



SPECTRUM GAMING

Safeguarding Bundle (June 2025)

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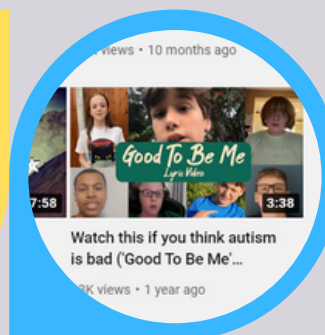
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Online



Training



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SAFEGUARDING BUNDLE

Safeguarding Bundle Overview

Last Update : June 2025

The purpose and scope of this bundle:

The purpose of this bundle is:

- To protect the children and young people who are registered members with Spectrum Gaming
- To provide parents, staff and volunteers with the overarching principles that guide our approach to child protection.

This policy applies to anyone working on behalf of Spectrum Gaming, including:

- The Board of Trustees
- Paid Staff
- Volunteers
- Sessional Workers
- Students
- Contractors

Legal Framework

This policy has been drawn up on the basis of the legislation, policy and guidance that seeks to protect children in the United Kingdom.

Policies & Procedures included in this bundle:

This bundle is a series of documents that should be read and used procedurally alongside each other:

- Role of the Designated Safeguarding Lead
- Dealing with disclosures and concerns about a child or young person
- Managing allegations against staff and volunteers
- Recording and information sharing
- Code of Conduct for Staff & Volunteers
- Safer Recruitment
- Online safety
- Anti-Bullying
- Managing complaints



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We believe that:

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

We recognise that:

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

We will seek to keep children and young people safe by:

- Valuing, listening to and respecting them
- Appointing a Designated Safeguarding Lead (DSL) for children and young people, a deputy and a lead trustee for Safeguarding.
- Adopting child protection and safeguarding best practice through our policies, procedures and code of conduct for staff and volunteers.
- Developing and implementing an effective online safety policy and related procedures
- Providing effective management for staff and volunteers through supervision, support, training and quality assurance measures
- Recruiting staff within the 'Safer Recruitment' guidelines.
- Recording and storing information professionally and securely adhering to GDPR.
- Sharing information about safeguarding and good practice with children, their families, staff and volunteers via leaflets, posters, group-work and one-to-one discussions.
- Using our safeguarding procedures to share concerns and relevant information with agencies who need to know, and involving children, young people, parents, families and carers appropriately.
- Using our procedures to manage any allegations against staff and volunteers appropriately



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- Creating and maintaining an anti-bullying environment and ensuring that we have a policy and procedure to help us deal effectively with any bullying that does arise.
- Ensuring that we have effective complaints and whistleblowing measures in place.
- Ensuring that we provide a safe and physical environment for our children, young people, staff and volunteers, by applying health and safety measures in accordance with the law and regulatory advice.
- Building a safeguarding culture where staff and volunteers, children, young people, and their families, treat each other with respect and are comfortable about sharing concerns.



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Role of the Designated Safeguarding Team

Last Updated : June 2025

Designated Safeguarding Lead

Choosing the Designated Safeguarding Lead

Spectrum Gaming will have at least one person within the charity who is a 'Designated Safeguarding Lead' (DSL), they may also be referred to as the 'Safeguarding Lead'. The person will:

- Be an employed member of the Spectrum Gaming
- Have been recruited within the guidelines of 'Safer Recruitment'.
- Have attended a DSL Training Course.

The People

The Designated Safeguarding Leads are named below and can be contacted via team@spectrumgaming.net by parents/carers and professionals, or via Workplace for staff members.

Andy Smith
Chief Officer (Strategy & Vision)

Benjamin Wilson
Chief Officer (Operations & Development)

Responsibilities

- The DSL is the first point of contact for all staff and volunteers to go for advice if they are concerned about a child (this may also need to be out-of-hours).
- They have a higher level of safeguarding training and knowledge than the rest of the staff and will continually enhance this.
- They support staff to assist in information regarding concerns and support decision making about whether staff concerns are sufficient to



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notify Children's Social Care or whether other courses of action may be appropriate.

- They make formal referrals to the Social Services Duty & Assessment Team (local to the person of concern).
- They ensure concerns are logged correctly.
- They have joint responsibility with the Senior Management and Board of Trustees to ensure that the organisation's Safeguarding Bundle is kept up-to-date regularly and adhered to throughout the charity.
- They are responsible for promoting a safe environment for children and young people.
- They know the contact details of the relevant agencies, i.e. Social Care, Police, Local Authority Designated Officer, Local Safeguarding Children's Board and schools.
- Coordinate the distribution of policies, procedures and safeguarding resources throughout the organisation.
- Communicating with families on the policies and procedures, as well as any concerns or referrals where appropriate.
- Complying with any Local Safeguarding Children Partnership (LSCP) requirements.
- Ensuring Spectrum Gaming has sufficient safer recruitment procedures.
- Being aware of any children who have specific safeguarding needs and/or have specific vulnerabilities.

It is **not the responsibility** of the DSL to decide whether or not a child has been abused or not. That is the responsibility of investigative statutory agencies such as Children's Social Care or the Police. However, keeping children safe is everybody's business and all staff should know who to go to and how to report any concerns they may have about a child being harmed or at risk of being harmed.

The Designated Safeguarding Lead is registered with the Bury Safeguarding Children's Board.

Other Safeguarding Roles

Spectrum Gaming may also recruit additional roles to support the wider implementation of its safeguarding strategy. These may deputise for the DSL or have organisational or strategic duties beyond that of the DSL, however the DSL retains the overall responsibility for acting on and responding to safeguarding incidents.



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Lead Trustee for Safeguarding

The lead trustee for safeguarding will be a volunteer from within the board who has skills, experience and confidence in the area of safeguarding. The lead trustee for safeguarding usually takes on three main sets of duties related to safeguarding in addition to their wider responsibilities as a trustee.

Strategic

- Consider the organisation's strategic plans and make sure they reflect safeguarding legislation, regulations specific to your activities, statutory guidance, and the safeguarding expectations of the Charities Commission.
- Work with the Creative Director and Designated Safeguarding Lead regularly to review whether the things the organisation has put in place are creating a safer culture and keeping people safe.

Effective Policy and Practice

- Make sure there is an annual review of safeguarding policies and procedures (ensuring their implementation & effectiveness) and report this to trustees.
- Call for audits of qualitative and quantitative data (either internal or external) when they're needed.
- Oversee safeguarding allegations against staff or volunteers, together with Creative Director and Designated Safeguarding Lead. Support the DSL with all serious safeguarding cases.
- Be a point of contact for staff or volunteers if someone wishes to complain about a lack of action in relation to safeguarding concerns.

Creating the Right Culture

- Support the trustees in developing their individual and collective understanding of safeguarding.
- Attend meetings, activities, projects to engage with staff, volunteers and beneficiaries to understand safeguarding on the ground. Attend relevant safeguarding training events and conferences as needed.
- Support regular safeguarding updates for staff, volunteers and beneficiaries.



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The Lead Trustee for Safeguarding are named below and are contactable by staff via Workplace.

Pia-Sophie Wool
Safeguarding Trustee

Sarah-Jane Snape
Safeguarding Trustee

Deputy Safeguarding Officers

Spectrum Gaming may choose to recruit additional Deputy Safeguarding Officers, who will also undertake the DSL training. These will be staff from within our community with a good understanding of safeguarding and an active knowledge of the issues and challenges our young people are facing. They will likely be a first point of contact for staff and young people in relation to safeguarding incidents, however will always refer and report to the DSL

The Deputy Safeguarding Officers are named below and can also be contacted via safeguarding@spectrumgaming.net by parents/carers and professionals, or via Workplace for staff members.

Alison Blackley
Online Team Manager

Kirstie McStay
Operations Support Manager

Hanna Venton-Platz
Wellbeing Manager (Clinical
Psychologist)

Jimmy Hunt
Digital Youth Worker (Community
Coordinator)



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Dealing with disclosures or concerns from or about children or young people

Last Updated : June 2025

Dealing with a disclosure or concern

Dealing with a disclosure or a concern can often be quite emotional – especially if they are coming directly from the child. It is important that you remain calm and professional.

Children can make disclosures, allegations and share information in a variety of ways. They could be laughing, crying, appearing shy or just behaving in their normal way. It is important that we make our initial assessments on **what** is being said and not **how** it could be portrayed.

<p>They could be "normal"</p>  <p><i>Perhaps they are just chatting and they say something that they didn't mean to, or that they needed to get off their chest.</i></p>	<p>They could be crying or distressed</p> <p><i>Perhaps they are really emotionally affected or scared about what they're saying.</i></p> 
<p>They could be laughing</p>  <p><i>Perhaps they think what has happened is funny and don't understand the potential severity.</i></p>	<p>They could be "shy"</p> <p><i>Perhaps they are worried or embarrassed about what they are going to say.</i></p> 

Every situation that is dealt with is different. Here is some initial guidance on what to do during that moment when the child is sharing information.



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Do's:

- listen carefully to what the child tells you and remember as much information as possible
- speak to another adult and a DSL (Designated Safeguarding Lead) as soon as possible
- make a note of the facts, and any direct quotes from the young person
- collect screenshots of conversations where it's possible to do so
- ensure a Safeguarding Report is completed via CPOMS
- call 999 if a child is in immediate danger
- tell the child you will pass the information on

Don'ts:

- tell the child that you will keep any secrets
- make any promises to the child
- allow the child to convince you they will 'be okay', you have a duty of care to report this
- investigate the matter on your own
- withhold any information from your superiors or the authorities. You may only have a very small part of the puzzle.
- confuse information that is given as fact vs that which is speculation or conjecture (please see [5 : Recording & Sharing Safeguarding Information](#))





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Managing allegations against staff or volunteers

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Recognising and Responding to an Allegation

Allegations may arise from a number of sources:

- A child or an adult
- A parent/carer
- A member of the public
- Professional body
- Police / Children's Social Care

There are different procedures for responding to allegations or complaints. Care needs to be taken to ensure that correct procedures are followed. As a general guide, allegations refer to information or concerns which suggest a child or children has been avoidably hurt or harmed by an adult who owed them a duty of care, anything else is likely to fall under our complaints policy.

These procedures should be applied when there is an allegation that a person who works with a child has:

- Behaved in a way that has harmed a child, or may have harmed a child;
- Possibly committed or is planning to commit a criminal offence against or related to a child;
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children

This applies if the allegation is about a current incident or has occurred historically.



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What to do if an allegation is made

If a child is at immediate risk of harm or has suffered harm and needs urgent help, the emergency services should be contacted immediately. If the child does not require urgent help consider the below steps.

The person who receives the initial allegation should record;

- the name of the individual who the allegation is about and any other identifying information, including the location.
- the name(s) of any children involved.
- the date and time of the allegation.
- the name and contact details of the person making the allegation.
- key information about the nature of the allegation, distinguishing clearly between facts and opinions.

They should then immediately contact a DSO or DSL and provide to them the collected information and agree the next steps to be taken to safeguard the young person. If the allegation is about a DSL/DSO, the Safeguarding Trustee should be the next contacted person or another appropriate Safeguarding Officer.

A DSL/DSO should then:

- Obtain full details of the allegation, and record this information formally, with date and time information.
- Record any other information and names of any potential witnesses.
- Consider any information already known about those involved.
- Check any incident or log books, i.e. CPOMS.
- On the basis of these factors, make a professional judgement, and record the reason for any subsequent action taken.



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Procedures need to be applied with common sense and judgement. Some allegations will be so serious as to require immediate referral to Children's Social Care and the Police for investigation. Others may be much less serious and at first sight may not seem to warrant consideration of a police investigation, or enquiries by Children's Social Care. However, it is important to ensure that even apparently less serious allegations are followed up and recorded, and that they are examined objectively by someone independent of the organisation concerned;

Referrals to the LADO

Subsequently, the Local Authority Designated Officer (LADO) should be informed of all allegations that come to Spectrum Gaming's attention and appear to meet the threshold. The threshold is met when the person who works with children has:

- Behaved in a way that has harmed a child, or may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children.

The procedures apply to situations when:

- There are suspicions or allegations of abuse by a person who works with children in either a paid or unpaid capacity - as a permanent, temporary or agency staff member, contract worker, consultant, volunteer, approved foster carer, childminder or approved adopter
- It is discovered that an individual known to have been involved previously in child abuse, is or has been working with children.

The LADO should also be informed of any allegations that are made directly to the Police or to Children's Social Care;

The LADO should first establish, in discussion with Spectrum Gaming, that the allegation is within the scope of these procedures and may have some foundation. If the parents / carers of the child concerned are not already aware of the allegation, the LADO will also discuss how and by whom they should be informed. In circumstances in which the Police or Children's Social Care may need to be involved, the LADO should consult those colleagues about how best to inform parents. However, in some circumstances Spectrum Gaming may need to advise parents of an incident involving their child straight away, for example if the child has been injured whilst in the organisation's care and requires medical treatment;



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If the allegation meets any of the criteria above or is unsure about the action to take - the DSL / CEO should report it to the LADO within 1 working day. The important issue is for a Designated Safeguarding Lead to assess the level of risk against the criteria. In the event that the DSL is unclear about what action to take i.e. he/she is unsure whether or not the issue meets the criteria, then the LADO is available for support and advice.

If emergency action is required to safeguard or protect the child concerned, the usual child protection procedures will take precedence. Contact with the LADO should not be delayed in order to gather information;

If out-of-hours contact the Emergency Duty & Assessment Team (EDT) for further information and advice. The EDT contacted should be the one local to the child concerned, you can search by postcode for the correct contact details [here](#)

Suspension and Disciplinary Proceeding

Suspension is not automatic and must be properly considered. It is not a default option. The possible risk of harm to children posed by an accused person needs to be effectively evaluated and managed. In some cases, this will require Spectrum Gaming to consider suspending the person.

Suspension should be considered:

- in any case where there is reason to suspect a child is at risk of significant harm,
- the allegation warrants investigation by the police
- is so serious it might be grounds for dismissal.

A discussion between Spectrum Gaming and the LADO should consider any potential misconduct or gross misconduct on the part of the accused staff member and take into account:

- Information provided by the Police and/or Children's Social Care.
- The result of any investigation or trial and the different standard of proof in disciplinary and criminal proceedings.

Spectrum Gaming will then make a decision on the appropriate action to take.

Action in respect of unfounded or malicious allegations



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Where an allegation has been determined as unfounded, this may be a strong indicator of abuse elsewhere requiring further exploration. Spectrum Gaming will refer the matter and inform the LADO as to whether the matter should be referred to Children's Social Care.

If an allegation has been deliberately invented or malicious, the police will be asked to consider whether any action might be appropriate against the person responsible.

If it is decided on the conclusion of the case that the person who has been suspended can return from work Spectrum Gaming will outline and agree a plan with the employee.

Referral to Disclosure & Barring Service

If the allegation is substantiated, and on conclusion of the case, the person is dismissed or Spectrum Gaming ceases to use the person's services, or the person resigns or otherwise ceases to provide his/her services, the LADO should consult with Spectrum Gaming as to whether a referral to the Disclosure & Barring Service is required.

If deemed appropriate, Spectrum Gaming will make this referral within one month.



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Recording & Sharing Safeguarding Information

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Recording Information

Spectrum Gaming uses **Child Protection Online Management System (CPOMS)** to record safeguarding information. CPOMS is an online management system and is used to report and manage the following:

- Safeguarding / Child Protection Concerns
- Intelligence & Important Parent / Child Notes
- Accident / Incidents Logs
- Bullying Reports
- Behaviour Logs & Exclusion Decisions

The system allows users to log an incident that will automatically alert the Designated Safeguarding Leads/Officers and other safeguarding trained staff who can then take and record the appropriate action.

1) How to access the system:

From any web-enabled device please enter the following link into a browser:

spectrumgaming.cpoms.net

2) How to log in:

- Enter your credentials. If you do not know these – speak to your DSL.
- If you have Two Factor Authentication enabled (DSO/DSL & Safeguarding Staff) then please open your CPOMS Authenticator App and click 'Send code to CPOMS'.
- If you do not have Two Factor Authentication enabled, click '**Login without Two Factor Authentication**'



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The screenshot displays two side-by-side login panels. The left panel, titled 'Spectrum Gaming', features a purple circular logo at the top. Below it, the 'Identity' section includes a text input field with 'email@spectrumgaming.net', a password field with masked characters and an eye icon, and a purple 'Login' button. Below the button are links for 'Forgotten your password or using CPOMS for the first time?', 'Can't log in?', and 'Got a new device?'. A yellow box at the bottom contains the text: 'We advise against the use of autofilled passwords on shared computers.' The right panel, titled 'Two Factor Authentication', also has a purple circular logo. It contains instructions: 'Open the CPOMS authenticator app and authorise this request, otherwise enter the code manually into the field below if your device is not connected to the internet.' Below this is a text input field for the 'Authentication code' and a purple 'Authenticate' button. At the bottom, there is a link for 'Login without Two Factor Authentication' and a note: 'If you no longer have access to any of your two factor authentication devices, please contact a colleague with administrator access who will be able to remove your keys for you.'

3) How to add an incident

- i) Click on 'Add incident' in the header
- ii) Add the name of the child into the 'Student Name' field. If the name of the child does not appear then you can add them to the system or contact a DSO/DSL for support.
- iii) Complete the form with as much detail as possible.
- iv) For help with how to write-up an incident, please see the next page.
 - Select all the categories that your report applies to, if you are unsure speak with a DSO/DSL for support. If you believe the incident is a serious concern you should speak with a DSO before submitting the report.
 - You can link 'students' if others are involved. (You cannot add new members in this area, you will need to contact a DSO/DSL for them to be added later)




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- Depending on the category type different team members will be notified, please check all who need to be alerted have been included, you can add additional staff if you feel they need to be aware.
- Upload any attachments or screenshots you feel supports the incident record.

v) Click '**Add Incident**'.

4) How to correctly write a report

It is an absolute priority to record the information using CPOMS. This should be done at the first available opportunity and never later than the end of the working day.



RECORDING THE INFORMATION

Complete strangers may need to read your notes, this includes Social Workers, Police or a Judge.

Who's Trish?

Where?

Who's John?

What does that mean?

How do you know?

Who's Ash or Mark?

What were his exact words?

DO be specific
DO be factual
DO write all direct quotes IN CAPITALS
DO use full names and proper titles

TRY THIS INSTEAD

John's Mum (Trish) arrived at youth centre and shouted at John. So, step-dad (Mark) took Mum away from the Youth Club. John went inside the building and said to Ashley (Youth Worker) "I'M REALLY SCARED AND I DON'T WANT TO GO HOME".



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FACT OR OPINION?

Facts and Opinions are very different and must be justified. If you need to put an opinion you must explain why you think it is relevant

I think John is scared



John was crying, rocking and shaking. He appeared to be upset. I feel that from how John reacted he is scared of his Mum.



RECORDING YOUR ACTIONS

You need to record who you've spoken to and what they said. It's really important to be specific. Social Services, Police, etc all deal with lots of calls.

I rang us and spoke to Janet, she said someone would call me back soon



I spoke with Janet Smith at the Emergency Duty Team and explained the situation. She advised that the family were open to services and that Katie Upton (Social Worker) would call me back on Monday to discuss.



If you are submitting screenshots or other evidence of what was said there may not be a need to quote the full conversation. It may be easier to provide a summary of what was said / took place and allow the additional information to be read separately.

Recording the information via CPOMS does not necessarily mean you are done with the incident, you may still have a responsibility to follow it up:

- Ensure that the intended recipients have received the alert.
- Seek their confirmation that the situation is being dealt with.
- You are welcome to ask what the next steps are.

You should only submit a report once you are confident that you have followed the instructions provided in Safeguarding Bundle -[3 : Dealing with disclosures/concerns from a young person](#)



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Sharing Information

Information sharing is an important aspect of safeguarding our young members at Spectrum Gaming. Serious Case Reviews often record that a failure to share information has been a key factor. It is important however, that the information is shared legally.

Seeking consent and making it clear to parents

Spectrum Gaming makes it clear to parents that we have a general duty to share information with other agencies where we have safeguarding concerns, which in the case of a genuine concern would overwrite our responsibility to seek consent. However, for minor concerns, consent must be sought directly from parents on a case-by-case basis; a general statement does not replace the need to ask for consent when required.

Spectrum Gaming believes in working in partnership with parents and carers so that we can share information with other agencies with the parents' knowledge and consent.

When making a referral to social care, Spectrum Gaming should seek the consent from the child's parent/carers. However, the duty to refer overrides this, as the safety of the child is paramount.

Seeking consent is not required, if to do so would:

- Place a person at increased risk of harm (usually the child, but also other people).
- Prejudice the prevention, detection or prosecution of a serious crime or,
- Lead to an unjustifiable delay in making enquiries.

Recording consent decisions

Spectrum Gaming will record the request for consent and the outcome. Where the parent refuses to consent or is not asked, Spectrum Gaming will record the decision to share information without consent and give the reasons.



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Safer Recruitment

Last Updated : June 2025

Aims & Objectives

The aims of the Safer Recruitment Policy are to help deter, reject or identify people who might abuse children and young people or are otherwise unsuited to working with them by having appropriate procedures for appointing staff.

The aims of Spectrum Gaming's recruitment policy are as follows:

- To ensure that the best possible staff are recruited on the basis of their merits, abilities, and suitability for the position.
- To ensure that all job applicants are considered equitably and consistently.
- To ensure that no job applicant is treated unfairly on any grounds including race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, disability or age.
- To ensure compliance with all relevant legislation, recommendations and guidance including the statutory guidance published by the Department for Education (DfE), Keeping Children Safe in Education - September 2015, the Prevent Duty Guidance to England and Wales 2015 and any guidance code of practice published by the Disclosure and Barring Service.
- To ensure the organisation meets its commitments to safeguarding and promoting the welfare of children and young people by carrying out all necessary pre-employment checks.

Staff involved in the recruitment and selection of staff are responsible for familiarising themselves with and complying with this policy.

The organisation has a principle of open competition in its approach to recruitment and will seek to recruit the best applicants for the job. The recruitment and selection process should ensure the identification of the person best suited to the job based on the applicant's abilities, qualification, experience in merits as measured against the job description and person specification.

The recruitment of staff will be conducted in a professional, timely and responsive manner and in compliance with current employment legislation, and relevant safeguarding legislation and statutory guidance.



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If a member of staff involved in the recruitment process has a close personal or familial relationship with an applicant, they must declare it as soon as they are aware of the individual's application and avoid any involvement in the recruitment and selection decision-making process.

The first step to safeguarding the welfare of children and young people at Spectrum Gaming is to ensure that all staff and volunteers working for the organisation are appropriate, trained and vetted for their role. This 'Safer Recruitment' Policy outlines our standards and expectations (in line with the NSPCC's Safer Recruitment guidance) and the procedures recruiting staff must follow.

Recruitment Training

All Staff involved in job advertisement, recruitment, interview, and induction should be trained in Child Safeguarding and therefore understand the necessity of safe and fair recruitment.

The Member of Staff leading the process should have completed Safer Recruitment training and demonstrate a good current knowledge of the organisations HR & Equality Policies, Safer Recruitment Policy alongside their legal obligations.

Advertisement

If Spectrum Gaming is recruiting externally and is publicly advertising for a vacant post, we endeavour to reach a wide and varied field of applicants. All advertisements will make clear our commitment to Safeguarding and promoting the welfare of children. From the first point of contact all documentation will be treated in accordance with GDPR Regulations.

Posts that are exempt under The Rehabilitation of Offenders Act 1974, or make those on the Children's Barring List ineligible will make this clear at advertisement to prevent accidental or improper applications.



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Job Description and Person Specifications

A Job Description is a key document in the recruitment process and must be finalised prior to taking any other steps in the process. It will clearly and accurately set out the duties and responsibilities of the job role.

The Person Specification is of equal importance and influences the selection decision. It details the skills, experience, abilities, and expertise that are required to do the job. The Person Specification will include specific reference to suitability to work with children or within a charity that's core purpose is to work with children and young people.

Recruitment Process - Summary

- 1. Expression of Interest / Introduction (optional)**
- 2. Application Form / CV / Personal Statement**
- 3. Interview / Formal Meeting**
- 4. Conditional Offer of Employment**
- 5. Reference Collection (2 references) & Verification**
- 6. Background/Right to Work Checks & DBS**
- 7. Formal Offer of Employment**
- 8. Induction & Training**



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Recruitment Process – Further Details

1. Expressions of Interest and Professional Introductions

This is the only 'optional' step in the recruitment process. It is listed here and clarified to distinguish an 'introduction' from a formal 'application'.

This step is an opportunity for Spectrum Gaming to register the interest from an applicant wishing to be part of the organisation. It might be a face-to-face or digital introduction or could be completed through an online contact or registration form. This step is most relevant to potential applicants who are already known to Spectrum Gaming (not as an employee/volunteer), or those who show an interest in open positions within Team SG (i.e. volunteering opportunities) and ensures that applicants can be directed to the correct recruiter for the role and the start of a formal relationship between the applicant and the organisation.

At this point Spectrum Gaming may ask disqualifying questions about the applicant's suitability for the post. This 'first encounter' is a prime opportunity to make sure applicants will be able to meet the requirements of the role, and will not be immediately ineligible for the role or disqualified from working with the organisation through criminal record, barring list status, residency status, age or similar.

2. Submission of Application Form or CV & Personal Statement

Application forms should be specific to the role, and as a minimum will include questions on:

- **Personal Contact Details**
- **Reasons for Applying**
- **Employment History**
- **Education / Training**
- **References Contact Details**



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Spectrum Gaming requires every potential employee or volunteer to submit information on their personal contact details, reasons for applying, employment and education history and contact details for references. This can be submitted through Spectrum Gaming's application form online, or through a CV & Personal Statement. Applicants submitting an incomplete application will not be shortlisted until all the required information has been received.

The post advert and application form will include the applicant declaration regarding convictions and working with children and will make it clear that the post is exempt from the provisions of the Rehabilitation of Offenders Act 1974.

It is unlawful for the charity to employ anyone who is barred from working with children. It is a criminal offence to any person who is barred from working with children to apply for a position at this charity. All applicants will be made aware that providing false information is an offence and could result in the application being rejected, or summary dismissal if the applicant has been selected, and referral to the police and/or the DBS.

3. Interviews or Formal Meetings

This step allows Spectrum Gaming to ask additional questions, to ascertain the suitability of candidates for the desired role, and scrutinise information gathered during Step 2. Questions should be relevant to role and will normally cover topics such as:

- **Scrutiny of Application Form / CV**
- **Competency and Suitability for the role**
- **Specific or Relevant Experience**
- **Problem Solving Skills**
- **Decision Making Skills**

The questions and responses for the interview / meeting must be recorded as part of the applicant's file.

These meetings will be a face-to-face interview wherever possible and must have a minimum of three adult representatives from Spectrum Gaming present. At least one member of any interviewing panel will have undertaken safer recruitment training. The interview panel can be made up of people from anywhere in the organisation, however they should be able to make fair and objective observations about the candidate and



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ideally will bring a different experience and perspective to the interview. The panel could consist of:

- Trustee or Executive Level Staff
- The applicants future Line Manager
- HR or Subject Experts
- Potential future colleagues or direct reports.
- Stakeholders (i.e., young people / parents)
- External Consultants or Professionals

The interview process will explore the applicant's ability to carry out the job description and meet the person specification. It will enable the panel to explore any anomalies identified in their application and satisfy that the chosen applicant meets the safeguarding criteria (in-line with Safer Recruitment Training).

Any information regarding past disciplinary action, allegations, cautions or convictions can be discussed and considered in the circumstances of the individual case during the interview process, if it has been disclosed on the application form.

All applicants who are invited to interview should bring evidence of their identity, address, and professional qualifications which the charity deems a requirement of the post. Original documents will only be accepted, and copies may be taken. Unsuccessful applicants' documents will be destroyed six months after the recruitment programme.

4. Conditional Offer of Employment

At this point it may be suitable to make a conditional offer of employment to a candidate subject to successful completion of further tasks such as references, DBS & Background checks.

This offer is not legally binding, but outlines an intent to employ the applicant upon receipt of:

- Verification of the applicant's identity.
- The receipt of two references (one of which must be from the applicants most recent employer) which the charity considers to be satisfactory.
 - Where the position amounts to regulated activity, the receipt of an Enhanced Disclosure from the DBS with which the charity deems satisfactory
 - Where the position amounts to regulated activity confirmation that the applicant is not named on the Children's Barred List.



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- Verification of the applicant's medical fitness in relation to the role.
- Verification of the applicant's right to work in the UK.
- Any further checks which are necessary because of the applicant having worked outside of the UK.
- Verification of professional qualifications which the charity deems a requirement of the post, which the applicant otherwise cites in support of the application.

5. References

All offers of employment will be subject to receipt of a minimum of two references which are considered satisfactory by the charity. References are gained to provide objective and factual information about the applicant that should align with their own provided information.

One of the references must be from the applicant's current or most recent employer, school, or college. Wherever possible at least one reference should be from a previous role where the applicant worked with children, or with/for an organisation that works with children. If the role applied for works directly with young people and the applicant does not have any appropriate references, this should be investigated.

Some organisations do not provide full references for previous employees and may only supply a 'basic' or 'HR' reference stating basic information about when the employee worked for them and in what role. Some organisations may refuse to provide a reference for an employee, this may be company policy or may be specific to this person and should be investigated with the previous employer. References from family members, HR References or Open References will not ordinarily be accepted, instead seek references from.

- Current or former managers or supervisors
- Current or former colleagues
- Education professionals
- Business Contacts, Customers or Clients
- Other professionals who can provide a character reference.

References will always be sought and obtained directly from the referee and their purpose is to provide objective and factual information to support appointment decisions. All referees will be asked whether they believe the applicant is suitable for the job to which they've applied and whether they have any reason to believe that the



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applicant is unsuitable to work with children. (Please note that no questions will be asked about health or medical fitness prior to any offer of employment being made)

All references should be verified by phone or email with the referee to confirm they have submitted it, and any negative comments or concerns investigated further. At least one referee should be a professional referee and have worked with the candidate, ideally in the past 3 years.

6. Background Checks

Spectrum Gaming will conduct background and DBS checks on all persons applying for a role within Spectrum Gaming. The type and level of the checks will be appropriate to their role within the organisation; All persons must have completed the minimum of a Basic DBS Check. All paid roles must have a Right to Work check.

Spectrum Gaming will accept an existing DBS, if that person is subscribed to the Update Service, providing the following criteria is met:

- A copy of the original DBS is viewed and kept
- Valid I.D, preferably Passport has been seen
- Permission has been given by the individual (given when they provide us with their Update number)
- We are legally entitled to the same level of DBS certificate- standard or enhanced.
- The DBS only contains the exact workforce we are entitled to know about. In relation to Spectrum Gaming, this will be the child workforce. Adult or child and adult workforce will not be acceptable.
- A copy of the status check must be kept.

DBS Checks

Under the The Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (Schedule 1, Part II, Section 14), most positions at Spectrum Gaming would be exempt from the act falling under *“Any employment by a youth club, local authority or other body which is concerned with the promotion of leisure or recreational activities for persons under the age of 18, being employment, which is of such a kind as to enable the holder to have access to such persons in the course of his normal duties.”*



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Therefore, The Rehabilitation of Offenders Act 1974 would not apply to positions which involve working with or having access to children and young people. Therefore, any convictions or cautions that would normally be considered spent must be declared when applying for positions at Spectrum Gaming.

The charity will apply for an Enhanced Disclosure from the DBS and check the Children's Barred List for all positions at the charity which are eligible as a 'Regulated Activity', as defined in Safeguarding Vulnerable Groups Act 2006. If not eligible for an Enhanced check, Spectrum Gaming will instead request a Basic DBS Check.

The purpose of carrying out an Enhanced DBS Check is to identify whether an applicant is barred from working with children by inclusion on the Children's Barred List and whether they have any previous convictions or cautions which would make them inappropriate to take post.

It is the charity's policy that a DBS disclosure must be obtained before the commencement of employment of any new staff member. Spectrum Gaming **WILL** temporarily accept a valid DBS certificate completed for another organisation that has been issued less than three years ago under the following conditions:

- These members of staff **MUST NOT** be allowed to work unsupervised with any children or young people
 - A new certificate should be issued within 4 weeks of their start date
 - They are still in the employment of the organisation who issued the certificate, and a reference has been received from them.

It is the charity's policy to re-check our staffs' DBS certificates every three years and in addition any staff member who takes leave for more than 3 months (i.e. maternity leave) before they return to work. DBS checks will still be requested to applicants with recent periods of overseas residence and those with little or no previous UK residence.

Members of staff at Spectrum Gaming will be made aware of their need to inform the Designated Safeguarding Lead of all cautions or convictions that arise between these checks taking place.

Applicants should bring their certificate to the Designated Safeguarding Lead within seven days of issue.



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a) Definition of Regulated Activity and Frequency

Any position undertaken at, or on the half of the charity will amount to “Regulated Activity” if it is carried out:

- Frequently, meaning once a week or more; **or**
 - Overnight, meaning between 2 AM and 6 AM; **or**
 - Satisfies the “period condition” meaning three times or more in a 30-day period.
- and
- Provides the opportunity for contact with children.

The charity is not permitted to check the Children’s Barred List unless an individual will be engaging in “regulated activity” and meets the frequency requirements.

Spectrum Gaming can also carry out an Enhanced DBS (without Barring List) check on a person who carries out regulated activity, however, doesn’t meet the time requirements, but does have contact with young people on an ‘irregular’ basis.

b) Dealing with convictions

The charity operates a formal procedure if the DBS certificate is returned with details of convictions.

Consideration will be given to the Rehabilitation of Offenders Act 1974 and also:

- The nature, seriousness and relevance of the offence(s).
- How long ago the offence occurred.
- One-off incidents/a history of offences/offending.
- Changes in circumstances
- Decriminalisation and remorse.

A formal meeting will take place face-to-face to establish the facts with the Designated Safeguarding Lead. A decision will be made following this meeting. In the event that the relevant information (whether in relation to previous convictions or otherwise) is volunteered during the recruitment process or identified through a disclosure check, the Designated Safeguarding Lead will evaluate the risk factors above before a position is offered or confirmed.



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The outcome of this meeting and the recommendation of the DSL will be put forward to the board of Trustees and Creative Director for a final decision to be made. A record of these meetings and communication will be placed in the employee's permanent file.

If an applicant wishes to dispute any information contained in a disclosure, they may do so by contacting the DBS. In cases where the applicant would otherwise be offered a position were it not for the disputed information, the charity may, where practicable and at its discretion, defer a final decision about the appointment until the applicant has had a reasonable opportunity to challenge the disclosure information.

Right to Work Checks *(Only required for paid roles)*

Under the Immigration Asylum and Nationality Act (2006), employers have a legal duty to show that their employees have a legal right to work in the United Kingdom, or face fines or potential imprisonment. Volunteers do not need to prove their right to work, however it would be good practice to collect this information anyway in case their employment status should change in the future.

The documentation that would prove that the bearer has the legal right to work in the UK includes but is not limited to.

- A passport (current or expired) showing the holder is a British Citizen or citizen of the UK and colonies, having a right to work in the UK.
- A passport (current or expired) showing the holder is a citizen of the Republic of Ireland
- Another biometric ID, passport or document showing that the holder is exempt from immigration control and that the holder has the right to stay in the UK indefinitely
- A birth or adoption certificate issued in the UK, Channel Islands, Isle of Man or Ireland, together with an official document giving the person's permanent National Insurance number and their name issued by a government agency or a previous employer
- A certificate of registration or naturalisation as a British citizen, together with an official document giving the person's permanent National Insurance number and their name issued by a government agency or a previous employer.



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There are many other forms of valid ID or documentation that give an employee a right to work in the UK, and additional guidance and checking systems can be found online via the GOV.UK website by searching “Right to Work Checks”

A copy of this document should be held in the employee’s permanent file. If the employee only has a temporary or limited time right to work, the employer should ensure that further checks are completed on their right to work status when required.

7. Formal Offer of Employment

A formal offer of employment will be made with details such as start date and salary to be confirmed in writing.

Once Spectrum Gaming has received all the information requested (listed in Step 4 – Conditional Offer of Employment), the employee can then start their employment with us, and complete their induction process.

At this point, if it has not already been completed each employee (*not required for voluntary roles*) should sign a ‘Contract of Employment’ which will state.

- Name of the Organisation
- Employees Name
- Job Title and Start Date
- Rate of Pay and Hours of Work
- Holiday / Sick Pay arrangements
- Notice Periods
- Pension / Pension Schemes
- Other relevant Policy/Procedures.

This contract should be used in line with the employees ‘Employment Pack’ to determine the role & responsibilities of the employee / volunteer.

8. Induction Programme

Finally, prior to starting their role all staff and volunteers will undertake an individual and tailored programme of training and induction. This would, in most cases, include the topics:

- **About Spectrum Gaming – History, Development & Future**
- **Vision, Mission and Values**



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- **Commitment to Safeguarding**
- **Standards and Expectations**
- **Code of Conduct**
- **Operational Procedures / Policies**
- **IT Systems**

All employees will be given an induction by an appropriate Member of Staff, this will normally be a member of the SLT, however areas of this induction may be delegated to other Senior competent and knowledgeable staff members, depending on the role.

As a minimum this induction will include information on Safeguarding, Standards and Expectations and a Code of Conduct, which will be signed by the employee and the staff member leading the induction.

The induction process will be tailored to the role and will endeavour to cover all the information a new volunteer or employee needs to satisfactorily cover their role and undertake their duties, in line with Spectrum Gaming's policies & procedures. In some cases, it may be appropriate to divide the induction process into smaller stages, delivered at different times. This should be noted on the applicants file in relation to the induction, and their current progress and status.

Records should be kept on what information, IT access, documentation, keys, uniform, and ID items that have been provided to staff to ensure that in the event of a staff member's departure from the organisation, the same can be retrieved or destroyed.



SAFEGUARDING BUNDLE

Digital Safeguarding

Last Updated : June 2025

Introduction

This policy has been written in conjunction with CEOP materials. It has been adapted to reflect the charity's own decisions on balancing benefit with potential risks. This e-safety policy will be used in conjunction with Data Protection, Anti-Bullying, and Safeguarding policies.

This policy specifically covers all online and digital activities performed by Spectrum Gaming, plus all digital activities undertaken on behalf of the charity at a local level, on proprietary platforms and third-party social media and devices.

This includes but is not limited to email; social media channels (such as Facebook, Twitter, YouTube, Instagram, WhatsApp, TikTok, LinkedIn); all blogging platforms; adult staff systems; and other digital platforms such as Discord, Google Hangouts and Zoom; all ICT devices (including phones) and internet connectivity that is provided by the charity.

This policy explains our approach to protecting members, volunteers and staff. We are constrained by the terms of service of third-party social media providers in our approach. We promote safe use, but we also recognise that some issues will only be resolved by changes to those platforms

Potential Online Risks

Risks might manifest as online abuse, bullying, threats, impersonation, grooming, harassment or exposure to offensive and/or violent content.

All of these are harms we have a duty to protect young people from – and we shouldn't underestimate its seriousness. If young people are exposed to, or perpetrate, these behaviours, they can be life-altering.

- A systematic, large-scale review of academic research found that victims of cyberbullying are more than twice as likely to self-harm or attempt suicide. There have been high-profile news stories about online grooming and its devastating effects



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- According to Ofcom, 45% of 12-15s who go online say they have seen something hateful about a group of people online in the last 12 months.
- Children may be exposed to upsetting or inappropriate content online, particularly if the platform you're using doesn't have robust privacy and security settings or if you're not checking posts. This content might be sexually explicit or it might be harmful in other ways, such as radicalisation, bullying, or content that's upsetting.
- Children may be at risk of being groomed if they have an online profile that means they can be contacted privately, 30% of young people say they have been contacted by a stranger seeking friendship.
- Children's posts or profile information may expose personal information and put them at risk. For example, they may talk about their home life, feelings, or thoughts they've been having. There may be information that makes them identifiable such as locations of events they are taking part in or visual clues in photographs. Perpetrators may use this information to groom, abuse or exploit children.
- Perpetrators of abuse may create fake profiles to try to contact children and young people through the platform you're using, for example an adult posing as a child. They may also create anonymous accounts and engage in cyberbullying or trolling. People known to a child can also perpetrate abuse.
- On many platforms, children can be contacted anywhere and at any time through private messaging or notification alerts. This means it's harder for them to escape from abusive messages or upsetting content that they are tagged in.

Aims and Objectives

Our aims are to ensure that all children & young people:

- will use the internet and other digital technologies to support, extend and enhance their communication, engagement & learning.
- will develop an understanding of the uses, importance and limitations of the internet and other digital technologies in the modern world including the need to avoid undesirable material.
- will develop a positive attitude to the internet and develop their ICT capability through both independent and collaborative working.
- will use existing, as well as up and coming, technologies safely.



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- will develop an understanding of the uses, importance and limitations and risks of the internet.
- will report inappropriate web content, content they find upsetting or distressing, or content that is seeking to put them at risk.

Our aims are to ensure that all staff & volunteers:

- will ensure that content we make available to young people is safe and subject to age-appropriate filtering.
- will take editorial responsibility and ensure that content is accurate and appropriate.
- will select content that includes children/young people carefully and obtain permission from parents/carers before publishing any content that includes personal or identifying information.
- will use approved methods of communication with young people and communicate via SG managed accounts (i.e Discord/Email)
- will read and sign the e-safety and acceptable use policies before using any charity ICT resource.
- will supervise the content created by young people within our systems and will moderate its use. Challenging or removing inappropriate content reported to us.
- will respond to concerns or complaints made by staff, young people or parents.
- will review our systems and their usage then suggest changes and improvements.

Our aims are to ensure that all parents & carers:

- will agree to their children using the internet (in accordance with our Internet Safety guidelines) during our provision.
- will support their children to read through and understand the Internet Safety Guidelines and our rules for using our online systems.
- will supervise their children's usage of our systems and will support the SG staff team when responding to incidents.
- will ensure their children understand usage of our systems is monitored at all times.



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Responding to Complaints

- CPOMs should be used for all complaints or concerns relating to e-safety. (See guidance [5 : Recording & Sharing Safeguarding Information](#))
- Instances of internet misuse or data breaches should be reported to the Online Team Manager.
- Instances of staff internet misuse should be reported to, and will be dealt with by, the Chief Officers.
- Complaints of a safeguarding or child protection nature must be dealt with in accordance with charity child protection procedures.

Responsibilities For Internet Safety

Chief Officers

- Responsible for e-safety issues within the charity but may delegate the day-to-day responsibility to other members to the Online Team Manager and Digital Youth Work Team.
- Ensure that the Board of Trustees is informed of e-safety issues and policies.
- Ensure that appropriate funding is allocated to support e-safety activities throughout the charity.
- Develop procedures to keep young people safe on specific online platforms such as Discord/Minecraft/Live Streams etc.

Board of Trustees

- E-Safety will be reviewed as part of the regular review of child protection and health and safety policies.
- Support the Chief Officers and/or designated Managers in establishing and implementing policies, systems and procedures for ensuring a safe ICT environment.
- Ensure that appropriate funding is authorised for online safety solutions, training and other activities as recommended by the Chief Officers and/or designated online safety trustee (as part of the wider remit of the Trustees with regards to charity budgets).



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Digital Youth Workers and other Staff / Volunteers

- Contribute to the development of e-safety policies.
- Adhere to acceptable use policies.
- Take responsibility for the security of data.
- Develop an awareness of e-safety issues, and how they relate to children in their care.
- Model good practice in using new and emerging technologies.
- Embed e-safety education in our service delivery.
- Know when and how to escalate e-safety issues.
- Maintain a professional level of conduct in their personal use of technology, both within & outside charity.
- Take responsibility for their professional development in this area.

Parents and Carers

- Contribute to the development of e-safety policies.
- Read acceptable use policies and encourage their children to adhere to them.
- Adhere to acceptable use policies when using the charity internet and/or IT systems.
- Discuss e-safety issues with their children, support the charity in its e-safety approaches and reinforce appropriate behaviours at home.
- Take responsibility for their own awareness and learning in relation to the opportunities and risks posed by new and emerging technologies.
- Model appropriate uses of new and emerging technologies.
- Liaise with the charity if they suspect, or have identified, that their child is conducting risky behaviour online.



Safeguarding Bundle

Anti-Bullying for Young People

14 Jun 2023

Introduction

This anti-bullying policy provides guidance to staff and children, parents and carers of Spectrum Gaming on preventing, responding to and reducing bullying.

Definitions of Bullying:

Bullying and unkindness whether physical or emotional is entirely unacceptable at Spectrum Gaming. It conflicts with the charity's principles and we will always treat it seriously.

Bullying is a behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally.

Bullying may be related to prejudice-based attitudes and behaviour which may compound other differences or difficulties in a child or young person's life.

Bullying behaviours can include:

- Name calling, teasing, putting-down or threatening and intimidating by making prejudice-based remarks
- Hitting, tripping, pushing, kicking
- Stealing and damaging belongings
- Ignoring, excluding and spreading rumours
- Sending abusive messages electronically, e.g. via text message or social media
- Making people feel fear
- Targeting someone

Aims & Objectives

Spectrum Gaming bases itself on inclusivity and understanding, and most important providing a safe space that is free from prejudice. We are committed to providing a safe and caring environment for all young people and staff. This environment must be free of disruption, violence and any form of harassment. Effective support will be offered for children and their parents who are affected by bullying.



Safeguarding Bundle

Prevention Of Bullying

Spectrum Gaming will work to create a positive and supportive ethos. A culture that encourages love, respect and discipline where differences can be celebrated and positive relationships encouraged. This is manifested by:

- Effective use of our NEST Approach.
- Creative and motivational ways to encourage children to engage with peers.
- Raising awareness of bullying through sessional based activity.
- Encouraging children to report bullying immediately.
- An online 'Support Ticket' tool for reporting bullying.

Action

The member of staff to whom the incident is first reported, or who has witnessed the incident, should take the incident seriously. They must use their professional judgement in deciding upon appropriate action based on the impact of the bullying behaviour on the child or young person.

The child or young person who has experienced bullying behaviour will receive appropriate support and protection.

Examples of good practice include:

- Listen to the child carefully
- Confirm that bullying is never acceptable
- Gentle encouragement towards the child for them to talk.
- Take notes.
- Report via CPOMs.
- Inform parents.

When a child or young person has displayed bullying behaviour, a member of the team should, based on their professional judgement, endeavour to manage the resolution of the bullying incident within the organisation. Parents should be involved when their active support is needed to implement a resolution of the bullying incident.

Such action might include:

- Use of the NEST approach for problem solving the route of the behaviour
- Support from the staff team for the victim and perpetrator.
- Restorative Approaches, i.e. mediation with children and/or parents



Safeguarding Bundle

- Exclusions from our communities or activities.

Bullying In The Wider Community

Spectrum Gaming cannot be held responsible for bullying that takes place in the wider-community. However, if a child's emotional and physical wellbeing has been compromised, as a duty of care to that child, it may be appropriate for a member of the staff team to play some part in resolving incidents.



SAFEGUARDING BUNDLE

Code of Conduct for Visitors

Last Updated : June 2025

Dear Visitor,

We are looking forward to welcoming you to one of our activities so that we can showcase to you the best of Spectrum Gaming

As we hope you would expect, the safety of our children and young people is a top priority. Therefore, we ask you to read the following guidelines and adhere to them during your visit. Please complete the form overleaf as an acknowledgement that you have understood and bring this form with you on your visit.

We encourage you to engage and enjoy your time with our young people. You are requested to follow the lead of our staff team, but are welcome to approach young people for conversation and discuss their involvement with Spectrum Gaming and our activities. We would also encourage you to engage in any activities we have going on with the young people.

We acknowledge that some of these guidelines may seem common sense; but we hope you share our values on ensuring our children are kept safe at all times.

Thank you,

Spectrum Gaming

Code of Conduct for Visitors to Spectrum Gaming

You must:

- Where possible, wear your company uniform and/or identification.
- Upon arrival, report immediately to a staff member from Spectrum Gaming who will make the Leader-in-Charge aware of your presence.
- Use language and conversation topics that are appropriate to a child-friendly environment.
- Remain with your allocated host and/or the group.
- Actively plan and organise your movements to 'shadow' a Spectrum Gaming staff member.



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- Allow us to formally introduce you to the children and explain why you are present. This will reassure them that you are legitimately in attendance and encourage them to engage with you.
- Report anything that concerns you to the Leader-in-Charge.

You must not:

- Be alone with a child at any time.
- Enter any private spaces, i.e. bedrooms, tents, children's toilet facilities
- Use language, make suggestions or offer advice which:
 - ○ Is explicit
 - ○ Is not age appropriate
 - ○ You do not have the qualifications/ experience to advise on
- Ask children for any personal information or make attempts to communicate with them away from this setting. Do not send or accept any social media requests from a young person.
- Make unnecessary physical contact with a young person.
- Behave physically in a manner which is sexually provocative.
- Condone or participate in any behaviour that is illegal, harmful or abusive.
- Act in ways intended to humiliate, shame, belittle or degrade children.
- Discriminate in any way.
- Take any photographs or screenshots without permission from Spectrum Gaming.

If you are unsure about any of these guidelines then please do not hesitate to make contact with your Spectrum Gaming Representative who will be happy to give further explanation.

DECLARATION

I, the undersigned, confirm that I have read and understood the above Code of Conduct for my visit as detailed below.

Location of Visit:	
Date of Visit:	
Name of Visitor:	
Signature & Date:	



SAFEGUARDING BUNDLE

Code of Conduct for Staff & Volunteers

Last Updated : June 2025

Spectrum Gaming takes the welfare of its children and young people extremely seriously.

During all times when working for Spectrum Gaming the following should be adhered to. Breaching this Code of Conduct will likely result in you being removed from the organisation. Depending on the seriousness of the breach this could be a permanent removal or until further training is given.

Staff Must:

- Be aware of situations that present risk (to them or others) and manage these.
- Be aware of health and safety in the workplace to keep yourself and others safe.
- Always be transparent in regard to your work with children and young people.
- Think about the impact of your actions on other people.
- Ensure that a culture of openness exists to enable any issues or concerns to be raised and discussed
- Ensure that a sense of accountability exists between staff so that poor practice or potentially abusive behaviour does not go unchallenged.
- You must report to your line manager and the Designated Safeguarding Lead if you:
 - *are charged and/or found guilty of a criminal offence or accept a caution for any offence (this does not include fixed penalty notices for a road traffic offence, or a ticket issued by a local council, unless these are relevant to your role, i.e., you drive a company vehicle and received points on your licence).*
 - *are the subject of any investigation and/or sanction due to concerns about your behaviour towards children.*
 - *are subject to any disciplinary sanctions or are asked to leave employment or voluntary activity due to inappropriate behaviour towards children.*



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Staff Must Never:

- Aggressively shout at a child unless they are in immediate danger.
- Hit or otherwise physically assault or abuse children.
- Develop close, personal relationships with children rather than professional relationships.
- Develop physical/sexual relationships with children.
- Act in ways that may be abusive or may place a child at risk of abuse.
- Use language, make suggestions or offer advice which:
 - Is explicit
 - Is not age appropriate
 - You do not have the qualifications/ experience to advise on
- Behave physically in a manner which is sexually provocative.
- Have a child with whom they are working stay overnight at their home.¹
- Support children with personal care that they can do for themselves.
- Condone or participate in behaviour, which is illegal, harmful or abusive.
- Act in ways intended to humiliate, shame, belittle or degrade children.
- Discriminate in any way.
- Add a child or young person on any personal social media accounts.
- Store a child or young person's mobile phone number on their personal phone **OR** communicate with them from a personal telephone (landline or mobile) unless pre-authorised for good reason by a manager.
- Bring the organisation into disrepute by publicising strong political views, their sexual activities or illegal/harmful activities on any social media platform or otherwise.

In general, it is inappropriate to:

- Take photographs or videos, at any location, of a child you are working with on a personal mobile phone without prior consent from a manager.
- Spend time alone face to face with a child you are working with without informing a manager and having just cause.
- Engage with children you are working with outside of your working remit.

Incidents that must be recorded/reported:

- If you accidentally hurt a young person.
- If they are highly distressed by your actions.
- If a young person develops romantic feelings/ obsessive behaviours towards, or feels threatened by a staff member.
- If you are concerned about the behaviour of another member of staff or young person.

¹ Unless the child is a direct relation **or** they are a friend of your child (this applies in the cases where staff are also parents).



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CODE OF CONDUCT AGREEMENT

I have read and agree to abide by the code of conduct and safeguarding policies during my time at Spectrum Gaming.

Print Name

Signed (Staff Member)

Date

Signed (Senior Manager)

Date



SAFEGUARDING BUNDLE

Complaints Policy & Procedures

Last Updated : June 2025

Scope of the Policy

Our goal at all times is to treat people fairly and equitably. If you feel that we have not met that standard, please let us know. Where there is reason to believe our conduct has fallen short, we want to be able to resolve any issues and learn from what has happened so that we can continuously improve.

Spectrum Gaming aims to be a learning organisation. We want to find out what we are doing well and what we are doing badly – so that we can do even better in the future. So we welcome feedback from our service users. Praise and blame are equally useful.

If you are puzzled or concerned by any actions we have taken, we always invite an open conversation to help explain anything we have done in advance of a more formal complaint being made, this would obviously not affect your ability to follow up with a formal complaint at a later date.

As an Equal Opportunities organisation, we aim to treat everyone on their merits - irrespective of age, disability or other conditions, race, ethnic or national origin, gender, marital status, sexuality, dependants or class. If you believe we may have discriminated against you on such grounds, we would be very concerned and would welcome the chance to investigate your complaint thoroughly.

It is important that complaints are raised at the earliest possible opportunity to enable the matter to be dealt with speedily and effectively. An early informal approach is often the best means of resolution of minor problems. Following industry standards we would consider 3 months to be an acceptable timeframe to lodge a complaint.

Complaints submitted anonymously will be considered if there is enough information in the complaint to enable Spectrum Gaming to make further enquiries. If, however, an anonymous complaint does not provide enough information to enable us to take further action, we may decide not to pursue it further. However, we may give consideration to the issues raised, and will record the complaint so that corrective action can be taken as appropriate.



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Finally, this policy is designed for the use of parents/carers, young people, professionals or others directly working with Spectrum Gaming either as an organisational partner, or as a service user. Generally the complaint would be about the conduct, actions or omissions of members of staff employed at Spectrum Gaming, or the standard of response to an incident, allegation or safeguarding concern.

Complaints Procedure

The procedure is intended to provide a quick, simple and streamlined procedure with a strong focus on early investigation and resolution by our staff team. The procedure involves up to two stages, details of which are explained below.

Stage 1 - 'Direct Resolution' (DR) seeks to resolve straightforward complaints swiftly and effectively at the point at which the complaint is made, or as close to that point as possible.

Stage 2 - 'Complaint Investigation' is appropriate where a complainant is dissatisfied with the outcome of DR, or where DR is not possible or appropriate due to the complexity or seriousness of the case.

Stage 1: Direct Resolution

(to be completed within five working days)

Anyone who has a complaint is encouraged to raise it initially at the point of, or as close to the point of, becoming aware of it as possible and to raise it directly with the area of the organisation where the complaint occurred.

Complaints at this stage may be made face-to-face, by phone, in writing or by email.

The purpose of direct resolution is to attempt to resolve as quickly as possible complaints which are straightforward and require little or no investigation. Complaints at this stage of the process may be addressed by any relevant member of the Charity's staff and may be handled by way of a face-to-face discussion with the complainant, or by asking an appropriate member of staff to deal with the complaint.



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Members of staff to whom complaints are made will consider some key questions:

- Is this a complaint or should the individual be referred to another procedure?
- What specifically is the complaint (or complaints) about and which area(s) of the Charity is /are involved?
- What outcome is the complainant hoping for and can it be achieved?
- Is this complaint straightforward and likely to be resolved with little or no investigation?
- Can the complaint be resolved on the spot by providing an apology / explanation / alternative solution?
- If I cannot help, can another member of staff assist in seeking a direct resolution?
- What assistance can be provided to the complainant in taking this forward?

Resolution may be achieved by providing an on-the-spot explanation of why the issue occurred and/or an apology and, where possible, what will be done to stop this happening in the future.

If responsibility for the issue being complained about lies in the staff member's area of work, every attempt will be made to resolve the problem at source. If responsibility lies elsewhere, the staff member receiving the complaint will liaise with the relevant area rather than simply passing the complainant on to another office.

We will give you our decision at Stage 1 within five working days unless there are exceptional circumstances.

Our response will:

- clearly outline our decision providing clear, evidence based reasons for this decision,
- Respond openly to all of the substantive points raised by a complainant and explaining why the organisation considers these points justified or not,
- Take responsibility for the actions of our staff and those acting on behalf of the organisation,
- Acknowledge if things have gone wrong and take proportionate action to put things right, including apologising where appropriate,
- Include any lesson learnt and any changes made to services, guidance or policy as a result of the complaint.



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Stage 2: Complaint Investigation

(to be completed within 20 working days)

These complaints may already have been considered at the direct resolution stage, or they may be complaints identified upon receipt as appropriate for immediate investigation. A complaint will be moved to the investigation stage when:

- direct resolution was attempted, but the complainant remains dissatisfied.
- the complainant refuses to recognise or engage with the direct resolution process and is insistent that the issue be addressed by a more senior member of staff;
- the issues raised are complex and will require detailed investigation;
- the complaint relates to issues that have been identified by the Charity as high risk or high profile. Special attention will be given to identifying complaints considered high risk or high profile, as these may require particular action or may raise critical issues requiring direct input from senior management.

Potential high risk /high profile complaints may:

- involve a death or serious injury;
- involve serious service failure
- generate significant and on-going press interest;
- pose a serious operational risk to the Charity;
- present issues of a highly sensitive nature.

A person can make a complaint in writing, in person, by telephone, by email, online or by having someone complain on their behalf.

Where it is clear that a complaint will need to be considered at the investigation stage rather than through direct resolution, the complainant may be asked to submit their complaint formally in writing along with any attached documentation. If they cannot write it down and would prefer to complain in person, the complaint process can be completed with them and a letter to confirm the scope of the complaint issued to them.

The purpose of conducting an investigation is to establish all of the facts relevant to the points made in the complaint and to provide a full, objective and proportionate response to the complainant that represents Spectrum Gaming's definitive position.



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Stage 2 : The process for staff

The Charity will: allocate the complaint to a Senior staff member or Trustee (this will ordinarily be the General Manager or Creative Director).

It is important to be clear from the start of the investigation stage exactly what is being investigated, and to ensure that both the complainant and the investigator understand the scope of the investigation. In discussion with the complainant, three key questions should be considered:

1. What specifically is the complaint (or complaints)?
2. What does the complainant hope to achieve by complaining?
3. Do the complainant's expectations appear to be reasonable and achievable?

If the complainant's expectations appear to exceed what the Charity can reasonably provide or are not within the Charity's power to provide, the complainant will be advised of this as soon as possible in order to manage expectations about possible outcomes.

Details of the complaint must be recorded and where the complaint has been through the direct resolution stage this must be shown in the complaints log. At the conclusion of the investigation the log must be updated to reflect the final outcome and any action taken in response to the complaint.

Timelines at Stage 2 - Complaint Investigation

- complaints will be acknowledged in writing within three working days;
- the Charity will provide a full response to the complaint as soon as possible, but not later than 20 working days from the time that the complaint was received for investigation.

Where investigations will not be able to meet this deadline; for example, where they are so complex that they will require careful consideration and detailed investigation beyond the 20 working days timeline. Senior staff will exercise judgement and will set time limits on any extended investigation, with the agreement of the complainant. If the complainant does not agree to an extension, but it is unavoidable and reasonable, then senior management must consider and confirm the extension. In such circumstances, the complainant must be kept updated on the reason for the delay and given a revised timescale for bringing the investigation to a conclusion.



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Closing the complaint at the Complaint Investigation stage

The outcome of the investigation will be communicated to the complainant in writing. The decision, and details of how and when it was communicated to the complainant, must be recorded. If a complainant remains dissatisfied, there is recourse to the Charity Commission who will be able to advise on whether they may be able to assist. The charity Commission can be contacted at: <https://www.gov.uk/government/organisations/charity-commission>. If we cannot resolve a fundraising complaint, a complainant can contact the Fundraising Regulator.