

Global Safeguarding Policy

Version	Date Updated	Description
1.0	May 2022	Initial release
2.0	February 2024	General updates

Introduction

At Cambridge University Press & Assessment (“Cambridge”) we believe that our organisational goals should never be achieved at the expense of high ethical standards. We believe all people should be treated with dignity and respect. Cambridge has a zero tolerance approach to all forms of bullying, harassment, sexual exploitation and abuse.

Cambridge aims to promote the safeguarding and wellbeing of all individuals we work with and for. This ideal extends to our employees, our business partners, our learners, our authors and the citizens of the communities where we operate. We strive to protect children and other vulnerable people in our interactions with them, speak up where we have concerns, and promote safeguarding through the products and services we offer.

The purpose of this global policy is to set out the principles that guide our approach to protecting children, young people, and adults at risk from harm to ensure individuals can enjoy and benefit from their learning and assessment with the minimum risk of a safeguarding issue arising.

This policy applies to all employees, temporary and agency staff, consultants, contingent workers, contractors, freelancers, and assessment specialists providing services to Cambridge in all geographical locations.

Policy Statement

Cambridge aims to protect individuals by providing a safe and trusted environment; providing effective support and training for employees; using safe recruitment practices and completing necessary background checks, communicating our principles with third parties and sharing concerns with relevant agencies. We also aim to promote safeguarding through the products and services we provide.

What is Safeguarding?

At Cambridge, safeguarding is the act of putting policies, procedures, training and appropriate people in place to minimise the possibility of abuse and to deal appropriately with concerns when they arise. Cambridge takes its responsibility to safeguard and promote the welfare of children, young people and adults at risk very seriously. To this end, we have developed this policy to ensure that we:

- Set out clear expectations of the behaviour required of our employees and third parties who provide services to Cambridge
- Have clear procedures in place to ensure that all safeguarding concerns get referred to the right people, are recorded and handled appropriately.
- Have clear guidelines as to what to do if someone contacts us with an allegation.
- Ensure that police and Disclosure and Barring Service (DBS) check requirements are known and met for all relevant employees and third parties.
- Review Safeguarding procedures every year.

Cambridge is committed to ensuring our approach is consistent with national and international disclosure obligations, and shall comply with all applicable UK laws, regulations and codes, as well as all applicable laws in any country in which we operate.

Definitions

A child or young person is defined as a person below the age of 18 as set out in the United Nations Convention on the Rights of the Child¹.

Abuse is defined as any behaviour which intentionally treats another person in a cruel or violent way. This includes but is not limited to, emotional, financial, physical and sexual abuse.

An adult at risk is defined in section 59 of the UK Safeguarding Vulnerable Groups Act 2006 as a person aged 18 or over who:

- is living in residential accommodation, such as a care home or a residential special school,
- is living in sheltered housing,
- is receiving domiciliary care in his or her own home,
- is detained in a prison, remand centre, young offender institution, secure training centre or attendance centre or under the powers of the Immigration and Asylum Act 1999,
- is in contact with probation services,
- is receiving a welfare service of a description to be prescribed in regulations,
- is receiving a service or participating in an activity which is specifically targeted at people with age-related needs, disabilities or prescribed physical or mental health conditions or expectant or nursing mothers living in residential care (age-related needs includes needs associated with frailty, illness, disability or mental capacity),
- is receiving direct payments from a local authority/HSS body in lieu of social care services,
- requires assistance in the conduct of his or her own affairs.

Human Rights are defined as rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion or any other status. In relation to children, we respect the UN Convention on the rights of the child.

Safe recruitment checks are defined as the steps we take to consider safeguarding and promoting the welfare of children, young people and adults at risk at every stage of our recruitment process. This includes writing the job description, shortlisting and interviewing applicants, and conducting pre-employment checks, screening and obtaining references, to ensure we have hired the right person.

This Policy is designed to help us avoid behaviours such as:

Grooming means the cultivation of emotional relationships with those in positions of vulnerability or inequitable power, with the intention of manipulating these relationships into sexualised dynamics in the future.

Radicalisation means the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

Sexual abuse means the threatened or actual physical intrusion of a sexual or sexualised nature, including inappropriate touching, by force or under unequal or coercive conditions, sexual assault and rape. It may also include threatened or actual non-physical intrusion (such as unwanted and/or

uninvited exposure to pornography, texts, images, the sharing of images, texts, and demands for sexualised photographs etc.).

Sexual exploitation means actual or attempted abuse of a position of vulnerability, differential power, trust, or dependency, for sexual or sexualised purposes. This includes the offer or promise of monetary, social, political benefits as an incentive or form of coercion.

Sexual favours means any sexual or sexualised acts, in exchange for something such as money, goods, services, opportunities and so on. Also includes demands for inappropriate photographs, filming, and exposure to pornography and so on.

¹ https://downloads.unicef.org.uk/wp-content/uploads/2010/05/UNCRC_united_nations_convention_on_the_rights_of_the_child.pdf

Our approach to Safeguarding

Cambridge is committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure the exploitation and abuse of children, young people and adults at risk, is not taking place anywhere in our own business or in any of our supply chains or partnerships. The wellbeing of people including children, young people and adults at risk is always the paramount consideration and will take precedence over commercial interests.

Cambridge recognises the rights of children, young people and adults at risk including:

- the right to be given the support required to be healthy, stay safe, enjoy and achieve through learning and make a positive contribution to society
- the right to protection from abuse and exploitation
- the support of all adults in their needs for care and protection from harm or abuse
- the right to study for and obtain qualifications without fear of abuse, harm or neglect.

Cambridge protects children, young people, and adults at risk through the following means:



Prevent and Protect

How we protect those who work for us and with us

Recruitment

When new members of staff are employed to work at Cambridge, either on a permanent, temporary, or freelance basis, Cambridge carries out safe recruitment checks. In accordance with our DBS Procedure, where those employees will be working directly either physically or remotely with children, young people or adults at risk, there is a requirement for a basic Disclosure and Barring Service (DBS), Disclosure Scotland or equivalent check before the employee joins the organisation. In some cases, standard or enhanced DBS checks or equivalent will be required in accordance with local legislation for example such as where an employee will be participating in a regulated activity. DBS or equivalent checks will be completed periodically after employment has commenced and will also be completed where an employee changes role.

Expectations of employees

Everyone working for Cambridge has a responsibility to familiarise themselves with our [Code of Ethics](#), this policy and the procedures that go with it. To support employees in understanding their safeguarding responsibilities Cambridge provides online safeguarding training which must be completed upon joining the organisation and refreshed every 3 years. Training is designed to help employees recognise safeguarding concerns, and understand what to do in the event they suspect or witness a safeguarding concern. For those employees in higher risk roles, enhanced training in relation to safeguarding is also required on an annual basis.

Employees must immediately report any safeguarding suspicion or incident in accordance with the Report and Respond section below. Failure to report will be treated as serious and may result in disciplinary action which may include termination of employment. Employees are expected to cooperate with any investigation.

Expectations of third parties

Third parties who work with and on behalf of Cambridge are expected to adhere to the same high ethical standards as our employees. Cambridge offer support and guidance for all third parties, and for key third parties, safeguarding training. All third parties, including agency staff, consultants, contingent workers, contractors, assessment specialists and other third parties providing services to Cambridge are subject to our third party due diligence procedures. As part of those due diligence procedures, third parties will be asked to sign up to our [Third Party Code of Conduct](#) which specifically references safeguarding. Relevant third parties may also be required to agree to contractual provisions in regards to safeguarding, which may include the right to audit any safeguarding practices, as well as being asked to provide evidence of the measures they have in place to protect children, young people and adults at risk; this can include but is not limited to providing copies of safeguarding policies, details of any safeguarding procedures that are in place and details of incident reporting procedures.

Third parties, working directly, either physically or remotely with children, young people or adults at risk, may be required to complete a basic Disclosure and Barring Service (DBS), Disclosure Scotland, if located in the UK or an equivalent check where possible for those outside of the UK, before starting work with Cambridge. This requirement applies irrespective of whether or not the third party is located or will be providing services to Cambridge, outside of the United Kingdom. In some cases standard or enhanced DBS checks or equivalent will be required in accordance with local legislation. Where appropriate, our third parties may also be required to undertake online training to ensure they have a clear understanding of their safeguarding responsibilities. For those third parties who are required to complete DBS, Disclosure Scotland or equivalent checks, these checks will be renewed periodically as appropriate to the risk level.

Third parties working with and on behalf of Cambridge must immediately report any safeguarding suspicion or incident as in accordance with the Report and Respond section below. Failure to report will be treated as serious and may result in termination of any agreement in place with Cambridge.

Personal Data

The UK regulator, the ICO, published the [Age Appropriate Design Code](#) known as the 'Children's Code' in September 2020. This Code sets out several measures to help protect children's information online. Cambridge is committed to meeting this best practice guidance and has put some measures in place to help manage our use of children's information, including:

- Child friendly privacy notices
- Collection of information through trusted adults, such as parents or teachers
- High default privacy settings applied to user accounts on our platforms

Promoting Safeguarding Externally

Cambridge seeks to promote safeguarding both internally and externally. We feature our policy on our external facing website, and train both employees and key third parties in safeguarding best practice. We take our responsibility to select appropriate material in our products seriously and work collaboratively with our schools and other partners to ensure we do so. We identify and take opportunities to promote the importance and value of safeguarding through our products, services and relationships wherever possible and appropriate. For example, to demonstrate the rationale for promoting safeguarding, we have commissioned a research project about the impact of safeguarding on outcomes for learners.

Our Research Ethics Policy aims to ensure that research activities conducted by or on behalf of Cambridge meet or exceeds generally established good practice guidelines. This includes minimising the risk of harm to research participants, some of which may be children, young people and adults at risk. We undertake research according

to our values of collaboration and responsibility, and our research work is underpinned by our commitment to rigour and an ethical approach.

Some Cambridge products require remote testing of candidates. During remote testing, all candidates will be informed of any recordings (video or audio) made of proctored assessments, the purposes for which they are made and for how long they will be retained. For under-18s the consent of a parent or guardian will be required. Where on-screen identity checks are required, all candidates will be informed of this process and how their information will be used and protected.

Cambridge has several social media accounts for connecting with customers, including but not limited to Facebook, Instagram, LinkedIn, TikTok, Twitter and YouTube:

- When using social media, employees and third parties working with and for Cambridge, must adhere to the [Global Social Media Policy](#)
- Users of social media should ensure they comply with the terms and conditions of the social media platform being used.
- Moderators of Cambridge social media accounts must be mindful of potential safeguarding issues, and have a duty to review social media accounts for inappropriate activity or cries for help to enable us to respond to safeguarding issues effectively.
- In-country Facebook, Instagram and Twitter pages often upload pictures of candidates and their certificates, or in some cases candidates/centres upload them themselves. All country offices' Facebook pages which feature candidates under 18 years of age have procedures in place to gain permission from parents/guardians before the candidates are featured on Facebook.

Cambridge always collects consent from parents or guardians for any case studies used in marketing materials which feature photos and details of people under 18 years of age, and adults at risk.

Where children, young people or adults at risk are involved in external events organised or funded by Cambridge, we will ensure that consent is collected and that this policy and any relevant procedures are followed.

Report & Respond

How we report and support those who raise a concern

Cambridge is committed to ensuring that all employees and those who work with us are clear on what steps to take, when safeguarding suspicions or concerns arise. Where concerns are raised, we ensure immediate action is taken to identify and address those concerns. We all have a responsibility to make sure that concerns about children and adults at risk are passed to the agency that can help them without delay.

Who to report to

If you are concerned that a child, young person or adult is at risk, please do not ignore your suspicions. You should not assume that someone else will take action to protect that person. If you have a concern, you can raise it via any of the following means:

- To the Cambridge Safeguarding teams²
- To our [Business Ethics and Compliance Officer](#)
- Via our confidential [Speak Up portal](#)

Please note none of these means should be used in an emergency. If a child, young person or adult at risk, is in immediate danger, please contact your local emergency services immediately.

Safeguarding concerns are managed through a robust investigation policy and procedures that support it. Information will be managed confidentially and will only be shared without consent where the duty to protect children, young people or adults at risk from harm supersedes an individual's right to privacy. Safeguarding

² [Cambridge English, Cambridge International, OCR](#)

investigations will be made in a timely manner and should not be subject to any unnecessary delays. Whilst there are steps we can take to investigate safeguarding concerns, it is acknowledged that it is not always appropriate for us to investigate. In some instances we may need to refer concerns to local authorities such as national law enforcement or back to schools. Where this is deemed necessary, we will advise those who have raised the concern. Consideration will be made in regard to the risk of reporting such concerns.

On occasion, a concern at a centre or school or during provision of any other assessment or learning may arise out of an activity that an employee or third party providing services to Cambridge is observing or carrying out. Examples include a speaking examination or a centre inspection. If an activity being observed raises cause for concern, or there is cause for concern during the carrying out of an assessment, the employee or third party providing services to Cambridge will need to consider whether the assessment or learning session should be stopped prior to completion. No activity should continue that might be seen as raising safeguarding issues, or putting anyone at risk of harm or abuse. In this situation, the employee or third party providing services to Cambridge will inform the person in charge immediately and contact the relevant Cambridge Safeguarding team. Where a cause for concern is raised in regard to an activity that is not under the control of Cambridge, such as when we are observing a learning activity for research purposes, we will immediately inform the person in charge to allow them to determine whether the activity should be stopped.

Monitoring

We are determined to keep improving our knowledge and understanding of how best to protect children, young people and adults at risk. We will review our own practice regularly to check that we are placing the right emphasis on safeguarding in our work. This includes but is not limited to:

- Regular reporting to the Executive Board, Product Group Boards and Audit Committee,
- Global Compliance Risk Assessment – annual process conducted by the Business Ethics and Compliance team in conjunction with senior stakeholders,
- Policy review – policies and procedures are reviewed alongside stakeholder/customer feedback, and any relevant updates in legislation, seeking external advice where required and updated accordingly,
- Global Anti-Bribery and Corruption review processes – completed periodically by the Business Ethics and Compliance team.

Seeking Guidance and Speaking Up

If you have any queries about safeguarding, or our approach, to protecting children, young people and adults at risk, please contact the Business Ethics and Compliance Team – compliance@cambridge.org

We believe that our organisational goals should never be achieved at the expense of high ethical standards. To ensure that Cambridge stays on the right path, we strive to make it as easy as possible to speak up when something seems amiss. We encourage our employees and everyone we work with to raise concerns, and we prohibit retaliation against anyone who reports a concern in good faith.

When reporting an issue, you should be as specific and detailed as possible so the person taking the report understands your concern. In many situations, if you are an employee, your manager will be in the best position to resolve your question or concern. However, if you are not an employee or do not want to discuss an issue with your manager, you can contact any of the people or groups listed below:

- Our Cambridge Safeguarding teams³
- [Business Ethics and Compliance Officer](#)
- If an employee, your People and Culture Team representative
- Our confidential [Speak Up portal](#)

³ [Cambridge English](#), [Cambridge International](#), [OCR](#)

What to expect if you Speak Up

If you are a Cambridge employee and raise a concern to a Line Manager they will:

- **Listen Carefully:** Remembering that the person who has approached them has done something both difficult and very important to them.
- **Respond Respectfully:** Take every concern seriously, even if they disagree or have questions about the reporter's motives. Make sure the reporter knows they are committed to addressing the issue.
- **Protect Confidentiality:** Avoid discussing the conversation with others and only share details on a need-to-know basis.

If you are either a Cambridge employee or an external third party, and raise a concern via any of the other channels described in this policy, we will:

- **Listen Carefully:** We will record a written summary of your concern and provide you with a copy for confirmation. Depending on the nature of your concern, we will also aim to give you an indication of how we propose to deal with the matter. Usually this will involve making internal enquiries first, but it may be necessary to carry out an investigation at a later stage which may be formal or informal depending on the nature of the concern raised. In certain circumstances it may also be necessary for us to report the matter to the authorities.
- **Respond Respectfully:** We will contact you as soon as possible to discuss your concern. If you wish to involve a friend or colleague to support you, please make us aware of this. Your companion must respect the confidentiality of your disclosure and any subsequent investigation. If the matter is being handled internally, we will provide you with a timeframe for updates and details of who to contact for further information.
- **Protect Confidentiality:** We will only share details of the concern raised to a small group of people on a need-to-know basis. Where possible and appropriate, we will keep you informed of the decisions that have been taken and the outcome of any enquiries/investigations that have been made. It may not be appropriate to do this in all cases; for example, we will not be able to inform you of anything which would infringe the duty of confidentiality owed to others or would compromise other open investigations or constitute a breach of data protection laws.

While we cannot guarantee that we will respond to all matters in the way that you might wish, we will handle the matter fairly and properly.