



## **Combined Safeguarding Policy (Safeguarding Children, Young People and Vulnerable Adults)**

<b>Policy name</b>	<b>Safeguarding Policy</b>
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### **A. Statement of Purpose**

The purpose of this policy is to provide guidance to employees and volunteers of Fix It UK Ltd of their legal obligations to safeguard children, young people and vulnerable adults.

Everyone shares responsibility for safeguarding and promoting the welfare of children, young people and vulnerable adults, irrespective of individual roles. Everyone who comes into contact with young people, their families and carers, has a role to play in safeguarding them and promoting their welfare. In order to fulfil this responsibility effectively, all professionals should make sure their approach is student-centred. This means that they should consider, at all times, what is in the best interests of the student.

No single professional can have a full picture of a student's needs and circumstances. If young people and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt and restorative action. In line with this understanding, any adult working or volunteering at Fix It UK has a responsibility to recognise when a learner may be in need or be vulnerable in some way, and to respond to this recognition in a timely and appropriate way.

In order that organisations and practitioners collaborate effectively, it is vital that all partners who work with children and vulnerable adults, including local authorities, the police, the health service, the courts, professionals, the voluntary sector and individual members of local communities, are aware of, and appreciate, the role that each of them plays in this area.

Although all organisations that work with children, young people and vulnerable adults share a commitment to safeguard and promote their welfare, many organisations have specific roles and responsibilities to do so that are underpinned by a statutory duty or duties.

It is known that some individuals will actively seek employment or voluntary work with children in order to harm them. People who work with children, young people and vulnerable

adults, whether it is in a voluntary capacity or not, have a role to play in protecting them from harm, safeguarding their welfare as well as preventing their abuse.

This document is aimed at providing information and guidance for staff involved in working with children, young people and vulnerable adults.

Our students join us from a number of different local authorities. We are committed to working within the guidelines laid down by each of these different local safeguarding boards but for the purposes of this document and due to the greater proportion of our students being within the Wigan catchment area, we will make specific reference to the policies and practices of the Wigan Local Safeguarding Children's Board.

Throughout these policies and procedures, reference is made to "children and young people". This term is used to mean "those under the age of 18". The Centre recognises that some adults are also vulnerable, accordingly, the procedures may be applied (with appropriate adaptations) to the protection of vulnerable adults. A vulnerable adult is defined as "a person aged 18 years or over, who is in receipt of or may be in need of community care services by reason of 'mental or other disability, age or illness and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation."

If it is in the professional judgement of the Centre's DSLs that the Multi Agency Support Hub (MASH) requires information immediately, as the child has suffered significant harm or is at risk of immediate harm, one of the DSLs will call the Duty Team 24 hours service on 01942 828300 In an emergency or when a child or young person is at risk of immediate harm the Police will be called on 999.

When making online referrals the DSL will inform parents unless there is a concern that informing the parents may be a risk in terms of further harm. In child protection cases, parental consent is not required.

The Centre will refer any concerns that a vulnerable adult might be at risk of significant harm to the appropriate Adult Social Care Services.

Fix It UK has nominated Clare Todd as the Trustee with special responsibility for Child Protection and Safeguarding issues. Clare has undertaken appropriate training and has been checked under section 128.

The Head of Fix It UK and all staff working with children and young people receive annual training to ensure that they possess the most up to date knowledge related to safeguarding and child protection issues and responsibilities, as well as the Centre's procedures and policies, with refresher training from Keefe Associates taking place at least every 2 years (Level 2 Safeguarding training for all staff was delivered in August 2025).

Everyone working or volunteering at Fix It UK is trained to recognise signs of concern and in line with this policy, must report concerns following the Centre and local authority procedures. Staff and volunteers are updated on safeguarding issues frequently across the year by the DSL (Diane Stone) and Deputy DSL's (Natalie Gavin and Amy King) at staff meetings and INSET days. New staff and volunteers receive inductions from the Head of Centre

At Fix It UK we believe that the welfare of every learner is paramount, and we take safeguarding very seriously. Therefore, should staff have any concerns they feel are of a safeguarding nature, they are expected to report, record and take the necessary steps to ensure that the child is safe and protected and that key staff at Fix It UK are aware promptly of any such concerns. As part of our commitment to and compliance with safeguarding

legislation and guidance; we also refer to and provide staff access to:

- [Working Together to Safeguard Children 2018](#)
- [What to do if you are worried a child is being abused - GOV.UK](#)
- [Keeping children safe in education 2025.pdf](#)
- [Guidance for safer working practice for staff working in education settings.](#)
- [Wigan Local Authority Safeguarding Policies and Procedures](#)
- Fix It UK Ltd Anti Bullying Policy
- Fix It UK E-Safety Policy
- Fix It UK Professional Standards Policy
- Fix It UK Behaviour Policy
- Fix It UK Learner Agreement

### **Information sharing and confidentiality:**

We take data handling and information sharing seriously. Centre staff have received appropriate training in relation to information sharing and confidentiality. We have a trained Data Protection Officer (DPO) as required by the UK General Data Protection Regulations (UK GDPR) and the Data Protection Act 2018 (DPA) to ensure that our centre is compliant with confidentiality and information sharing requirements as demanded by the Data Protection, Privacy and Electronic Communications (Amendments etc.) (EU Exit) Regulations 2019. Our DPO is the Head of Centre.

Sharing information enables practitioners and agencies to identify and provide appropriate services that safeguard and promote the welfare of learners. We will only share information about young people and families when it is appropriate and lawful to do so. We seek to work in partnership and will when possible inform parents and carers of concerns. In some specific instances, this may not be possible for example, if sharing information would increase risk, or if it is against local or national guidance.

Where we share information in relation to safeguarding or a child protection matter we follow local and national guidance, we pay particular regard to Information sharing advice for practitioners in safeguarding services and Data Protection Toolkit for Schools.

### **B: The Staff Safeguarding Procedure within Fix It UK**

Fix It UK Ltd will promote the welfare and protection of children, young people and vulnerable adults within all services by:

- Respecting their rights, wishes, feelings and privacy.
- Preventing abuse by promoting best practice, creating a safe and healthy environment and avoiding situations where abuse and allegations of abuse occur.
- Taking seriously and responding appropriately and promptly to all concerns, incidents and allegations.
- Provide training appropriate to the level of involvement with children, young people and vulnerable adults to ensure that employees understand the different forms of abuse, as well as their roles and responsibilities under the Combined Safeguarding Policy.
- Not tolerating harassment of any employees, volunteers, contracted service providers or children/vulnerable adults who raise concerns of abuse.
- Ensuring that unsuitable people are prevented from working with children, young people and vulnerable adults through the Organisation's 'Safe Recruitment / DBS Policy.'
- In order to stay at the forefront of safeguarding, Fix It UK Ltd is committed to

reviewing its safeguarding policies and procedures regularly and where changes in Government policy and guidance occurs.

## **Promoting Good Practice**

The vast majority of adults who work with children, young people or vulnerable adults act professionally. Some individuals will actively seek employment or voluntary work with young people in order to harm them. All concerns regarding individuals' practice should be reported to the Area Manager.

## **Protecting Our Employees and Volunteers**

It is likely that staff will come into contact with children, young people and vulnerable adults during the course of their working day. To safeguard our employees, we will work with customers, clients and service users to ensure the following is in place:

- Adequate supervision is in place during classroom or external activities.
- Ensure all staff do not find themselves alone working with children, young people and vulnerable adults without adequate supervision.

## **What Do We Mean by Abuse?**

Abuse – is a violation of an individual's human and civil rights by any person or persons. Abuse may consist of a single act or repeated acts. It may be physical, verbal or psychological. It may be an act of neglect or an omission to act, or it may occur when a vulnerable person is persuaded to enter into a financial or sexual transaction to which he or she has not consented, or can not consent. Abuse can occur in any relationship and may result in significant harm to, or exploitation of, the person subjected to it. (No Secrets Department of Health 2000).

- 'Children and young people' – anyone under the age of 18 years.
- Child Sexual Exploitation – involves children and young people receiving something – for example accommodation, drugs, affection – as a result of them performing sexual activities, or having others perform sexual activities on them.
- Coercive behaviour is 'an act or pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish or frighten their victim.' This definition includes so called 'honour' based violence, female genital mutilation (FGM) and forced marriage (definitions below). Victims are not confined to one gender group or ethnic group.
- Child Criminal Exploitation occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18. The victim may have been criminally exploited even if the activity appears consensual.
- Controlling behaviour is 'a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour'.
- Domestic abuse is 'any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners of family members regardless of gender or sexuality'.
- Extra-familial abuse is linked to 'contextual safeguarding' or 'complex safeguarding'. These concepts refer to harm that occurs to children outside of their family system,

often during the adolescent years because at this age their social networks widen.

- Female Genital Mutilation (FGM) is 'a term used to describe procedures that include the partial or total removal of the external female genital organs, such as female circumcision, excision or infibulations'. This collective term also covers injury to the female genitalia for cultural or non-medical reasons.
- Forced Marriage is 'the act of physically, emotionally, psychologically or financially pressuring someone to marry against their will'. Forced marriages can occur in this country and abroad and differ significantly from arranged marriages, which are entered into freely by both people, despite their families taking a leading role in the choice of partner. Chapter 12 part 10 of the Anti-Social Behaviour, Crime and Policing Act 2014 made from the 16th June 2014. Parents who force their children to marry are liable to be punished by up to seven years in prison. The new law applies to UK nationals overseas who are at risk of becoming victims of a forced marriage.

Hate Crime is 'a term used to describe a criminal offence committed against a person motivated by hate or prejudice against their:

- Race, colour, ethnic origin and nationality.
- Religion and faith.
- Gender or gender identity.
- Sexual orientation.
- Disability and learning difficulties.
- Mental health'.

Honour Based Abuse (HBA) refers to crimes committed against a person as punishment for breaking an 'honour code', usually imposed by a family or community.

Human Trafficking – also known as 'Modern Slavery'. Human Trafficking involves the recruitment, transportation, transfer, harbouring or receipt of people who, with the threat or use of force, coercion, abduction, abuse of power or deception are exploited for the purposes of prostitution, forced labour, slavery or other similar practices. This can occur either from one country to another or even within the same country, county or town. There is no typical victim and some victims don't understand that they have been exploited and are entitled to help and support. Key indicators that someone may be a victim of trafficking might include:

- The person's passport, identification or travel documents are being held by someone else.
- The person appears to have been 'coached' or told what to say in certain circumstances and he or she allows others to speak on their behalf.
- The person must pay a facilitator back for travel costs through working or providing services.
- They are living in accommodation with multiple people where conditions are cramped and poor.
- They receive little or no payment for their work.
- The person does not appear to have freedom of movement.
- The person regularly appears withdrawn, timid or frightened.
- The person has been physically or emotionally harmed or deprived of food, water, sleep, medical care or other life necessities.
- A child or young person who is not in school or any other form of education or

training.

'Parents' this term is used in its broadest sense to include parents, carers and guardians. 'Prevent' this is drawn from the national counter-terrorism strategy known as 'contest' and consists of the following four strands:

- Prevent – to stop people becoming terrorists or supporting violent extremists.
- Pursue - to stop terrorist attacks.
- Protect – to strengthen our overall protection against terrorist attacks.
- Prepare – where we cannot stop an attack, to mitigate its impact.

Peer on peer abuse. This may include:

- Bullying (including cyber bullying and prejudice-based behaviours),
- Gender based violence/sexual assaults
- Taking, collecting and sharing of naked or semi-naked images and upskirting
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- initiating/hazing type violence and rituals

In order to prevent any instances of peer on peer abuse we induct all students in our centre mission and behaviour policies at induction to educate our learners in terms of what is acceptable behaviour and to promote a tolerant and inclusive centre environment.

Students are made aware of the 'disclosure' option at induction which allows them to share concerns discreetly with Tutors and DSLs.

Any form of peer on peer abuse is completely at odds with the centre mission and we are committed to ensuring that procedures are in place to minimise the risk of peer on peer abuse. The Centre's behaviour policy and learner agreement are shared with and discussed with all students during the induction process.

All allegations of peer on peer abuse will be recorded by the member of staff receiving the allegation on a Record of Concern, they will be investigated by the DSL's and dealt with in line with the Centre's behaviour policy

Where necessary perpetrators may be suspended while an investigation is concluded and potentially be withdrawn from the Centre.

### **Sharing of nude or semi-nude pictures (sometimes referred to as sexting)**

In the latest advice from the Schools and Colleges UK Council for Internet Safety (UKCIS), this is defined as the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline.

Where staff members or others working in our setting become aware of the sharing of any such imagery the following steps should be taken.

- Complete a record of concern immediately and refer this to the DSLs.
- Never view, copy, print or save the imagery yourself or ask a student to share or download (this is illegal).
- Do not delete the imagery or ask the student to delete it.
- Do not ask the student(s) involved in the incident to disclose

information regarding the imagery. This is the responsibility of the DSLs.

- Do not say or do anything to blame or shame any young people involved.
- Explain to the young people involved that it must be reported as a safeguarding concern and that they will receive support from the safeguarding team.
- Do not share information about the incident beyond the DSLs. They will take responsibility for how best to act on the concern.

Further advice can be found here:

[Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)

## **Contextual Safeguarding**

Safeguarding incidents and/or behaviours can be associated with factors outside the centre and/or can occur between children and young people outside the centre. All staff, but especially the designated safeguarding lead (or deputy) will consider the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of students should consider whether wider environmental factors are present in a student's life that are a threat to their safety and/or welfare. Children's social care assessments should consider such factors, and the centre will provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

## **Safeguarding vulnerable adults**

A vulnerable adult is defined as someone who is over 18 years of age and in receipt or need of community care services in order to maintain their independence. Adult students are able to disclose information about their circumstances at enrolment, induction and during their programme of study. All staff working with Adult learners receive safeguarding training as part of the Centre's staff development programme. Some team members also attend training on vulnerable adults where necessary.

## **Indicators of Abuse**

Signs of possible child abuse.

It is important to remember that lists such as the one below are neither completely definitive nor exhaustive. The information in such lists has to be used in the context of the child's whole situation and in combination with a range of other information related to the child and his/her circumstances.

There can be an overlap between all the different forms of child abuse and all or several can co exist.

## **Physical Abuse**

Signs of possible physical abuse.

- Unexplained injuries or burns, particularly if they are recurrent.
- Improbable excuses given to explain injuries.
- Refusal to discuss injuries.
- Untreated injuries, or delay in reporting them.

- Excessive physical punishment.
- Arms and legs kept covered in hot weather
- Fear of returning home.
- Aggression towards others.
- Running away

When considering the possibility of non-accidental injury it is important to remember that the injuries may have occurred for other reasons, e.g. genuine accidents or medical disorders.

### **Physical Neglect**

Signs of possible physical neglect.

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Poor state of clothing
- Frequent lateness and/or unexplained non-attendance at College
- Untreated medical problems
- Low self-esteem
- Poor peer relationships
- Stealing

### **Emotional Abuse**

Signs of possible emotional abuse.

- Low self-esteem
- Continual self-deprecation
- Sudden speech disorder
- Significant decline in concentration
- Social-emotional immaturity
- 'Neurotic' behaviour (eg rocking, head banging)
- Self-mutilation
- Compulsive stealing
- Extremes of passivity or aggression
- Running away
- Indiscriminate friendliness

### **Sexual Abuse**

Signs of the sexually abused child.

Not all children are able to tell parents that they have been assaulted. Changes in behaviour may be a signal that something has happened.

These are general indicators that a child may be troubled though not necessarily about a sexual assault. The child may have some of these problems or none at all. It is the combination, frequency and duration of signs that will alert you to a problem. Try to notice all changes in usual behaviour.

It is important to remember that in sexual assault there may well be no physical or behavioural signs.

### **Signs of possible sexual abuse**

## **Behavioural**

- Lack of trust in adults or over-familiarity with adults
- Fear of a particular individual
- Social isolation – withdrawal or introversion
- Sleep disturbance (nightmares, irrational fears)
- Running away from home
- Reluctance or refusal to participate in physical activity or to change clothes for physical activities
- Low self-esteem
- Drug, alcohol or solvent abuse
- Display of sexual knowledge beyond the child's years
- Unusual interest in the genitals of adults or children or animals
- Expressing affection in inappropriate ways.
- Fear of bathrooms, showers, closed doors
- Abnormal sexualised drawing
- Fear of medical examinations
- Developmental regression
- Poor peer relations
- Over-sexualised behaviour
- Compulsive masturbation
- Stealing
- Psychosomatic factors, e.g. recurrent abdominal pain or headache
- Sexual promiscuity

## **Physical/Medical**

- Sleeplessness, nightmares, fear of the dark
- Bruises, scratches, bite marks on top of the thighs or genital areas
- Itch, soreness, discharge, unexplained bleeding from the rectum or penis
- Pain on passing urine or recurrent urinary infection
- Stained underwear
- Unusual genital odour
- Anxiety/depression
- Eating disorder, e.g. anorexia nervosa or bulimia
- Discomfort/difficulty in walking or sitting
- Venereal disease, sexually transmitted diseases
- Soiling or wetting in children who have been trained
- Self- mutilation/suicide attempts

## **What Should You Do If A Child, Young Person or Vulnerable Adult Reports Abuse?**

If someone discloses that they are being abused, then upon receiving the information you should:

- React calmly.
- Reassure them they were right to tell, that they are not to blame and take what they say seriously.
- Be careful not to be deemed as putting words into their mouth, the easiest way of doing this is by asking questions.
- Do not promise confidentiality.
- Inform the child/ young person/vulnerable adult what you will do next.
- Make a record of the nature of the disclosure and report it immediately to the nominated protection officer in your setting (By completing the form at Annex A).

## **Reporting a Disclosure**

In the event of an incident or disclosure:

## **DO**

- Make sure the individual is safe.
- Report to the safeguarding representative on site who will decide whether emergency intervention is appropriate.
- Listen.
- Offer support and reassurance.
- Ascertain and establish the basic facts.
- Make careful notes and obtain agreement on them.
- Ensure notation of dates, time and persons present are correct and agreed.
- Take all necessary precautions to preserve forensic evidence.
- Follow the correct procedure.
- Explain areas of confidentiality; immediately speak to your manager for support and guidance.
- Explain the procedure to the individual making the allegation.
- Remember the need for ongoing support.

## **DON'T**

- Confront the alleged abuser.
- Promise confidentiality
- React emotionally
- Be judgmental or voice your own opinion.
- Be dismissive of the concern.
- Press for details or ask leading questions which may invalidate court proceedings
- Interrupt or stop a student during a disclosure
- Disturb or destroy possible forensic evidence.
- Consult with persons not directly involved with the situation.
- Assume Information.
- Make promises.
- Elaborate in your notes.
- Ignore the allegation.
- Panic
- Forget to make time and seek support for yourself.

It is important to remember that the person who first encounters a case of alleged abuse is not responsible for deciding whether abuse has occurred. This is a task for the Safeguarding Responsible Person at your site.

## **Confidentiality**

Where safeguarding issues arise with Child, Young person or Vulnerable Adults the need for confidentiality must be clearly understood by all.

- Managers, staff and volunteers have a professional responsibility to share relevant information about the protection of children, young people and vulnerable Adults with other professionals, particularly investigative agencies and adult social services.
- Clear boundaries of confidentiality will be communicated to all.

- All personal information regarding a child, young person or vulnerable adult will be kept confidential. All written records will be kept in a secure area for a specific time as identified in data protection guidelines. Records will only record details required in the initial contact form.
- If an adult confides in a member of staff and requests that the information is kept secret, it is important that the member of staff tells the adult sensitively that he or she has a responsibility to refer cases of alleged abuse to the appropriate person for safeguarding at the site.
- Within that context the adult must, however, be assured that the matter will be disclosed only to people who need to know about it.
- Where possible, consent must be obtained from the child's parents/appropriate adult, young person or vulnerable adult before sharing personal information with third parties. In some circumstances obtaining consent may be neither possible nor desirable as the safety and welfare of the individual is the priority.
- When a disclosure has been made, staff must let the adult know the position regarding their role and what action they will have to take as a result.

## Procedures and Record Keeping

All records will provide a factual, evidence-based account using the student's words. Timely, accurate recording of every episode / incident / concern / activity / actions will be made **including telephone calls to other professionals**. Records will be signed, dated and where appropriate, witnessed. Support and advice will be sought from Children's Social Care (via the MASH), Senior Advisor for Safeguarding in Education (SASE) or the Local Area Designated Officer (DO), whenever necessary.

There is always a DSL available who has the necessary seniority and skills, has undertaken appropriate safeguarding training, and is given the time to carry out this important role.

This safeguarding policy is updated annually or in line with any new DfE guidance (as required).

In the case of child protection referral, the DSL will contact MASH immediately (alongside any other emergency or support services that may be required).

In the case of poorly explained serious injuries / injuries causing concern or where behaviour or concerns arouse suspicion or if in any doubt, the DSL should contact the MASH for advice.

The DSL will keep written (electronically or by hand), signed, timed and dated records detailing any disclosures and action taken as near to the time of disclosure as possible even when no investigation is undertaken; should the MASH agree to initiate a referral verbally a Child Protection Referral Form will still be required within 24 hours.

Allegations are always shared directly with the Head of Centre. Where an allegation of abuse is made against any member of staff/ volunteer, deputy or designated safeguarding person, the Head of Centre will speak with the Designated Officer (DO) at the Safeguarding Children Unit to discuss the next steps.

If the allegation is against the Head of Centre, the Chair of Trustees should be contacted immediately, and he/she seeks advice from the DO. If the allegation is against both Head of Centre and Chair, then the DO should be contacted directly. No member of staff will conduct their own investigation or pass on information to the alleged perpetrator. Professionals can contact the DO directly if they feel it is more appropriate to do so.

Fix It UK has a whistleblowing procedure. It is part of a professional's duty to report safeguarding issues, without the expectation of anonymity. Safeguarding and whistleblowing should not be confused. "Safeguarding" refers to reporting concerns designed to protect children from harm and acting to enable all students to have the best outcomes. In contrast "whistleblowing" describes the disclosure of concerns regarding a danger or illegality that has a public interest, usually because it threatens others or impacts on public funds.

## **Reporting and Dealing with Allegations of Abuse against Members of Staff**

The procedures apply to all staff, whether teaching, administrative, management or support, as well as to volunteers. The word "staff" is used for ease of description.

### **Introduction**

In rare instances, staff from educational institutions have been found responsible for child abuse. Because of their frequent contact with children and young people, staff may have allegations of child abuse made against them. The Centre recognises that an allegation of child abuse made against a member of staff may be made for a variety of reasons and that the facts of the allegation may or may not be true. It is imperative that those dealing with an allegation maintain an open mind and those investigations are thorough and not subject to delay.

The Centre recognises that the Children Act 1989 states that the welfare of the child is the paramount concern. It is also recognised that hasty or ill-informed decisions in connection with a member of staff can irreparably damage an individual's reputation, confidence and career. Therefore, those dealing with such allegations within the Centre will do so with sensitivity and will act in a careful, measured way. We will take all possible steps to safeguard our young people and to ensure that the adults in our centre are safe to work with children. We will always ensure that the procedures outlined in Part 4 of Keeping Children Safe in Education: Statutory guidance for educational establishments and colleges, September 2024 are adhered to.

### **Reporting Low Level Concerns:**

A low-level concern means the allegations against that staff member do not meet the harms threshold and this person does not pose an immediate risk towards the students. The adult in question may have acted in a way that:

- is inconsistent with this code of conduct, including inappropriate conduct outside of work
- is otherwise not considered serious enough to consider a referral to the LADO.

Examples of low level concerns include:

- Being over friendly with students or having favourites
- Engaging with a child one to one in a secluded area
- Using inappropriate sexualised, intimidating, or offensive language

If you become aware of any breaches of this code or have a low level concern, you must report them to the Head of Centre in writing. If the concern is about the Deputy Head of Centre you must report it to the Head of Centre. If necessary, staff should follow our whistleblowing procedure.

## Receiving a serious allegation against a member of staff

A member of staff who receives a serious allegation about another member of staff should follow the guidelines for dealing with disclosure immediately.

- The allegation should be reported immediately to the Head of Centre, unless the Head of Centre is the person against whom the allegation is made, in which case the report should be made to the Chair of Trustees..
- The Head of Centre (or Chair of Trustees, if the allegation is against the Head of Centre) will obtain written details of the allegation from the person who received it, that are signed and dated. The written details should be countersigned and dated by the Head of Centre (or Chair of Trustees). Record information about times, dates, locations and names of potential witnesses. The Head of Centre or Chair of Trustees, will initially contact the Local Authority Designated Officer (LADO) to receive advice before undertaking further investigations.

Any member of staff or volunteer who does not feel confident to raise their concerns with the Head of Centre or Chair of Trustees should report their concerns directly to the LADO on 01942 486 034

The Centre together with Children's Social Care and the police, if they are involved, will consider the impact on the child or young person concerned and provide support as appropriate.

- The Head of Centre will ensure that the child and family are kept informed of the progress of the investigation.
- The Human Resources Team will be contacted at the earliest opportunity for advice in relation to the investigation of any allegation in line with the Centre's Disciplinary Policy, where appropriate.
- The staff member who is the subject of the allegation will be advised to contact their professional association, trade union or a colleague for support, (depending on the outcome of the safeguarding strategy meeting which is normally chaired by the LADO).
- The Human Resources Team will ensure that the staff member is provided with appropriate support, if necessary, through occupational health or welfare arrangements.
- The Head of Centre will appoint a named representative to keep the staff member updated on the progress of the investigation; this will continue during any police or section 47 investigation or disciplinary investigation.

Other potential outcomes are:

The allegation represents inappropriate behaviour or poor practice by the member of staff and is neither potentially a crime nor a cause of significant harm to the child. The matter should be addressed in accordance with the Centre's disciplinary procedures.

The allegation can be shown to be false because the facts alleged could not possibly be true.

## Enquiries and Investigations

Child protection enquiries by Social Services or the Police are not to be confused with internal, disciplinary enquiries by the Centre. The Centre may be able to use the outcome of external agency enquiries as part of its own procedures. The child protection agencies, including the Police, have no power to direct the Centre to act in a particular way; however, the Centre should assist the agencies with their enquiries.

The Centre will suspend its own internal enquiries while the formal police or social services investigations proceed; to do otherwise may prejudice the investigation. Any internal enquiries shall conform to the existing staff disciplinary procedures.

If there is an investigation by an external agency, for example the Police, the Head of Centre (or Chair of Trustees) should normally be involved in, and contribute to, the inter-agency strategy discussions. The Head of Centre (or Chair of Trustees) is responsible for ensuring that the Centre gives every assistance with the agency's enquiries. He/she will ensure that appropriate confidentiality is maintained in connection with the enquiries, in the interests of the member of staff about whom the allegation is made.

## **Suspension of Staff**

Suspension should not be automatic. In respect of staff other than the Head of Centre or Deputy Head of Centre, (i.e. Senior Post Holders), suspension can only be carried out by the Head of Centre (or Deputy in his/her absence). In respect of the Head of Centre, suspension can only be carried out by the Chair of Trustees (or in his/her absence, the Vice Chair).

Suspension may be considered at any stage of the investigation. It is a neutral, not a disciplinary act and shall be on full pay. Consideration should be given to alternatives: e.g. paid leave of absence; agreement to refrain from attending work; change of, or withdrawal from, specified duties.

Suspension should only occur for a good reason. For example:

- where a child is at risk.
- where the allegations are potentially sufficiently serious to justify dismissal on the grounds of gross misconduct.
- where necessary for the good and efficient conduct of the investigation.

If suspension is being considered, the member of staff should be encouraged to seek advice.

Prior to making the decision to suspend, the Head of Centre (or Chair of Trustees) should interview the member of staff. This should occur with the approval of the appropriate agency identified by the LADO. In particular, if the police are engaged in an investigation the officer in charge of the case should be consulted.

The member of staff should be informed that they have the right to be accompanied by a work colleague or properly affiliated trade union representative. The member of staff should be informed that an allegation has been made and that consideration is being given to suspension. It should be made clear that the interview is not a formal disciplinary hearing, but solely for raising a serious matter which may lead to suspension and further investigation.

During the interview, the member of staff should be given as much information as possible, in particular the reasons for any proposed suspension, provided that doing so would not interfere with the investigation into the allegation. The interview is not intended to establish the member of staff's innocence or guilt, but to give the opportunity for the member of staff to make representations about possible suspension. The member of staff should be given the opportunity to consider any information given to him/her at the meeting and prepare a response, although that adjournment may be brief.

If the Head of Centre (or Chair of Trustees) considers that suspension is necessary, the member of staff shall be informed that he/she is suspended from duty. Written confirmation of the suspension, with reasons, shall be despatched as soon as possible and ideally within one

working day.

Where a member of staff is suspended, the Head of Centre (or Chair of Trustees if it is the Head of Centre) should:

- Be informed of the suspension in writing.
- Receive a report that a member of staff has been suspended pending investigation, the detail given to should be minimal.
- Where the Head of Centre has been suspended, the Chair or Vice Chair of Governors will need to take action to address the management of the College.
- The parents/carers of the child making the allegation should be informed of the suspension. They should be asked to treat the information as confidential. Consideration should be given to informing the child making the allegation of the suspension.
- Senior staff who need to know of the reason for the suspension should be informed.

Depending on the nature of the allegation, the Head of Centre should consider, with the Chair of Trustees, whether a statement to the learners of the Centre and/or parents/carers should be made, taking due regard of the need to avoid unwelcome publicity

The Head of Centre should consider carefully and review the decisions as to who is informed of the suspension and investigation. The Wigan Family LADO or equivalent officer at the appropriate Local Authority and external investigating authorities should be consulted.

The suspended member of staff should be given appropriate support during the period of suspension. He/she should also be provided with information on progress and developments in the case at regular intervals.

The suspension should remain under review in accordance with the Centre disciplinary procedures.

Where the member of staff has been suspended and no disciplinary action is to be taken, the suspension should be lifted immediately, and arrangements made for the member of staff to return to work. It may be appropriate to offer counselling.

The child or children making the allegation and/or their parents should be informed of the outcome of the investigation and proceedings. This should occur prior to the return to the centre of the member of staff (if suspended).

The Head(or Chair of Trustees) should give consideration to what information should be made available to the general population of the College.

### **Allegations without foundation**

Obviously false allegations may be indicative of problems of abuse elsewhere. A record should be kept, and consideration given to a referral to the Safeguarding team in order that other agencies may act upon the information.

In consultation with the DSL and/or the Chair of Trustees, the Head of Centre shall:

- Inform the member of staff against whom the allegation is made orally and in writing that no further disciplinary or child protection action will be taken. Consideration should be given to offering counselling and support in order to rebuild the member of staff's confidence.
- Inform the parents/carers of the alleged victim that the allegation has been made and of the outcome.

- Where the allegation was made by a child other than the alleged victim, consideration should be given to informing the parents/carers of that child.
- Prepare a report outlining the allegation and giving reasons for the conclusion that it had no foundation and confirming that the above action had been taken.

In some circumstances, consideration should be given to broader disclosure of details of the outcome of the investigations, for example if the matter is of general importance, has become common knowledge or the subject of general gossip. There is a need to provide accurate details for public information.

## **Records**

It is important that documents relating to an investigation are retained in a secure place, together with a written record of the outcome and, if disciplinary action is taken, details retained on the member of staff's personal and confidential file. Where the allegation is found to be without foundation, a record of the allegation, investigation and outcome should be retained.

If a member of staff is dismissed or resigns before the disciplinary process is completed, he/she should be informed about the College's statutory duty to inform the Secretary of State for Education under the Children and Adults Barred List procedure.

## **Monitoring Effectiveness**

Where an allegation has been made against a member of staff, the designated Trustee, together with the senior staff member with lead responsibility should, at the conclusion of the investigation and any disciplinary procedures, consider whether there are any matters arising from it that could lead to the improvement of the Centre's procedures and/or policies. Any such improvements should then be incorporated into the Charity's policies / procedures. Consideration should also be given to the training needs of staff.

## **Safer Recruitment and DBS Policy**

Fix It UK Ltd and its associated companies are committed to safeguarding and promoting the welfare of children, young people, and vulnerable adults and expects all staff and volunteers to share this commitment. The suitability of all prospective employees or volunteers will be assessed during the recruitment process in line with this commitment.

All staff must be DBS checked in order to ensure that they are able to work with children, young people or vulnerable adults. Appointments will be made subject to clearance through DBS. Any issues arising from the DBS will be checked with the individual and where appropriate referred to the client. Identity and Eligibility to Work in the UK checks are carried out prior to employment. DBS and eligibility to work checks are carried out in accordance with company procedures.

All staff will be made aware of the Combined Safeguarding Policy at induction and informed about procedures for raising concerns.

## **Photography**

It is an offence under the Data Protection Act 2018 to photograph children and/or young people without their express consent or that of their parent or guardian. Any such incidents are to be reported to the nominated officer for safeguarding without delay.

## Referral

In the unlikely event that a referral is required this should be made to the Children's Social Care Team of the Local Authority. Referrals should be made by the nominated person for Safeguarding / Child Protection.

## Emergency Action

In some cases, you may need to protect a child/young person or vulnerable adults' immediately - in these situations dial 999.

The Police are the only agency with statutory powers for the immediate protection of children, young people and vulnerable adults.

**It is not the organisation's responsibility to decide whether abuse has taken place or not, however, it will pass on information to the appropriate authority immediately.**

## Training

Training will be provided to employees and volunteers to ensure safeguarding is given the highest priority, when provided services to our clients, customers and service users.

## Policy Development and Review

This policy will be reviewed each year by the Board of Trustees. The views of clients will be considered in these reviews.

## Related Documents

This policy is produced in conjunction with the following:

- Fix It UK Ltd Safer Recruitment and DBS Policy.
- Safeguarding training record (Annex B).

## Legal Framework

This policy has been formulated on the basis of the applicable law and guidance listed below:

- [Children Act 1989.](#)
- [United Convention of the Rights of the Child 1991.](#)
- [Data Protection Act 2018.](#)
- [Sexual Offences Act 2003.](#)
- [Children Act 2004.](#)
- [Protection of Freedoms Act 2012](#)
- ['Working Together to Safeguard Children' DfE 2018.](#)
- [Human Rights Act 1998.](#)
- [Public Interest Disclosure Act 1998.](#)
- [Safeguarding Vulnerable Groups Act 2006.](#)
- [Deprivation of Liberty Safeguards, Code of Practice 2008.](#)
- [The Children and Families Act 2014.](#)
- [Keeping children safe in education 2025.pdf](#)

## Annex A to Safeguarding Policy

*Initial cause for concern form, which will be discussed with Line Manager/Person responsible for safeguarding at Fix it UK within 24 – 48 hours. If out of hours, call your Line Manager for advice.*

Date

Time

Name of individual cause for concern is about

Age (if known)

Address (if known)

Describe your concern and action taken

Observations to support cause for concern

Description and location of any visible marks, bruising etc.

Name of alleged abuser, relationship with child (if known)

Name of person completing form:

Signature:

Date:

Name:

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Name of Line Manager:

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Signature:

Date:

Name: \_\_\_\_\_

