

# Xpact Safeguarding Policy

## 1. Policy Statement

Xpact is committed to safeguarding and promoting the welfare of all children (anyone under 18) and adults at risk. We recognise that safeguarding is everyone's responsibility and that all individuals, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation, or identity, have the right to protection from abuse, harm, and exploitation.

We maintain a culture of vigilance and transparency, especially given the unique risks associated with mentoring in online and gaming environments.

## 2. Purpose and Scope

This policy:

- Sets out our safeguarding principles and procedures
- Applies to all staff, mentors, contractors, volunteers, and partners
- Covers both face-to-face and digital interactions
- Ensures compliance with UK safeguarding legislation and guidance, including KCSIE 2025

## 3. Definitions

- Child: Anyone under the age of 18
- Adult at Risk: An adult (18+) who has needs for care and support and is at risk of abuse or neglect
- Abuse: A form of maltreatment of a child or adult, which can be physical, emotional, sexual, financial, or through neglect
- Online Abuse: Abuse that occurs through digital platforms including gaming, messaging apps, and video conferencing

## 4. Safeguarding Roles and Responsibilities

Designated Safeguarding Lead (DSL)

The DSL has lead responsibility for safeguarding and child protection. They are supported by a Deputy DSL.

All Staff and Mentors must:

- Read and understand this Safeguarding Policy
- Attend safeguarding training as required
- Immediately report any concern about a child or adult at risk

- Maintain appropriate professional boundaries at all times

## 5. Types of Abuse

We recognise the following forms of abuse:

- Physical abuse
- Sexual abuse
- Emotional abuse
- Neglect
- Child sexual exploitation (CSE)
- Child criminal exploitation (CCE)
- Radicalisation
- Online and peer-on-peer abuse
- Financial or institutional abuse (for adults at risk)

We are also aware of gaming-specific risks, including:

- Grooming through voice chat or messaging
- Coercion or blackmail through in-game interactions
- Exposure to inappropriate content
- Excessive monitoring or surveillance risks

## 6. Online and Gaming Safeguarding

Xpact provides mentoring via gaming platforms, which presents unique risks and responsibilities.

We ensure:

- All interactions occur on approved platforms with appropriate moderation
- All mentors undergo Enhanced DBS and online conduct checks
- No private or unmoderated communication is permitted between mentors and mentees
- All staff and mentors receive online safety training specific to digital mentoring

Children and families are provided with guidance on safe use of technology and how to report concerns.

## 7. Reporting and Responding to Concerns

If a child or adult at risk is in immediate danger, call 999.

Otherwise, all concerns (including suspicions, disclosures, or inappropriate behaviour) must be reported to the Designated Safeguarding Lead as soon as possible.

The DSL will:

- Assess the risk and nature of the concern
- Record the issue securely and accurately
- Liaise with relevant agencies (e.g. LADO, police, social services)
- Keep involved individuals informed as appropriate

No concern is too small to report.

## 8. Confidentiality and Record-Keeping

- All safeguarding concerns are logged securely and separately from other records
- Information is shared on a need-to-know basis in accordance with the Data Protection Act 2018 and GDPR
- Children and adults at risk are informed about how their information is used

## 9. Safer Recruitment

Xpact follows a strict Safer Recruitment Policy including Enhanced DBS checks, reference checks, and safeguarding-focused interviews. No one will be permitted to work with children or vulnerable adults without appropriate vetting.

## 10. Training and Induction

All staff and mentors receive:

- Mandatory safeguarding induction
- Regular refresher training (annually at minimum)
- Specific modules on online risks, gaming platforms, and digital boundaries

DSLs receive advanced, accredited safeguarding training renewed every two years.

## 11. Whistleblowing

Xpact promotes a culture of openness and accountability. Staff are encouraged to raise concerns about:

- Unsafe practices

- Suspicions of abuse or misconduct by colleagues
- Inadequate safeguarding measures

Concerns can be raised directly to the DSL or externally to the NSPCC Whistleblowing Advice Line (0800 028 0285).

## 12. Partnerships and Third Parties

Any external organisations, contractors, or partners working with or on behalf of Expat must:

- Agree to this Safeguarding Policy
- Provide evidence of appropriate safeguarding training and DBS checks
- Cooperate fully with any safeguarding audits or checks

## 13. Monitoring and Review

This policy is reviewed annually and updated in line with changes to legislation, best practice, or organisational structure.

- Policy Owner: E Collins
- Last Reviewed: October 2025
- Next Review Due: October 2026

## 14. Key Contacts

- DSL Name: E Collins
- Deputy DSL Name: H Staron