

SAFEGUARDING POLICY AND PROCEDURES

1. Introduction

- 1.1 This Policy is in place for Community Links Training & Enterprise. For any policy to be effective it must be applied throughout Community Links Training & Enterprise, these policies therefore apply to all Directors, employees and contractors regardless of position or seniority.
- 1.2 The purpose of this document is to ensure policies designed to direct the behaviour of individuals in a manner that protects everyone's right to live free from abuse.
- 1.3 The Designated Safeguarding Lead will monitor the effectiveness of the Policy, which may be changed from time to time to ensure it provides protection, guidance, legislative compliance, and promotes confidence, integrated working, and a caring, accessible, and safe environment.
- 1.4 This policy is our commitment to ensuring all those with whom and we work are protected from harm or abuse and that any experiencing difficulties are provided with appropriate support. We believe all children, young people and adults have the right to equal protection from all types of harm or abuse and deserve the opportunity to:
 - Gain the maximum benefit possible from good quality education and training
 - Be in a safe environment and protected from harm
 - Experience emotional well-being
 - Be supported by a network of reliable professionals
 - Be competent in looking after themselves and coping with everyday living
 - Be physically and mentally healthy as possible
 - Be protected from online abuse, grooming and radicalisation
- 1.5 Community Links Training & Enterprise will ensure all those with whom we work and our staff know how to protect themselves and develop resilience around the risks associated with physical, emotional, and sexual abuse and harassment, radicalisation, extremism, forms of abuse, grooming and bullying – including through the use of the internet.
- 1.6 **Related Policies**
 - Prevent Policy
 - Whistleblowing Policy

2. Definitions

Term	Definition
DSL	Designated Safeguarding Lead
LADO	Local Authority Designated Officer
SPoC	Single Point of Contact
Safeguarding	Protecting an individual's right to live free from harm, abuse and neglect.
Prevent	Part of CONTEST, the UK Governments Counter-terrorism Strategy, safeguarding individuals from being radicalised
Radicalisation	The process through which individuals are drawn into extremist views and actions

3. Roles and Responsibilities

Role	Responsibilities
Directors	- Overall responsibility for meeting our legal requirements. - Agree the Safeguarding Policy, ensure provision of sufficient resources to comply with this policy, have oversight and scrutiny of safeguarding activities
Designated Safeguarding Lead (DSL)	- Steve Woods is the DSL. He will offer advice and guidance to colleagues, monitor and report safeguarding activity, arrange training and cascade good practice. - Reporting any allegations of abuse against staff to the LADO - Sharing safeguarding related information Contact: 01744 733711 steve.woods@mycommunitylinks.com
All Staff	- Understand and follow Community Links Training & Enterprise's safeguarding processes and policies - Undertake safeguarding training on a regular basis including initial training and refresher courses. - Understand and demonstrate appropriate professional boundaries. - Support others to ensure they know how to protect themselves from the risks of all forms of abuse - Understand and comply with the duties placed upon Community Links Training & Enterprise and/or our clients by Government strategies including the Prevent Strategy (Counter Terrorism and Security Act 2015) - Contribute as necessary to Community Links Training & Enterprise's safeguarding processes to ensure a process of review and continuous improvement is followed.
Subcontractors, volunteers, and consultants	- Respond, refer, record, and review any concerns about abuse appropriately in line with procedures - Appreciate that anyone could be subject to abuse or become vulnerable at any time in their lives, irrespective of age, personal circumstances social background - Respond and report any allegation against employees. - Record incidents accurately and immediately in accordance with our processes, ensuring use an individual's own words, do not make assumptions and record factual information.

	• Share sensitive information in a timely and secure way, with the Designated Safeguarding Lead • Undertake safeguarding training on a regular basis including initial training and refresher courses. • Understand and follow Community Links Training & Enterprise processes and policies • Understand and comply with the duties placed upon Community Links Training & Enterprise and our clients by Government strategies including the Prevent Strategy (Counter Terrorism and Security Act 2015)
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4. Policy Statement

4.1 Our safeguarding policy and procedures are based on five principles:

- It is everyone's right to live free from abuse.
- Priority is given to the prevention of abuse by raising awareness of safeguarding and by fostering a culture of vigilance around safeguarding issues.
- Identification of concern that anyone who is suspected of, or subjected to abuse, or mistreatment, will be addressed immediately.
- Safeguarding is a multi-agency responsibility, and we expect all partners to actively work together to provide safe places, people, and services.
- Community Links Training & Enterprise will ensure that all suspicions, allegations, and incidents are taken seriously, responded to quickly and appropriately.

4.2 **Sexual harassment:** Community Links Training & Enterprise is committed to ensuring that incidents of sexual violence and sexual harassment of any kind are quickly identified and addressed. All staff and contractors must be vigilant to ensure peer on peer, and child-on-child abuse, incidents and risks, including sexism, misogyny, and misandry, are prevented and challenged, and a safe, healthy, inclusive environment in which to learn and work is maintained.

5. Relevant Legislation and Guidance:

5.1 Our policy and procedures are rooted in the following:

- Working together to safeguard children 2018 (updated 2020)
- Keeping Children Safe in Education (KCSiE) 2025
- Children Act 1989
- Children Act 2004
- The Data Protection Act 2018
- Data Protection, Privacy and Electronic Communications (Amendments) (EU Exit) Regulations 2020
- UK GDPR 2018
- Freedom of Information Act 2000
- Protection of Children Act 1999
- Child Criminal Exploitation (CCE)
- Human Rights Act 1998
- Education Act 2002
- United Nations Convention for the Right of the Child
- Children (Leaving Care) Act 2000
- Mental Capacity Act 2005 (MCA)
- No secrets 2000

- Care Act 2014
- Vulnerable Groups Act 2006
- Counter Terrorism and Security Act 2015
- Equality Act 2010
- Terrorism Act 2000, 2006, 2008
- Public Order Act 1986
- Protection from Harassment Act 1997
- Crime and Disorder Act 1998
- Racial and Religious Hatred Act 2006
- Consumer Rights Act 1998

6. Professional Boundaries

- 6.1 Representatives of Community Links Training & Enterprise will demonstrate appropriate professional boundaries when dealing with safeguarding concerns. Where appropriate we will work with suitable professionals to support others to access help. This can include local authority services where required. Formal external referrals are normally completed by the Designated Safeguarding Lead.
- 6.2 All Community Links Training & Enterprise representatives should at all times remain professional and remember they represent Community Links Training & Enterprise as a compassionate and professional service provider.
- 6.3 Our representatives should never contact clients on social media, except where LinkedIn or the company's Facebook account is appropriate in a professional capacity. All correspondence should be professional and go through professional channels only.

7. Recognising types of abuse and its context

7.1 Abuse may be:

- **Physical** – The abused may have obvious signs such as bruising, bite marks or burns. Other signs to look for are the abused becoming withdrawn, anxious, depressed, and clingy. There will often be a change in their behaviour, and they may start missing learning, appointments, or work.
- **Sexual** – The abused may start to avoid certain people or situations. They may become withdrawn and depressed, or in some cases will become sexually active at a young age, promiscuous or use sexual language that is not age appropriate. LGBTQ+ children, young people and adults are often targeted with sexual abuse; sexuality is not a sign of abuse but rather a characteristic to be protected from abuse
- **Sexual violence and sexual harassment** – any form of unwanted verbal, physical, cyber attention that results in a person feeling humiliated, undermined, or embarrassed due to unwarranted sexual comments and actions. This includes touching, remarks, jokes, pictures, staring or any other actions from any other person, including other learners, service users, staff, visitors, contractors, employers, and partners. Abusees may become withdrawn or aggressive, may change their dress (for example with clothes that cover up excessively) and this form of abuse can be prevalent through peer-on-peer abuse.
- **Psychological** – The abused may report that they are being yelled at, mocked, insulted, threatened, ignored and in some cases feeling increasingly isolated. The

abused will often have a strong feeling of worthlessness and become self-conscious, withdrawn, and depressed.

- **Neglect or act of omission** – The abused will often show signs such as malnutrition, begging, stealing or hoarding food. They may have poor hygiene, matted hair, dirty skin, or body odour. There may be unattended physical or medical problems. They may appear constantly tired, have frequent lateness or absence from learning or work. In some adults, neglect can be self-inflicted, such as self-harm, substance misuse, excessive exercise, eating disorders or hoarding.
- **Domestic** – The abused may have obvious signs such as regular bruising, scratches, bite marks or fractures. They may report that their partner will not let them see family or friends, that they feel controlled, are being told how they can or cannot dress. The abused will also frequently report that their partner belittles or humiliates them, is keeping them short of money or is using the children within the relationship in a threatening or controlling way. The abuse may be a single incident or a pattern of incidents which can be comprised of other forms of abuse such as psychological, physical, sexual, financial, or emotional. There is a high potential for short-term and long-term impact on the health of children who witness and/or experience domestic abuse at home or within their own intimate relationships, such as teenage relationship abuse; Domestic Abuse can occur in any intimate relationship.
- **Gaslighting** – Is when any person makes another person question themselves to the extent that they lose self-confidence, self-esteem, and struggle to maintain a sense of identity and reality. This is frequently linked to domestic abuse and within family relationships.
- **Financial** – the abused will often complain of having no money and will regularly look to borrow money. It may become obvious that they are missing personal possessions and it may appear that they are not living in conditions that reflect their financial resources. Other signs to look for would be the abusee's personal hygiene, weight loss, becoming suspicious of people's motives, withdrawn, anxious or depressed.
- **Institutional** – Institutional abuse is where an organisation's entire culture undermines individual liberty and personal value that results in the systematic abuse and wrong-doing of others.
- **Self-harm** – Self-harm is an act carried out by an individual to themselves. This may be evident in a wide range of ways for example cutting, burning, scratching, substance misuse, lack of personal hygiene, poor health, poor diet and sleep and poor lifestyle choices. Identifying self-harm can be extremely difficult as often there isn't obvious signs and scars. Cues and clues can include changes in behaviour, becoming withdrawn and rapid weight loss or gain, inappropriate clothing (For example long sleeves on a very hot day).
- **Modern Slavery** – Abusees of modern slavery may show signs of anxiety around time and location as if lacking freedom of movement, act as if instructed by someone else, allow others to speak for them, someone else controls their money, give the impression they have a debt, limited social interactions outside of their immediate environment, not being in possession of their own travel or identify documents. They may also present as dishevelled, tired and undernourished, which may result in poor attendance and timekeeping.

- **Cuckooing** – This is when gangs take over a vulnerable person's home to create a base from which to practice criminal activity. This can include dealing drugs, coordinating gang activity, selling weapons, moving/storing stolen goods, modern slavery and prostitution. Those being abused may become secretive and anxious around where they live and sharing personal information.
- **Radicalisation** – Abusees may show signs of being more intolerant of moderate views, increasingly extreme regarding another section of society or government policy, may express a desire or intent to take part in extremist activity, may be observed downloading viewing or sharing extremist propaganda, become withdrawn and focused on one ideology, their appearance may change (eg clothes, tattoos and emblems), may become secretive and may become isolated from friends and family.

Concerns that an individual may be vulnerable to radicalisation does not mean that you think the person is a terrorist; it means that you are concerned that they are prone to being exploited by others. The Prevent referral programme 'CHANNEL' has been set up by the Government and incorporates a multi-agency approach to support individuals at risk of radicalisation, namely pre-criminal activity, by:

- Identifying individuals at risk
- Assessing the nature and extent of that risk
- Developing the most appropriate support plan for the individual(s) concerned.

Community Links Training & Enterprise representatives have an obligation to refer to the DSL if they identify an individual that they believe may be vulnerable to being drawn into terrorism. Or if they believe they may be accessing extremist content, displaying changes in behaviour, or be suspected of being groomed or radicalised in centre, online or at home.

- **Child Sexual Exploitation (CSE)** – All staff are expected to understand how some young people and children can be groomed, coerced, and exploited by adults and other young people and some adults may be troubled by historic CSE. Any concerns should be reported through the safeguarding reporting system.
- **Missing Persons** – This can be an indicator of abuse or radicalisation. All non-attendance must be followed up. If there remains a concern for a person through absence and non-contact based on known vulnerabilities, this should be recorded as a safeguarding concern to escalate the situation.
- **Care leavers** may need additional support to achieve and may be more vulnerable to some forms of abuse, therefore staff must be vigilant to ensure care leavers are protected against abuse. Staff suspecting any concerns or identifying changes in behaviour should immediately report to the safeguarding team.
- **Female Genital Mutilation (FGM)** – FGM is illegal in the UK and is reportable regardless of where a concern may have taken place. It constitutes a form of child abuse and violence against children and young women that has severe short-term and long-term physical and psychological consequences. Signs and symptoms include extended family holidays where a British National is being taken abroad for this procedure, often accompanied by great excitement, like a coming of age. If staff have reason to believe a person may be at risk of FGM they have a legal responsibility to report this as a safeguarding concern so the DSL can liaise with Police and/or social services.

- **Trafficking and Modern Slavery** is a crime and violation of fundamental human rights. It takes various forms, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. Entire families can be trafficked and can often appear to be living normal lives. The National Crime Agency sets out the full National Referral Mechanism (NRM) for identifying, protecting and supporting victims of human trafficking. Mainstream is fully committed to preventing slavery and human trafficking and to ensuring transparency in our own business and approach with our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. We identify and assess potential risk areas when considering taking on new suppliers and regularly review our existing supply chains. We:
 - Understand all potential modern slavery risks related to business and to ensure steps are maintained to prevent slavery and human trafficking
 - Ensure our supply chains and suppliers adhere to our values
 - Establish and build relationships with all our suppliers upon mutually beneficial factors, with close and personal links and contact with the owners or directors, typically reflecting the fact that we partner with small and medium sized operations.
 - Pre-qualify any new contractors or suppliers through due diligence, relating to company performance, HS&E compliance, and references from other customers to establish that they are suitable.
 - All staff are made aware via induction and regular updates of safeguarding training issues related to trafficking and modern slavery. If staff members believe that anyone is at risk of trafficking, they have a legal responsibility to report this to the police or to social services. Any concerns also need to be reported to the safeguarding team.
- **Gangs and County Lines (Criminal Exploitation)** – Adults, young people, and children becoming involved in gangs are vulnerable to a range of risk taking, grooming and illegal activities including involvement in drug dealing, organised/gang crime, substance misuse, Child Sexual Exploitation, extremist activity and other forms of abuse and criminal activity. Concerns about organised gangs and criminal exploitation should be reported through safeguarding procedures.
- **Online safety** reflects a wide range of issues associated with technology and user access to content, contact with others and behavioural issues. Indicators of possible abuse may be an individual becoming withdrawn, changes in behaviour, being secretive and non-attendance, sudden concerns about debt and other symptoms identified in radicalisation (above). Everyone at Community Links Training & Enterprise has a responsibility to support others to be aware of how to keep themselves safe online.
- **Cyber-bullying/online** – Abusees of cyber-bullying may show signs such as becoming withdrawn or shy, or signs of depression. They may become secretive, extremely moody or agitated, anxious or very stressed, or potentially demonstrating aggressive behaviour. They may suddenly stop using their computer or stop wanting to take part in social activities.
- **Private Fostering** is when a child under the age of 16 (or 18 plus with a disability) lives with someone, who is not considered a close relative of the person, for 28 days or more in a year. Examples of this include living with a grandparent, aunt/uncle, sibling or stepparent. It is the law that any Local Authority is made aware of all the children who are being privately fostered as the local authority has a duty to ensure

that the child is safe and that the private foster carer has adequate support. If a member of staff or representative is concerned or unsure about private fostering, they must consult with the DSL.

8. Professional Curiosity

8.1 **Be aware:** Concern might arise because:

- You may see or hear something
- You may notice injuries that make you feel worried
- You may notice a change in behaviour
- The person may tell you

8.2 **Always remember** that abuse can and does happen:

- By adults to children and young people
- Amongst adults
- Peer to peer by children and young people
- By young people to adults
- To people with learning difficulties or disabilities
- To people who are disenchanted

9. Safeguarding Procedures

Responding to a Concern

9.1 If a learner, colleague or member of the public discloses concern about abuse or if you have a concern or suspicion then:

DO:

- Listen very carefully to what you are told
- Take what is said seriously and accept what you are told
- Stay calm and reassure the person has done the right thing in talking to you
- Write down as soon as you can, exactly what you have been told
- Tell the person you must pass on the information but that only those that need to know will be told. Tell the person to whom you will report the matter.
- Remember your professional boundaries.

DO NOT:

- Panic.
- Promise to keep things secret. You have a duty to report and refer.
- Say that everything will be fine now that they have told you.
- Criticise the abuser.
- Ask lots of detailed or leading questions such as: 'What did he do next?' Instead, ask open questions such as: 'Anything else to tell me?', 'Yes', or 'And...?'. Do not press for answers the person is unwilling to give, those suffering abuse are not always ready or able to talk about their experiences of abuse and/or may not always recognise that they are being abused.
- Offer to resolve any issues yourself, but report, seek advice and refer to appropriate professionals.

Reporting a concern

- 9.2 All staff and representatives have a duty to report any actual or suspected safeguarding concerns and to follow the procedure. Some service contracts delivered by Community Links Training & Enterprise may have specific additional reporting requirements regarding safeguarding or incidents to the Client. All staff or representatives should be made aware of these processes where additional to Community Links Training & Enterprise's procedure.

- **Step 1.** In the event of a concern, speak to the DSL. If the individual involved is in immediate danger, then contact the Emergency Services immediately
- **Step 2.** The DSL will provide advice and guidance and agree a course of action.
- **Step 3.** The person holding the concern or the DSL must record the concern, the advice given and the action taken using the Safeguarding Reporting Form

It is very important to record, as accurately as possible, what was said to you when you received the disclosure of abuse. All written records should be handled confidentially and only shared on a need-to-know basis. Records should include name, time, place, any witnesses, and state the facts, avoiding assumption and opinion.

- **Step 4.** The DSL will support the person holding the concern to carry out the agreed actions. If more concerns arise, Steps 2 and 3 shall be repeated.
- **Step 5.** Once there is no further action to be taken by Community Links Training & Enterprise, at the judgement of the DSL, the concern will be closed and the log will be updated to reflect this.

Obtaining Consent

- 9.3 Where possible it is important to try to obtain consent, but in some cases this may not be possible. Our policy ensures that information sharing should be necessary, proportionate, relevant, adequate, accurate, timely and secure. Confidentiality can never be promised.

- Confidential information is sensitive, not already in public domain and shared in confidence. Confidential information must be shared when required, strictly on a need-to-know basis, for safeguarding concerns.
- Confidential information can be shared – even if it has not been authorised by the person, where there is a risk of abuse, radicalisation, or significant harm.
- All staff or representatives must make sure any person accessing Community Links Training & Enterprise services is aware of the need to share confidential information where necessary and appropriate.
- If appropriate, and with consent for over 18s, the DSL may talk to parents or other family members when required.
- If you are unsure whether consent to share is needed, you must seek advice from the DSL.

Consent and Mental Capacity

- 9.4 All adults have the right to determine what happens to their own bodies and (if they are able to give it) valid consent must be obtained from them as outlined in the Mental Capacity Act 2005. The Mental Capacity Act is underpinned by the following principles:

- A presumption of capacity – every adult has the right to make his or her own decisions and must be assumed to have capacity unless it is proved otherwise
- Individuals have the right to make their own decisions – adults must be given all appropriate help before anyone can conclude that they cannot make their own decisions
- Individuals have the right to make eccentric or unwise decisions – this does not mean they lack capacity
- Best interests – anything done for or on behalf of people lacking capacity must be done in their best interest

9.5 The mental capacity act refers to the capacity to understand and retain information in relation to a specific act, decision, or transaction, to weigh up their consequences and to communicate the decision, at the time the decision needs to be made.

9.6 If Community Links Training & Enterprise has a safeguarding concern with an adult, it is important we respect the right of the adult to make decisions with regard to their own safety. They should therefore be encouraged to make decisions that they are able to make. Difficulties may arise when it is not clear whether a vulnerable adult is capable of making a decision or whether the decision is being made under duress. In law, an adult has the right to make their own decisions and it is to be assumed that they have the capacity to do so, unless it is proved that they do not.

9.7 To help determine if a person lacks capacity to make particular decisions, the Mental Capacity Act 2005 sets out two-stage test of capacity. Staff are required to be guided by the stage test to determine capacity.

- **Stage 1** – Does the person have an impairment of, or a disturbance in the functioning of their mind? Examples of impairment are:
 - Conditions associated with some forms of mental illness
 - Significant learning disabilities
 - The long-term effects of brain damage
 - Physical or medical conditions that cause confusion
 - Symptoms of alcohol or drug abuse
 - Dementia

The impairment does not have to be permanent

- **Stage 2** – For a person to lack capacity to make a decision, the Mental Capacity Act 2005 says their impairment or disturbance must affect ability to make specific decisions when they need to. A key principle is that people must first be given all practical and appropriate support to help them make the decision for themselves. Stage 2 can only apply if all practical and appropriate support to help the person make the decision has failed. A person is only deemed unable to make a decision if they cannot:
 - Understand information about the decision to be made
 - Retain the information
 - Use the information as part of a decision-making process
 - To communicate this decision, whether by talking, using sign language or any other means

If a staff member/volunteer is unsure whether the vulnerable person has capacity to make a decision, you will need to contact the DSL.

10. Allegations about Staff or Community Links Training & Enterprise

Allegations against staff or Representatives

- 10.1 Any safeguarding allegations about a member of staff or representative must be reported immediately to the DSL. This can be done in confidence. On receiving an allegation, the LADO will be informed and their advice taken.
- 10.2 The individual who is the subject of the concern may be subject to a disciplinary investigation and may be suspended during this process. Suspension during an investigation is intended as a neutral act to protect the staff member, the other party and the organisation. Suspension in this circumstance is not an implication of guilt. It is possible that a Community Links Training & Enterprise investigation will not happen until any investigation by statutory authorities is completed or until those authorities confirm a Community Links Training & Enterprise investigation may proceed.
- 10.3 If after an investigation the member of staff or representative returns to work, they will be supported to return and to re-integrate with colleagues and clients
- 10.4 If the allegation is against the DSL, a Director should be informed directly or direct to an external organisation.

Allegations about the Organisation

- 10.5 If the allegations are more systemic about the organisation, the same process in paragraph 10.1 should be followed. Alternatively, the person making the allegation may wish to use the Whistleblowing Policy.

Version history	Content Changed
1 – Sep 2024	Policy produced
2 - 23/10/2025	KSCIE 2025 reference updated Additional categories of abuse added Paragraph numbering added
3 – 23/10/26	Policy reviewed and agreed

Version Control

Review and Ratification

Next Review Date	Reason for Review
Sep 2027	Full Review following release of KCSIE 2026

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