not understand any aspects of their training, must raise this with *Craig Bell*.
  30. Staff Members must never do anything to actively risk the safety or wellbeing of any of *Startingpoint's* Beneficiaries. This includes, but is not limited to:
    - a. Subjecting them to or facilitating abuse of any sort.
    - b. Engaging in any sexual activity with children (i.e. anybody under the age of 18).
    - c. Participating in or facilitating any activities that may commercially exploit Beneficiaries. For example, failing to report suspected child labour or trafficking.
  31. Staff Members must report all Safeguarding Concerns that they have regarding Beneficiaries, regardless of whether the concerns relate to potential wrongdoing of other Staff Members, other Beneficiaries, or external parties (e.g. parents, teachers, other organisations, or members of the public).
  32. Staff Members must promote the safeguarding values to all users, including those not from school environments (employers etc) and ensure those values are upheld at all times. Any breach must be reported immediately.
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### Procedures: Reporting

33. Staff Members will receive safeguarding training that should enable them to identify Safeguarding Concerns (e.g. suspected abuse, neglect, or threats to wellbeing) relevant to *Startingpoint's* Beneficiaries.
  34. If a Staff Member identifies a Safeguarding Concern, to report it they should:
    - a. Concerns should be raised with the **DSL of the user's school**
    - b. Safeguarding concerns can be raised directly to *Startingpoint* who will pass concerns on to the user's school.
  35. If a Staff Member feels unable to follow the above steps, they should report their Safeguarding Concern in a reasonable alternative manner. This may be the case if, for example:
    - a. Following the above procedure would require disclosing the concern to somebody who is implicated in the Safeguarding Concern or who the Staff Member is otherwise uncomfortable contacting about this concern, or
    - b. The matter is time sensitive and involves a risk of serious harm to somebody, in which case contacting an external agency (e.g. the police, the ambulance service, or a mental health crisis line) or a more senior member of *Startingpoint's* staff first may be more appropriate.
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## Procedures: Investigation and Response

36. Reported Safeguarding Concerns will be dealt with promptly according to the following process:
    - a. The school that the user attends will be notified immediately.
  37. The alleged victims account will be suspended immediately to ensure the safety of the user and to protect the integrity of any data and/or investigation.
    - b. The nature of any concern raised as a result of using *Startingpoint* will be investigated immediately.
    - c. Any user found in breach of safeguarding or posing a risk to others will have their account suspended immediately.
    - d. *Startingpoint* will notify the police immediately if appropriate.
    - e. *Startingpoint* will liaise with the school to ensure the safety of all users.
  38. Staff Members who report a Safeguarding Concern will be kept informed about the progression of the matter they reported to an appropriate degree. Note that, depending on the nature of the concern and consequent investigations, some information about matters may be kept confidential and not shared with the reporter.
  39. If a Staff Member is found to be in breach of this Safeguarding Policy or safeguarding law in general, they will be treated fairly and will only be dismissed if appropriate in the circumstances and in accordance with employment law.
  40. Referrals or notifications to external organisations (e.g. police services, local authorities, or regulatory bodies) will be made when, and only when, this is appropriate, and will always be made in accordance with the law (e.g. data protection law). Referrals will be made by the school that the alleged victim attends. *Startingpoint* will cooperate fully with any investigation by a 3<sup>rd</sup> party.
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## Supporting Documents and Other Protections

41. *Startingpoint* has various other documents in place that support this Safeguarding Policy. These can be accessed via the website. These include:
  - a. Privacy Policy
  - b. Terms and Conditions
  - c. Community Guidelines
  - d. Childrens Statement
42. This Safeguarding Policy does not cover all of *Startingpoint's* commitments relevant to protecting its Beneficiaries. We also have other policies in place that protect our Beneficiaries, Staff Members, and/or others. These include:
  - a. An Equal Opportunities Policy.
  - b. Privacy Policy.
43. All of the policies, procedures, and other documents set out above are available on request from the person within the Organisation responsible for HR matters or via Staff Members' line managers.

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Reviewed by	Date	Notes
Craig Bell	31/07/2024	Initial completion
Craig Bell	1/09/2025	Annual review