



Safeguarding Children and Vulnerable Adults Policy

Approved by:	Andrea Olver, Liz Lee
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Amended:	Liz Lee

Introduction

It is the policy of the Company to ensure that every child or young person who takes part in training can participate in a fun, safe environment and be protected from neglect and physical, sexual and emotional abuse.

The key principles that underpin this policy are:

- Anyone under the age of 18 years should be considered a child for the purposes of this document
- The child's welfare is paramount
- All children, whatever their age, culture, ability, gender, language, racial origin, religious belief and/or sexual identity, have the right to protection from abuse
- All suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately
- Clubs and other organisations will be provided with appropriate documentation and support to enable implementation of this policy
- Adults working with children will also be provided protection and guidance on best practice to safeguard them from wrongful allegations
- Working in partnership with children and their parents/carers is essential for effective protection

The Company recognises the statutory responsibility of local authority children's services to safeguard the welfare of children and is committed to working in partnership with the local safeguarding partnership and complying with all relevant multi-agency safeguarding procedures.

General Policy Statement

The Company has both a statutory and moral duty to operate in a way that safeguards and promotes the welfare of young people receiving education and training with us. Throughout this policy, the term **young people** refers to those under 18. The Company also recognises that some adults with learning difficulties are vulnerable to abuse; therefore, these procedures also apply to allegations involving vulnerable adults.

The Company is committed to ensuring that we:

- Provide a safe environment for young people to learn in
- Identify young people who are suffering, or likely to suffer, significant harm
- Take appropriate action to ensure such young people are kept safe, both at home and within the Company

To achieve these aims, the Company will approve and annually review policies and procedures designed to:

- Raise awareness of welfare issues and promote a safe learning environment

- Support the identification of young people at risk and provide clear reporting processes
- Establish procedures for reporting and managing allegations against staff
- Ensure safe recruitment of staff

The Company will refer concerns that a child, young person or vulnerable adult may be at risk of significant harm to the local authority Children’s Services, Adult Social Care Services, the police, or—where concerns relate to radicalisation—to the Prevent / Channel safeguarding process.

The Managing Director, Liz Lee, holds initial responsibility for child protection issues until a suitably trained member of staff is appointed. She will undertake appropriate training and ensure knowledge is shared with all staff.

All directors and staff working with young people will receive safeguarding training, with refreshers at least every three years.

The Company recognises the following definitions of abuse:

Physical Abuse

Causes harm to a child’s body and may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning or suffocating.

Neglect

Persistent failure to meet a young person’s basic physical and/or psychological needs, resulting in serious impairment of health or development.

Sexual Abuse

Involves forcing or coercing a young person to participate in or watch sexual activity. A child’s apparent consent is irrelevant.

Emotional Abuse

Persistent emotional ill-treatment or rejection that causes severe and lasting effects on behaviour and emotional development.

Radicalisation

The Company follows the Prevent strategy and may make referrals to the Channel Programme where appropriate. Radicalisation can occur in any community and often involves grooming and exploitation by others.

Possible indicators of abuse include:

- Uncharacteristic changes in behaviour or commitment
- Peer group gossip
- Unexplained bruises or injuries
- Signs of discomfort or pain
- Poor hygiene or unkempt appearance
- Unexplained weight loss
- Nervousness when approached
- Fear of particular adults
- Requests to switch tutors without reasonable cause
- Inappropriate sexual awareness
- Social isolation
- Reluctance to go home

The presence of these signs is **not** proof of abuse, but concerns must be followed up. It is **not** the tutor's role to decide if abuse is occurring—only to report concerns.

Designated Staff with Responsibility for Safeguarding

The designated senior member of staff with lead responsibility for safeguarding is **Liz Lee**.

She is responsible for:

- Overseeing referrals of suspected abuse, radicalisation or allegations to external agencies
- Providing advice and support to staff on child protection matters
- Maintaining proper records of referrals, complaints or concerns
- Ensuring parents are aware of the Company's safeguarding policy
- Liaising with relevant agencies
- Liaising with employers and training organisations hosting young people on placements
- Ensuring staff receive safeguarding training and understand Company procedures

Dealing with Disclosure of Abuse and Reporting Concerns

Safeguarding procedures follow national statutory guidance and local multi-agency safeguarding arrangements. The Local Authority Designated Officer (LADO) provides advice and oversees the management of allegations against individuals working with children. Liz Lee will liaise with the LADO and relevant safeguarding partners as required.

If a young person discloses possible abuse to a member of staff:

- Listen carefully and remain calm
- Do not interview the child; ask only necessary questions for clarity
- Do not put words into the child's mouth
- Reassure them that telling you was the right thing
- Explain that you must pass on the information and tell them who you will report it to
- Record the main points using the child protection proformas
- Make a detailed record including date, time, location, what was said, what was observed, and any questions asked
- Refer to the Appendix for more detail

Staff must **not** investigate concerns themselves; they must report immediately to **Liz Lee**.

Reporting and Dealing with Allegations of Abuse Against Members of Staff

These procedures apply to all staff, including teaching, administrative, management, support staff and volunteers.

Introduction

In rare circumstances, staff within educational settings have been found responsible for child abuse. Because staff frequently work closely with young people, allegations of abuse may arise. The Company recognises that such allegations can be made for various reasons and may or may not be true. It is essential that anyone receiving or handling an allegation maintains an open mind and ensures that all concerns are dealt with promptly, proportionately and without unnecessary delay.

The Company also recognises the principle set out in the Children Act 1989, which establishes that the welfare of the child is the paramount consideration. At the same time, it is acknowledged that mishandling an allegation can cause significant and lasting harm to a staff member's reputation, well-being and career. For this reason, all allegations will be managed sensitively, fairly, and in accordance with statutory safeguarding guidance and local multi-agency procedures.

Receiving an Allegation from a Child

A member of staff who receives an allegation about another staff member from a young person should follow the disclosure guidelines outlined in Section 3.

The allegation must be reported immediately to **Liz Lee**, unless she is the subject of the allegation, in which case it should be reported to a **Programme Manager**.

Liz Lee should:

- Obtain written details of the allegation, signed and dated by the person receiving it
- Countersign and date the written account
- Record relevant information, including times, dates, locations and names of any potential witnesses

Initial Assessment by Liz Lee

Liz Lee should conduct an initial assessment of the allegation, consulting with Programme Managers, the Managing Director, and the **Local Authority Designated Officer (LADO)** as appropriate.

Where the allegation indicates potential criminal behaviour, or suggests that a child has suffered, is suffering or is likely to suffer significant harm, the matter must be referred **immediately to the LADO**, who will advise on next steps, including any required police involvement.

Liz Lee must **not** investigate the allegation. Her role is solely to gather initial information to determine whether the allegation meets the threshold for further action under safeguarding or disciplinary procedures.

Possible outcomes of the initial assessment include:

- **The allegation concerns inappropriate behaviour or poor practice**, rather than criminal conduct or a safeguarding risk. In this case, the matter should be addressed under the Company's disciplinary procedures.
- **The allegation is clearly false**, and the facts could not possibly be true.

Enquiries and Investigations

Child protection investigations by social services or police must not be confused with internal disciplinary procedures. The Company may use the results of external investigations as part of its own processes.

The Company will suspend any internal enquiries while formal investigations by external agencies are ongoing, as continuing internally may prejudice the case. Internal procedures will resume once external investigations conclude.

If an external investigation occurs, Liz Lee should participate in strategy discussions. She must ensure the Company supports external enquiries and maintains appropriate confidentiality. She should advise the staff member involved to seek representation.

Subject to approval from external agencies, Liz Lee will:

- Inform the young person or parent/carer that an investigation is occurring

- Inform parents/carers that an allegation has been made and outline the likely process
- Inform the staff member of the allegation and explain the investigative process

Liz Lee will maintain a written record of all actions taken.

Suspension of Staff

Suspension is **not automatic** and may be considered at any stage. It is a neutral act and should occur on full pay. Alternatives should be explored, such as:

- Paid leave of absence
- Temporary change in duties
- Agreement to refrain from attending work

Suspension should only occur when:

- A young person may be at risk
- Allegations are serious enough to constitute potential gross misconduct
- Suspension is necessary for the integrity of the investigation

If suspension is being considered:

- The staff member should be encouraged to seek advice
- Liz Lee should interview the staff member (with approval from the local safeguarding partnership and, if applicable, the police or the Disclosure and Barring Service (DBS)).
- The member of staff may be accompanied by a friend or representative
- They must be informed of the allegation and potential suspension, and be given the opportunity to respond

If suspension proceeds:

- A written notice must be issued within one working day
- SMT should be informed with minimal detail
- Parents/carers of the young person should be informed and asked to maintain confidentiality
- Relevant senior staff should be notified where necessary
- Consideration will be given to communication with students and/or parents, ensuring publicity is managed carefully

The Company will also:

- Keep the staff member updated during suspension
- Provide appropriate support
- Review suspension regularly under Company disciplinary procedures

The Disciplinary Investigation

The disciplinary process will follow formal Company disciplinary procedures.

The staff member will be informed of:

- The disciplinary charge
- Their right to representation

If no disciplinary action is taken after suspension, the suspension will be lifted immediately and return-to-work arrangements made.

The young person and their parents should be informed of the outcome before the staff member returns.

Liz Lee will consider what information, if any, should be shared with the wider student community.

Allegations Without Foundation

False allegations may indicate issues of abuse elsewhere. A record must be kept and consideration given to referring the matter to LADO.

Liz Lee will:

- Inform the staff member verbally and in writing that no further action will be taken
- Consider offering counselling or support
- Inform the parents/carers of the alleged victim of the outcome
- Where the allegation came from another young person, consider informing their parents/carers
- Prepare a report explaining why the allegation was unfounded and confirming actions taken

Records

Documents relating to investigations must be retained securely, including the final outcome. If disciplinary action occurs, relevant documents must be stored on the staff member's confidential personnel file.

Two staff recording forms are available for use and must be stored safely.

If a staff member resigns or is dismissed before the safeguarding process concludes, they must be informed that the Company has a statutory duty to make a barring referral to the Disclosure and Barring Service (DBS), in line with current UK safeguarding legislation.

Monitoring Effectiveness

Where an allegation has occurred, Liz Lee and the SMT will review the case after completion of all procedures to determine whether policies or processes require improvement. Consideration will also be given to staff training needs.

Recruitment and Selection Procedures

The Company maintains recruitment and selection procedures, reviewed regularly and based on the following principles:

- Applies to all staff and volunteers working with young people
- Posts and roles must be clearly defined
- Key selection criteria must be identifiable
- Vacancies should be widely advertised to encourage diverse applicants
- Documentary evidence of academic/vocational qualifications must be required
- Professional and character references must be obtained
- Employment history must be verified
- DBS checks must be completed for all staff prior to working with students
- A range of selection techniques should be used (e.g., qualifications, experience, interview, reference checks)

Appendix 1 – Responding to Complaints and Alleged or Suspected Incidents

Abuse may become apparent in a number of ways:

- you may observe signs in a student that lead you to suspect that they have been physically, emotionally, or sexually abused, or suffer severe neglect, or are becoming radicalised; or in addition in the case of a vulnerable adult, they may be experiencing financial, discriminatory or institutional abuse.
- the tables below gives examples that may indicate that an individual is being abused. In addition to these a person may be being abused by virtue of their race, gender, age, disability or sexual orientation which would indicate discriminatory abuse. Similarly, any of the examples listed may be an indication of institutional abuse if the individual is in receipt of organised care.
- the students themselves may disclose to you that they have been abused.

Possible signs of physical abuse include:

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| • Unexplained injuries or burns, particularly if they are recurrent | • Fear of medical help |
| • Refusal to discuss injuries | • Aggression/bullying |
| • Improbable explanations for injuries | • Over compliant behaviour or a 'watchful' attitude |
| • Untreated injuries or lingering illness not attended to | • Running away |
| • Admission of punishment which appears excessive | • Significant change in behaviour without explanation |
| • Shrinking from physical contact | • Deterioration of work |
| • Fear of returning home or of parents being contacted | • Unexplained pattern of absence which may service to hide bruises or other physical injuries |
| • Fear of Undressing | |

Possible signs of emotional abuse include:

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| • Continual self-deprecation | • 'Neurotic' behaviour – obsessive rocking, thumb-sucking, and so on |
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| <ul style="list-style-type: none"> • Fear of new situations • Inappropriate emotional responses to painful situations • Self-harm or mutilation • Compulsive stealing/scrounging • Drug/solvent abuse | <ul style="list-style-type: none"> • Air of detachment – ‘don’t care’ attitude • Social isolation – does not join in and has few friends • Desperate attention-seeking behaviour • Eating problems, including overeating and lack of appetite • Depression, withdrawal |
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Possible signs of sexual abuse include:

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|---|--|
| <ul style="list-style-type: none"> • Bruises, scratches, burns or bite marks on the body • Scratches, abrasions or persistent infections in the anal or genital regions • Sexual awareness inappropriate to the person’s age – shown, for example, in drawings, vocabulary, games and so on • Frequent public masturbation • Attempts to teach others about sexual activity • Refusing to stay with certain people or to go to certain places • Aggressiveness, anger, anxiety, tearfulness • Withdrawal from friends | <ul style="list-style-type: none"> • Promiscuity, prostitution, provocative sexual behaviour • Self-injury, self-destructive behaviour, suicide attempts • Pregnancy – particularly in the case of young adolescents who are evasive concerning the identity of the father • Recoiling from physical contact • Eating disorders • Tiredness, lethargy, listlessness • Over-compliant behaviour • Genital discharge/irritation • Sleep disturbance • Unexplained gifts of money • Depression • Changes in behaviour |
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Possible signs of neglect include:

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| <ul style="list-style-type: none"> • Constant hunger • Poor personal hygiene • Inappropriate clothing • Frequent lateness or non-attendance at College • Untreated medical problems | <ul style="list-style-type: none"> • Low self-esteem • Poor social relationships • Compulsive stealing or scrounging • Constant tiredness |
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Possible signs of financial abuse include:

- Loss of jewellery and personal property
- A bill not being paid when money is entrusted to a third party
- Unexplained withdrawal of cash
- Lack of money to purchase basic items
- Misuse of benefits
- Inadequate clothing
- Theft of property
- Over protection of money or property
- Loss of money from a wallet or purse

Possible signs of radicalisation include:

- The individual's views become increasingly extreme regarding another section of society or government policy
- The individual becomes increasingly intolerant of more moderate views
- The individual expresses a desire/intent to take part in or support extremist activity
- They are observed downloading, viewing or sharing extremist propaganda from the web
- They become withdrawn and focused on one ideology
- The individual may change their appearance, their health may suffer (including mental health) and they may become isolated from family, friends, peers or social groups.

If an allegation is brought to your attention:

Step 1 - Listen and Reassure

DO

- Stay calm - do not rush into inappropriate action
- Reassure the child - that they are not to blame and confirm that you know how difficult it must be to confide
- Listen and believe - to what the child says and show that you take them seriously
- Allow only one adult to talk to the child - as any discrepancies in statements may lead to legal problems
- Keep questions to a minimum - in many cases it may be more appropriate to nod and acknowledge the child's account. If you must question then use open ended questions i.e. those where more than a yes/no response is required. The law is very strict and child abuse cases have been dismissed if it appears that the child has been led or words and ideas have been suggested
- Ensure that you clearly understand what the child has said - so that you can pass it on to the appropriate agencies
- Consult with the Liz Lee - ensuring that you communicate all the information accurately
- Maintain confidentiality

In all cases if you are not sure what to do you can gain help from NSPCC 24 hour telephone on 0800 800 5000.

Step 2 -Record

Record what the child has said and/or your concerns legibly and accurately. Details should include:

- The child's name, address and date of birth
- Date and time of the incidents and/or nature of allegations
- Your observations e.g. describe the behaviour and emotional state of the child and/or bruising or other injuries
- The child's account - if it can be given - of what has happened
- Any action that you took as a result of your concerns e.g. comments made to the child, whether the parents/carers have been contacted
- Record whether the person writing the report is expressing their own concerns or passing on those of someone else

- Sign and date the report
- Keep a copy of the report

Please note that when a disclosure is made, it is the person to whom the disclosure is made that the authorities (police and/or social services) will come to for an account of what was said. This first hand account is of primary importance.

Step 3 - Involve the appropriate people

Once you have completed your report you must ensure that Liz Lee has been informed so a decision can be made as to the most appropriate action.

Do not delay.

If you are unsure what to do, you should seek advice from the Local Authority Designated Officer (LADO), who is responsible for providing guidance, oversight and coordination in all cases involving allegations against individuals working with children.

Guidelines on sharing information.

All employees shall exercise due care and discretion in divulging information relevant to the Company, including in relation to its staff, students and its premises.

Regarding safeguarding children, young adults and vulnerable adults, information shall be shared on a “need to know” basis and in line with protection policy guidelines.

Appendix 2 - Code of Conduct for People working with Children

To ensure that all forms of abuse are prevented and to help protect people who work with children and vulnerable adults, the following guidelines should be followed:

- Always be publicly open when working with children or vulnerable adults. Avoid situations where you and an individual child or vulnerable adults are completely unobserved.
- In practical sessions, if a learner needs to be touched, it should be provided openly and the learner should be asked first. Care is needed, as it is difficult to maintain hand positions when providing manual support if the child is constantly moving. Some parents are becoming increasingly sensitive about touching children and their views should always be carefully considered.
- Where possible parents should take responsibility for their children in changing rooms. If groups are to be supervised in changing rooms, always ensure that adults work in pairs.
- All staff must respect the rights and dignity and worth of all and treat everyone with equality.
- Tutors must ensure that the activities which they direct or advocate are appropriate to the age, maturity and ability of the learner.
- Tutors must consistently display high standards of personal behaviour and appearance.
- Adults should never overtly criticise learners or use sarcasm where it may cause the child to lose self-esteem or confidence.

Everyone should also be aware that as a general rule it does not make sense to:

- Spend amounts of time alone with children away from others
- Take children alone on car journeys, however short
- Take children to your home

If you accidentally hurt a child, or cause distress in any manner, or the child appears to be sexually aroused by your actions, or misunderstands, or misinterprets something you have done, report the incident as soon as possible. Parents/carers should also be informed of the occurrence.

You should never:

- Engage in rough physical or sexually provocative games, including horseplay

- Permit or engage in any form of inappropriate touching
- Permit children to use inappropriate language unchallenged
- Make sexually suggestive comments to a child, even in fun
- Allow allegations made by a child to go unchallenged, unrecorded or not acted upon
- Do things of a personal nature that a child can do for itself. However it may be necessary for a volunteer to do things of a personal nature for children particularly if they are very young or disabled. Such tasks should only be carried out with the full understanding and consent of the parent/carer. There is also a need in these instances to be responsive to the child's reactions - if a child is fully dependant upon you talking with him/her about what you are doing and give choices where possible.
- Agree to meet a young learner on your own

In addition, all vocational tutors must abide by the REPs/CIMPSA Codes of Ethical Conduct

Data Protection Act - Amac CP1 Child Safeguarding Procedure

This form is confidential. Immediately after completion, it should be placed in a sealed envelope marked “in confidence” and sent to Liz Lee, Amac					
1. Date of Disclosure/ concern:		2. Time of Meeting:			
3. Names and status of those present during the meeting:					
Name (capitals)	Initials	Status:			
4. Name of complainant:					
5. Name of child who has alleged abused or you are concerned about: (if different from above)					
6. Outline of complaint: Please note the person who is completing this form should keep questions to a minimum. This section should record as briefly as possible the nature of the allegation and / or concerns and any other relevant information.					
7. Name: (printed)		Signature:		Date:	

Amac CP2

Child Safeguarding Procedure

Report of allegation of child abuse to Social Services by the Designated Child Protection Person or Officer

1. Member of staff reporting incident:	
2. Position in college:	
3. Time of telephone call:	
4. Date of telephone call:	
5. Name of Social Services worker reported to:	
6. Position of above:	
7. Incident reported relates to CP1 form dated, relating to (name of complainant).	
8. Letter confirming telephone report has been posted 1 st class within 24 hours Yes / No	
9. If no, explain why not and give date and time of posting:	
10. Actions reported to:	
Date and Time of verbal report:	