



## Safeguarding Policy

Sparks implements a Safeguarding Policy in order to keep all students safe and protected from avoidable harm. We also use this policy to promote a safe, healthy and positive environment, where all our students can thrive as individuals and develop their learning.

Ensuring the safety and wellbeing of all of our students is always our highest priority. We review this policy regularly, as we continually strive to achieve the highest standards of care and support for our students.

This policy applies to all activities undertaken by Sparks Film and Media Arts, its subsidiaries and franchised operations.

It applies to all team members, including franchisees, independent contractors, volunteers or anyone acting in a professional capacity for Sparks. We all have a part to play and by working together, we can ensure the safety and wellbeing of our students.

It details our approach, practices and procedures for keeping students safe and also includes our Code of Conduct for team members to follow. In conjunction with our Privacy Policy, it also details our measures in relation to image release and publishing.

The policy is available for parents/clients/partners at workshop settings. It is also available publicly via the Sparks website. Print copies are available on request.

In undertaking any work for or on behalf of Sparks, representatives and/or team members agree to follow this policy at all times.

### **Declaration:**

Sparks commits to promoting safety and positive wellbeing for its team members and students, including safeguarding from any avoidable harm.

The management and all team members have a duty to uphold our values, to promote safety and positive wellbeing in all that they do. Every team member also has a duty to report any concerns, following the procedures detailed within this policy.

This policy was reviewed in May 2020 and will be reviewed at least annually, taking into account developments in best practice.

### **Definitions:**

*'Safeguarding'* – refers to a collection of systemic practices that:

- ensure that all students enjoy the best possible outcomes, e.g. provisions to ensure they achieve;
- ensure that students participate in an environment conducive to their overall health, safety and wellbeing;
- prevent any instances of avoidable harm whilst in our care, or in other contexts;
- ensure that any student who is suffering or has suffered harm is identified and responded to appropriately and quickly;

- ensure that all concerns are taken seriously and responded to appropriately and quickly;
- work co-operatively with other agencies that provide safeguarding services for children and adults in need of safeguarding;
- ensure that reasonably foreseeable harm does not occur as a result of careless acts or omissions of the company;
- ensure that team members have the appropriate level of awareness, training and guidance to undertake their duties in safeguarding and support.

*'Child Protection'* – a specific area of safeguarding; the work done to protect specific children who are suffering, or are likely to suffer, significant harm.

*'Sparks' or 'The Company'* – Sparks Film & Media Arts, or any of its branches or operations undertaken on its own or in partnership.

*'Team Member'* – any official employee or representative of Sparks, including franchisees, contractors or volunteers.

*'Child'* – a person under the age of 18, who is a student member of Sparks or who is in the temporary care of Sparks.

*'Student'* – a participant member of Sparks, of any age.

### **Purpose of this Policy:**

The implementation of this policy is designed to safeguard the wellbeing for all students of Sparks during their time with us and beyond.

It is designed to cover the scope of the company's activities so that we can ensure a consistent standard across our network and different channels. It forms an essential part of team member training. All employees, facilitators and workshop staff receive training in safeguarding, based on the contents of this policy.

It provides clear guidance and procedures to team members about safeguarding measures, as well as how to respond to any arising concerns.

It defines our expectations and individual responsibilities in a clear framework, which enables us to uphold standards and where, necessary, hold all team members to account for their actions.

The policy also communicates our expectations and practices to families and external stakeholders, where it acts as a framework to measure both our successes and to identify where and how any breaches may occur. It provides a foundation for future developments based on our learning and best practice.

### **Principles:**

Sparks considers its proactive and preventative safeguarding practices to be fundamental to the delivery of its activities.

In order that students can learn and develop to the best of their ability, we cultivate safe and secure environments. We build up a strong rapport and sense of trust between students and team members.

We expect that safeguarding should take place on an active, continual basis, with every team member taking on responsibility for student welfare. We encourage all team members to take a proactive approach towards safeguarding at all times.

Where students may also require additional support to safeguard from harm in other areas of their lives, we will work in cooperation with other agencies and partners to ensure that the needs and the best interests of the student are well met.

## Legal Context & Framework:

This policy takes into account and makes reference to the following:

- Keeping Children safe in Education: Statutory Guidance for Schools and Colleges
- Working Together to Safeguard Children
- Children Act 2004
- Children Act 1989
- Safeguarding Vulnerable Groups Act 2006
- Protection of Freedoms Act 2012 (particularly sections 5 & 6)
- Human Rights Act 1998
- Sexual Offences Act 2003
- Rehabilitation of Offenders Act 1974
- UN Convention on the Rights of the Child (came into force 1990)
- Data Protection Act 1998
- GDPR 2018
- Police Act 1997
- Criminal Justice and Court Services Act 2000
- Care Standards Act 2000
- Health and Social Care Act 2008
- Prevent Duty Guidance for England issued under section 29 of the Counter Terrorism and Security Act 2015.

## Links & References to Other Policies:

- Sparks Publishing Policy
- Sparks Equality & Diversity Policy
- Sparks Privacy Policy
- Sparks Behaviour Policy
- Sparks Anti-Bullying Policy
- Sparks Complaints Policy
- Activity Risk Assessments

## The Needs of the Student

This policy aims to ensure that the individual needs of each student are provided for and that each student has the opportunity to thrive whilst in our care.

We consider individual needs to include:

- Physical and Sensory Needs
- Emotional Needs
- Intellectual Needs
- Social Needs

Each team member should work consistently to identify and assess the needs of each individual student and apply measures to ensure that those needs are met. Team members should refer to the Safeguarding Training documents for further detail on identifying and assessing varying needs, as well as potential measures for ensuring all round wellbeing.

## Safe Environments

Each team member should take proactive measures to ensure that the environment is safe and conducive to positive health and wellbeing.

Our workshop environments are safe spaces for students to share their ideas and their contributions, based on a foundation of mutual respect, creative collaboration and positive strategies for group behaviour management. Team members should pay close attention to the behaviours and dynamics of the group, making sure that the environment supports the best possible outcomes for all students.

Students should always feel that they are welcome and involved in the activity. They should feel listened to and empowered to join in, to contribute and to take ownership of their involvement. They should feel confident to actively participate and they should know that their contributions are valuable.

Students should never feel that they are discriminated against on the basis of race, gender, culture, sexual orientation, economic status or ability (with the exception of religious observance, when students may be given special allowances to observe the practices of their faith).

Team members should make sure to take every reasonable precaution to minimise the risk of harm to any student. They should follow the policies, procedures and guidelines set out within this policy and within the relevant Risk Assessment. A First Aider should always be present and available to administer First Aid where needed.

### Risks of Avoidable Harm

Sparks adopts a policy of prevention in its approach and implements a series of preventative measures designed to eliminate or minimise any potential risk of harm to students whilst in our care. These measures are outlined in our Risk Assessments, as well as in a number of additional policies, including our Equality and Diversity policy, our Behaviour policy and our Anti-Bullying policy. These measures are all designed to comply with the latest regulations and advice provided by Ofsted and take into account other relevant legislation.

We expect that safeguarding should be proactively taking place at all levels and at all times as part of our efforts to cultivate and maintain a safe space for students to participate.

We consider 'Risks of Avoidable Harm' to include:

- Risks to Physical Health and Safety
- Risks to Emotional and Psychological Health and Safety
- Risks to Sexual Health and Safety
- Risks of Neglect / Their individual needs not being met

Where we may work with students over the age of 18, we will also consider:

- Risks to Financial Health and Wellbeing
- Risks to Independence or the possibility of Coercive Control

Team members should observe and identify any possible risks to harm during the course of their work for Sparks. They should refer to the systems included here under Reporting Procedures.

Where possible, they should take any reasonable steps to prevent incidents of harm occurring by following the Risk Assessment or taking other appropriate actions, such as the measures contained within the Anti-Bullying or Behaviour policies. Where immediate action is not possible, or in the case of further attention being required, concerns should be reported following the procedures documented in this policy at the earliest possible opportunity.

### E-Safety:

Owing to the nature of our work, special attention should also be given to the subject of bullying and cyber bullying, with students made aware of their responsibilities as online citizens, as well as measures to respond to incidents of bullying.

### Personnel and Levels of Responsibility

Every team member shares in the responsibility for safeguarding and is expected to actively practice this Safeguarding Policy within their work for and on behalf of Sparks.

#### **Workshop Instructors, including Assistants and Volunteers:**

Instructors are responsible for cultivating safe workshop spaces. They will observe students during participation, identify and respond to the needs of individual students in their care. They will also

follow the relevant Risk Assessments and implement the necessary controls. In the event of any incidents or concerns, they will report them quickly in line with the reporting procedures contained within this policy.

**Duty Managers/Supervisors:**

Managers are responsible for overseeing that the systems, practices and procedures of this policy are implemented during activities, as part of their line management of Instructors. They will communicate any relevant safeguarding details (e.g. student medical conditions, allergies or medications) to Instructors and other team members as necessary. They will also provide guidance to Instructors, Assistants and Volunteers and ensure that incidents are properly reported. They will report in to their Manager, or to the Designated Safeguarding Lead as appropriate, escalating any reports or concerns that require urgent attention.

Managers must take part in Safeguarding Training and be certified to Level 1.

**Designated Safeguarding Lead – Per Location or via Head Office:**

Each specific Sparks branch (or franchise, club etc) will have a Designated Safeguarding Lead (DSL). This will typically be the branch manager, or franchisee, although in some cases it may be an alternative nominated team member.

The Designated Safeguarding Lead will respond to major incidents or concerns that relate to a potential risk of harm. They will process all Incident Reports and assess for any potential risk of harm that may not have been identified by Instructors or Managers.

They will provide routine and informal safeguarding training to other team members and communicate updates to this policy as they take place. They will also liaise with external agencies and partners as necessary, where safeguarding efforts may require additional involvement. They will report any serious concerns, e.g. in the case of Child Protection cases, to the Local Authority Designated Officer (LADO).

Each DSL must have taken part in Safeguarding Training and be certified to Level 3.

**Local Authority Designated Officer (LADO):**

The LADO is a nominated representative of the local authority where the activity takes place. They have ultimate responsibility for ensuring the safety of children and vulnerable adults within their local authority area.

The LADO should be made aware of any breaches to this policy, where there is a potential risk of serious harm to any of our students. Reports to the LADO can be made by the Sparks DSL, by any individual team member, or by parents or other stakeholders where they have serious concerns about the welfare of a student.

**All Team Members**

It is our policy that individual team members do not work in isolation. They should always supported by at least one other team member at the same location. In this structure, team members should be watchful and report any concerns relating to the welfare of our students, including the actions or the experiences of any other member of the team.

**Recruitment Policy – Safer Recruitment Standards**

Our Recruitment Policy works to ensure that:

- The safeguarding and welfare of children and young people is taken into account throughout the process
- The best possible staff are recruited on merit, ability and suitability for the post – therefore every internal and external applicant who applies for a job with the company will be considered against objective criteria, which specifically relates to the requirements of the role for which they are applying

- All applicants are considered fairly and consistently
- No applicant is discriminated against on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation
- All relevant recommendations and guidance is taken into account in the processes used including recommendations in the DfE document, “Keeping Children Safe in Education”, in relation to:
  - Safer Recruitment and Selection in Educational Settings
  - Disclosure and Barring Service code of practice
  - The establishment of a Single Central Record

## Safer Recruitment Practices

### Enhanced DBS Checks:

All new members of staff must undergo an enhanced DBS check, including a (children’s) Barred List check, as part of the application process. Appointments will not be confirmed without this.

If the candidate has an existing enhanced disclosure certificate (dated within 12 months) and is registered the DBS update service, then this is also acceptable. All certificates must be original copies and will be verified by a Manager. Sparks will retain the DBS number, date and other details for their records.

Applicants will be required to disclose all convictions and cautions at the point of application, including those that are spent; the exception being certain, minor cautions and convictions which are ‘protected’ for the purposes of the ‘Exceptions’ order. For filtering, Sparks will refer to the UK Government advice: <https://www.gov.uk/government/collections/dbs-filtering-guidance>

### Further Checks

In addition to an enhanced DBS disclosure, potential members of staff must also be able to provide:

- Photographic proof of identity (e.g. a passport or driving licence)
- Proof of the Right to Work in the UK
- Two professional (or academic) references. At least one of the referees should know the member of staff in a professional capacity of working with children (and should be from within the last 2 years).

All documentation should be provided as original copies and Sparks will take copies for their records. All checks must be completed and documents verified prior to confirmation of the appointment. If checks have not been completed, the team member must be fully supervised by a verified team member and must not be left in charge of children or students whilst verification is pending.

All team members must read and sign the ‘Statement of Commitment’, confirming that they have read and understand the terms and procedures contained within this policy. In signing the Statement of Commitment they agree to abide by the Code of Conduct. A copy will be retained by Sparks for their records and Statements will be updated at regular intervals.

### Single Central Record

Sparks will maintain records of the Safer Recruitment checks on each team member for the duration of their appointment, up to a maximum of 7 years since their last engagement, on a Single Central Record system. The SCR system will record details of all team members.

## Safeguarding Training

Introductory Safeguarding training is provided to each team member as part of our induction process. The training covers the different aspects of this policy. Every team member will be made aware of safeguarding responsibilities as part of their usual duties for Sparks through their line manager, in addition to the details contained within this policy. Training updates will be provided at least annually to all team members.

Every Manager for Sparks will complete compulsory Safeguarding Children training (Level 1) as part of their Management training package. This training will be refreshed every three years.

Designated Safeguarding Leads will complete training to Level 3. This training will be refreshed formally every three years. DSLs will also research and refresh their knowledge on a regular basis as part of their Continuing Professional Development.

From time to time, Sparks may refer members of staff for Safeguarding Children training. If a member of staff would like further information on Safeguarding Children training and formal training providers, this can be requested and provided by their line manager.

## Supervision

Students must be supervised by a member of staff at all times, with the exception of trips to the toilet. Students aged 7+ may travel between filming locations within close proximity independently, subject to the details of the Risk Assessment.

The following supervision ratios must be maintained:

Ages 5-7 = 1:6

Ages 8-12 = 1:8

Ages 13-18 = 1:10

Students in the care of Sparks should never be responsible for the supervision of other children.

Students should not leave the care of Sparks during agreed session hours, unless collected by a parent/guardian or other nominated adult.

Students under the age of 16 should not leave sessions unaccompanied unless Sparks has permission *in writing* from the parent/guardian. Children aged 8 or younger must not leave independently and must be collected by an adult.

Where a parent/guardian is late to collect a child, team members should attempt to contact parents/guardians after 10 mins, by both phone and email. If a student remains uncollected by their parent/guardian after 45 minutes and no communication has been made, students should be taken to the nearest police station. It is the responsibility of the Duty Manager to supervise the student until collected, or until safely taken to the police station.

## Staff and Student Relationships

The company encourages team members to build a warm and personal rapport with students. We feel that a sense of trust and equality of participation is important for their enjoyment, engagement and learning. We expect team members to be friendly, respectful and to share in the sense of creative fun that our work inspires.

It's important for all team members to understand that they hold positions of trust, with influence over our students. Professional boundaries between students and team members must always be maintained; team members should not engage in any relationship with a student other than a properly conducted staff-to-student relationship.

The company takes the possibility for improper relationships very seriously. In the case of any relationship that does not observe the required professional boundaries, regardless of the student's age, the team member will be immediately determined to have committed gross misconduct and abuse of trust. This will result in immediate termination, as well as a disclosure report to the relevant external agencies where applicable.

Where any team member has an appropriate relationship outside of the routine operations of Sparks, e.g. they are a neighbour or have previously taught the student elsewhere, then this should be declared at the earliest opportunity to the Designated Safeguarding Lead.

With the Manager's consent, it is permitted for team members to undertake private engagements outside of the remit of Sparks, e.g. private tuition or childcare services, but this must be declared and the Manager's permission must be sought in advance. This will not be unreasonably withheld.

### **Physical Contact**

We recognise that physical contact is sometimes a useful tool within creative learning (e.g. in directing actors) or as a comfort to students who may be in distress.

It is important that members of staff ensure that physical contact is used judiciously to support learning outcomes or contribute towards the student's wellbeing. Any physical contact should be explained to the student beforehand in order to gain their consent and team members should be sensitive to the student's reaction.

A student should never be touched in a part of their body that could be described as "private".

Where physical contact is initiated by the student, team members should gauge whether it is appropriate in the context to enable this and/or reciprocate, based on maintaining professional boundaries. In the case of primary-aged children, appropriate physical contact (hand holding; arm around shoulder; gentle hug) to comfort or reassure a child is acceptable. If there is doubt, avoid physical contact with the student and complete an Incident Report.

### **Recordings and Personal Devices: Students**

All recordings should be made using company equipment and is subject to the processing and ownership conditions and procedures detailed in the Privacy Policy.

Students are discouraged from using personal devices during sessions. We request that students' personal devices are hidden away from view as part of our Behaviour policy. This is to prevent instances of unauthorised images and video recordings from being taken, which are likely to capture the image and likenesses of other students.

Students should not take photographs or other recordings of other participants and must not share them on any social media platforms. We operate a warning system: if phones are repeatedly used during the sessions, or used inappropriately then they will be confiscated by the supervising team member and returned to the student, or to their parent/guardian at the end of the session.

If a student records any images or videos of another student, or of a staff member without their consent, on a personal device then this should be recorded as a behavioural incident and the DSL should be made aware. The student should immediately delete the content, witnessed by a team member, and should be made aware that this is not acceptable under the Behaviour Policy.

### **Recordings and Personal Devices: Team Members**

Team members should carry a mobile phone in case of emergencies or to communicate with other team members as part of their work for Sparks.

We discourage the use of team members' personal phones during sessions, or in view of students, unless for the specific purposes of safeguarding, e.g. making Incident Reports to the relevant team members, or contacting other team members to request support or advice. Phones or devices should not be used for personal reasons except during break times.

Phones or other devices should be secured with a password or alternative security mechanism, e.g. a fingerprint or facial recognition. Students should not be permitted access to any team member's phone or personal device.

Where a team member may be using a personal computer (e.g. a laptop) within their work for Sparks, they should ensure that they are using a separate profile and that any personal content is secured



under a password or alternative security mechanism. Students should not have access to any team member's personal files.

### Age Appropriate Content & Participation

We aim for students to grow and develop with us in spaces where the values of 'childhood' and 'adolescence' are protected and celebrated.

Every student should feel comfortable participating in their appropriate age group and should be appropriately challenged. Their individual emotional and intellectual needs should be met by the activities, with appropriate differentiation responding to varying ability and maturity levels.

Students should not participate in incorrect age groupings, unless it is clearly in their best interests and in the interests of the group overall.

All educational content should be appropriate for the age group of the students taking part. Any material that is shown to students, e.g. film clips, needs to be of a suitable age rating for the group, following BBFC guidelines. Team members should not show any material that is rated above the average age of the group.

Subject matter explored in creative work by students should also reflect age appropriate boundaries, in correspondence with BBFC guidelines. Film content should not feature any realistic portrayals of knife or gun violence, or any mature 'threats' or sexual content.

### Online Safeguarding & Privacy

As a producer of work by children and young people, Sparks recognises and takes seriously its duty to produce and publish work safely and reduce any possible risk of harm that may arise in the production of its work.

Image release permission must be given for each individual student by their parents. Where students are aged over 12 years, they must also give their consent to their image release and should have the context explained to them. Students who do not have image release permissions (extending to their image, voice and likeness) must not appear on camera and any material featuring their image should be deleted as soon as possible, it must not be released.

In producing work, team members should take every care to protect the anonymity of students. Content must not include any details which may identify personal identities. The work should not disclose any surnames, or any personal contact details or locations. Fictionalised character names should be used wherever possible. Team members should also take care not to include any background names or images of people passing by, or photographs, in particular any names or images of children.

Where credits are featured they should not contain the surnames of any child under the age of 16. In the case of students aged 16+, we understand that content may be of value to students in seeking career opportunities and so their full names may be included within the credits, however consent to the inclusion of their full name must be obtained.

Where video material is shared online, it must be designated as having been made for/by/with children or minors. Any comment features must be disabled.

Team members should treat all material produced in the course of their work as confidential and it should only be published in conjunction with the Publishing Policy. To ensure full accountability for any material in the public domain, and its suitability for viewing by children and young people, it is important that team members do not release any unauthorised material, including raw footage and rough cuts that do not form part of any final authorised release.

## Radicalisation

Sparks seeks to protect students from the risk of radicalisation and extremism, in line with the national Prevent strategy: <https://www.gov.uk/government/publications/prevent-duty-guidance>

Team members will receive training in preventing radicalisation and the potential indicators to look out for. They should observe students for any of the signs associated with radicalisation or extremist views as part of their work.

In the event of any concerns, team members should report to the DSL, using the reporting procedures outlined within this policy.

The DSL will work in conjunction with the Prevent strategy and local support to ensure that students are protected and receive specialised support where necessary.

## Confidentiality

As part of this policy and in compliance with GDPR, Sparks will keep records containing personal data on all students and team members. These records will be treated in the strictest of confidence and will only be accessed by selected team members, where it serves the function of their role and where it is in the interests of safeguarding.

Where it applies to safeguarding or child protection, team members have a responsibility to share relevant information with internal team members and external partners or agencies. These details may only be shared within the appropriate professional contexts and where there is a justification linked to safeguarding the interests and wellbeing of the student. Wherever Sparks is approached by a professional authority for information relating to the safeguarding or protection of a student, this information will be disclosed in the spirit of partnership and full transparency will be given.

Team members should avoid discussing information pertaining to safeguarding or the protection of children with anybody other than the authorised professionals detailed in this policy. Any breach of confidentiality not covered here will be considered as gross misconduct.

## Reporting Procedures:

Where an incident occurs or team member has concerns, this should be reported via one or more of the following channels.

Incidents and concerns should be categorised as Minor, Major or Emergency Incidents, taking into account the risk of potential harm to the student:

## Minor Incidents or Concerns:

An incident or concern may be categorised as 'Minor' if:

- The risk is relatively short term and may resolve itself within a given amount of time
- The risk to harm represents a low impact to the student
- The risk to harm has already been mitigated or is already being managed under an active strategy with involvement by a manager or the DSL.

Examples of Minor Concerns of Incidents:

- Isolated incidents of conflict, e.g. single occurrence name-calling
- Child reports or demonstrates feeling tired or stressed, or demonstrates a 'low mood' (as a short-term behaviour)
- Behavioural incidents, which are contained within the context of the workshop or session, e.g. an argument between two students
- Child is upset by an activity within the workshop or session, e.g. doesn't get the part they wanted
- Child has an accident, resulting in a minor injury, treatable on-site with First Aid, e.g. slips, trips or falls in the playground.

The team member should take any action that is reasonable at the time in order to improve the student's wellbeing, referring to their training, the Needs of the Student guidance and the Risk Assessment or relevant policy measures. Where the team member may be unsure, they should seek the advice of the Manager or the DSL.

Minor Incidents and Concerns should be reported using the Incident Report Form. This should be completed as soon as possible following the incident, reflecting matter-of-fact details about how the incident occurred and any action that was taken at the time.

Incident Report Forms should be copied to the relevant Managers using company communication channels.

If there is a risk to future harm related to any Minor Incidents or Concerns, the Manager should refer the report to the DSL.

Parents/guardians should be notified at the end of the day and should sign the form as an acknowledgement. Where a student leaves independently, a copy of the Incident Report Form should be sent to the parent/guardian by the end of the same working day. In some cases, referrals may be made to external agencies, such as the students' school, their parents, or the local authority.

### Major Incidents or Concerns:

An incident or concern may be categorised as 'Major' if:

- There is a significant risk to harm
- There may future risks associated with the incident/concern
- The incident or concern is part of a wider pattern of events or behaviours
- The incident or concern is likely to directly affect multiple students
- There is any risk of criminality or possible threat to life in the foreseeable future

Examples of Major Concerns of Incidents:

- Student displays symptoms associated with eating disorders
- Student is suffering from long-term bullying issues or low confidence
- Student demonstrates violence towards themselves or others
- Student attempts to leave the premises or remove themselves from the care of Sparks
- Student requires urgent medical treatment for injuries or pre-existing conditions
- Student displays signs associated with forms of abuse, or makes a disclosure relating to abuse

The team member should take any action that is reasonable at the time in order to improve the student's wellbeing, referring to the Risk Assessment or to the relevant policy measures. Where the team member may be unsure, they should seek the advice of the Manager or the DSL.

Major Incidents or Concerns should be reported immediately to the Manager and to the DSL, in person or in a phone call. An Incident Report Form should be completed, describing the events in as much detail as possible. All major incidents should be reported to the Manager or DSL within 1 hour, or immediately, where there is a significant or immediate risk of harm.

Major Incidents or Concerns will be reported urgently to the student's parents/guardians and will often result in reports to external agencies.

### Emergency Incidents or Concerns:

An incident or concern may be categorised as 'Emergency' if:

- There is a significant and immediate risk to harm
- The incident or concern is likely to cause significant harm to multiple students
- The incident or concern requires immediate management or involvement from an external agency in order to mitigate the risk

Examples of Major Concerns of Incidents:

- Student requires urgent medical attention and/or an ambulance

- Any immediate or short term threat to life

Emergency Incidents or Concerns should be handled via the measures contained within the Risk Assessment, or through any other measures that will immediately improve the safety and wellbeing of the student(s) and team member(s). This may include calling the emergency services.

Emergency Incidents and Reports should be reported urgently to the DSL as soon as it is safe to do so.

### Reporting Concerns Relating to Team Members:

Where a team member, or a parent or student, has concerns relating to the conduct of another team member, they should approach the DSL.

If the concerns relate to the DSL, or if the person reporting their concerns feels it is more appropriate, then they should approach the LADO directly. Details of the LADO can be found via the local authority's website or phonenumber. Where applicable, they should also contact the local police force.

### Student Disclosures

If a student approaches a team member to discuss any concerns or any threats to their well-being, the team member should:

- Listen actively to the student and make a note of any details on an Incident Report Form as soon as possible
- Inform the student that they cannot keep the information to themselves and may need to share the details of the conversation with other team members
- Reassure the student that they have done the right thing to confide in you
- Report the disclosure as quickly as possible to the DSL

### Investigations:

Where a report is made, Sparks will conduct investigations into the circumstances and into the conduct of any team members involved. This will be led by the DSL in conjunction with senior management. Whilst any investigation is taking place, any team members involved may be suspended until the investigation is concluded.

If their conduct is found to be in breach of this policy, the outcomes of such investigations may lead to further training, increased supervision, suspensions or terminations. Serious breaches of this policy will be treated as gross misconduct. Where applicable, reports will also be made to the relevant authorities.

If suspended, the team member will have absolutely no contact with any student and will not represent Sparks in any capacity. If a team member has been removed from their usual duties, it is important for all team members to understand that this is the normal procedure whilst the investigation continues and is not a determination of misconduct or criminality.

Where any breaches of this policy represent the possibility for criminal conduct, they will be immediately reported to the police and/or the LADO as applies to the circumstances.

### Complaints & Grievances

In the event that a student or parent/guardian wishes to make a complaint, they should contact their Sparks Manager in writing. Every complaint will be thoroughly investigated by the management at Sparks. Where relevant, information relating to the complaint may also be shared with the appropriate professional authorities (e.g. Social Services, The Metropolitan Police Force.) Please see the Complaints Policy for further details.

## Team Member Code of Conduct

### Do:

- Make students feel welcome
- Get to know students on an individual basis
- Model the Sparks values and set a good example for students to follow
- Listen to students when they speak and value their contributions
- Build trust and show respect to students and to other team members at all times
- Promote equality and celebrate diversity
- Work in collaboration with other team members
- Encourage positive behaviours
- Apply fairness and consistency in your approach to managing behaviour
- Actively identify and respond to individual needs, prioritising safety and wellbeing
- Maintain professional boundaries
- Follow the guidance of the Risk Assessment at all times
- Consider age-appropriateness when content planning, or producing material, especially in the instance of showing film clips
- Complete Incident Reports as they take place, with matter-of-fact details
- Report any concerns, no matter how small, to the appropriate contact
- Implement measures from the Risk Assessment, Publishing Policy, Behaviour and Anti-Bullying Policies when they are required
- Review the policy and participate in Safeguarding Training regularly
- Refresh any personal training, e.g. First Aid, regularly
- Use discretion and uphold confidentiality when discussing any personal details or other confidential information
- Reference the Publishing Policy when producing and submitting film products

### Don't:

- Assume safeguarding is somebody else's responsibility; it's a shared effort and you should contribute
- Enter into personal interactions with a student which are not reflective of a professional staff to student relationship
- Share personal contact details or inappropriate details of your personal life with students
- Engage in any private communication with students. Where external arrangements may be in place, in the case of children, communication should be with the parents/guardians
- Ignore students or dismiss their point of view without engaging with them
- Make promises you can't keep (e.g. to keep something secret)
- Initiate physical contact, unless there is a good reason to do so and you have sought their prior consent
- Spend time alone (one-to-one) with a student, unless there is an appropriate reason. Seek the presence of an additional team member, student, or other appropriate adult, or relocate to a communal space
- Show age inappropriate material or encourage age inappropriate content when working creatively
- Keep any concerns to yourself
- Reveal any confidential details, except where they are required for safeguarding
- Use personal devices to take any photographs or videos. If any material is captured, it should be deleted immediately and an Incident Report made.
- Allow student access to any personal devices. All personal devices should be locked with a passcode/fingerprint etc.
- Discriminate against any student on the basis of race, sexuality, gender, ability, religion or faith.

## Statement of Commitment

I confirm that I have read, understand and will follow the practices and procedures set out within this policy.

I understand that:

- Safeguarding is everyone's responsibility, including mine
- I should be implementing safeguarding practices into my work on a continual basis
- Safeguarding the wellbeing of students is my utmost priority when working with Sparks
- Compliance with this policy is a condition of my contract with Sparks
- This policy must be followed at all times whilst representing Sparks
- Failure to comply with this policy may result in dismissal or the termination of my contract, along with any measures taken by external agencies
- Additional guidance and support is available to me if I am ever unsure

SIGNED:

DATE:

NAME: *(print)*