

# Safeguarding Policy

## 1. Introduction

**Edu-Action Bristol Ltd** as an Alternative Learning Provider recognises our moral and statutory duty. We believe that children and young people should never experience abuse of any kind. We abide by the duty of care to safeguard and promote the welfare of children and young people and committed to safeguarding practice that reflects statutory responsibilities, government guidance and complies with best practice requirements.

The term Children "means" those under the age of 18. Edu-Action recognises that some young adults are also vulnerable to abuse. Accordingly, the procedures may be applied (with appropriate adaptations) to allegations of abuse and the protection of adults at risk. Where there are ongoing safeguarding issues for a young person, and it is anticipated that on reaching 18 years of age they are likely to be part of an EHC plan to ensure kids in care and SEN are supported until the age of 25. All Students aged 18-25yrs will have an individual educational care plan in place.

It's important that students of all ages feel safe in the surrounding environment and know where to go or who they can speak to if they feel at risk of harm or requires help.

This policy is to ensure appropriate and proportional protection is always in place. It applies to anyone working on behalf of **Edu-Action Bristol Ltd** including paid staff and volunteers where appropriate.

### Clarified Expectations for Alternative Provision (AP)

KCSIE 2025 clarifies safeguarding responsibilities when a child is placed in AP. Schools must:

- Obtain written confirmation that safeguarding checks have been completed on AP staff
- Be informed of any staff changes that could affect pupil safety
- Keep accurate records of the child's location (address and any satellite sites) please see referral
- Review placements regularly to ensure the child is attending and the environment is safe

## 2. Legal Framework

This policy has been drawn up based on legislation, policy and guidance that seeks to protect children, young people, and adults at risk in England.

- Education Act 2020 s175.
- Working Together to Safeguard Children 2022
- DfES statutory guidance Keeping Children Safe in Education 2025
- Ofsted guidance and procedure
- Equality Act 2010
- Children and Families Act 2014 and the Care Act 2014
- Mental Capacity Act 2005
- Children Act 2004
- KCSIE 2025

A summary of the key legislation and guidance is available from [www.nspcc.org.uk/childprotection](http://www.nspcc.org.uk/childprotection)

## 3. Supporting documents

This policy statement should be read alongside our organisational policies, procedures, guidance and other related

documents, which are included in the appendices to this policy.

- **Recognising the signs and symptoms of abuse (Appendix 1)**
- **Procedure for dealing with concerns, incidents and disclosures about a child, young person or adult at risk (Appendix 2)**
- **Role description for the designated safeguarding lead (Appendix 3)**
- **Code of conduct for staff and volunteers (Appendix 4)**
- **Safer recruitment of workers (Appendix 5)**
- **Student concerns, reporting process (Appendix 6)**
- **Definition of Low level concerns (Appendix 7)**
- **Role of LADO (Appendix 8)**
- **Health and Safety policy & policy Statement.**
- **Other related policies**
- **Activity risk assessments**
- **KCSIE updates**

#### **4. We will:**

- Protect children and young people who receive our services from harm. This includes children or adults who use our services.
- Provide staff and volunteers as well as children and young people with the overarching principles of our approach to child protection.

#### **5. We recognise that:**

- the welfare of children is paramount in all the work we do and in all the decisions we take.
- working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people's welfare.
- all children, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation have an equal right to protection from all types of harm or abuse.
- extra safeguards may be needed to keep children who are additionally vulnerable safe from abuse.

#### **6. We will seek to keep children and young people safe by:**

- Ensure that children and young people attending Edu-Action are aware that there are mentors whom they can approach if they are worried or having difficulty.
- Adopt child protection and safeguarding best practice through our policies, procedures and code of conduct for staff and volunteers
- Provide effective management for staff and volunteers through supervision, peer learning and group supervision support, training and quality assurance
- Measures ensuring all staff and volunteers know about and follow our policies, procedures and behaviour codes with confidence.
- Managers to ensure colleagues have time to engage in peer learning and knowledge exchange
- Recruit and select staff and volunteers safely, ensuring all necessary checks are made.
- Record, store and use information professionally and securely in line with Data Protection legislation and guidance.
- Share information about safeguarding and good practice with children and their families
- Ensure that children, young people and their families know where to go for help if they have a concerns.
- Use our safeguarding and child protection procedures to share concerns and relevant information with relevant parties who need to know.
- Create and maintain an anti-bullying environment and ensuring that Edu-Action have a policy and procedure to help us deal effectively with any bullying that may arise
- Use our procedures to manage any allegations against staff and volunteers appropriately.
- Ensure that we have an effective complaints and whistleblowing measures in place.

- Ensure that we provide a safe environment for children and young people by applying good health and safety standards complying with relevant regulatory guidance.
- Build a safeguarding culture where all staff and volunteers, children and young people treat each other with respect and are comfortable about sharing concerns. This includes identifying and challenging discrimination and negative stereotypes.

## 7. Reporting concerns

You may be concerned about harm to another person because of something you have seen or heard, information you have been told by others or because someone has confided in you about things that are happening or have happened to them.

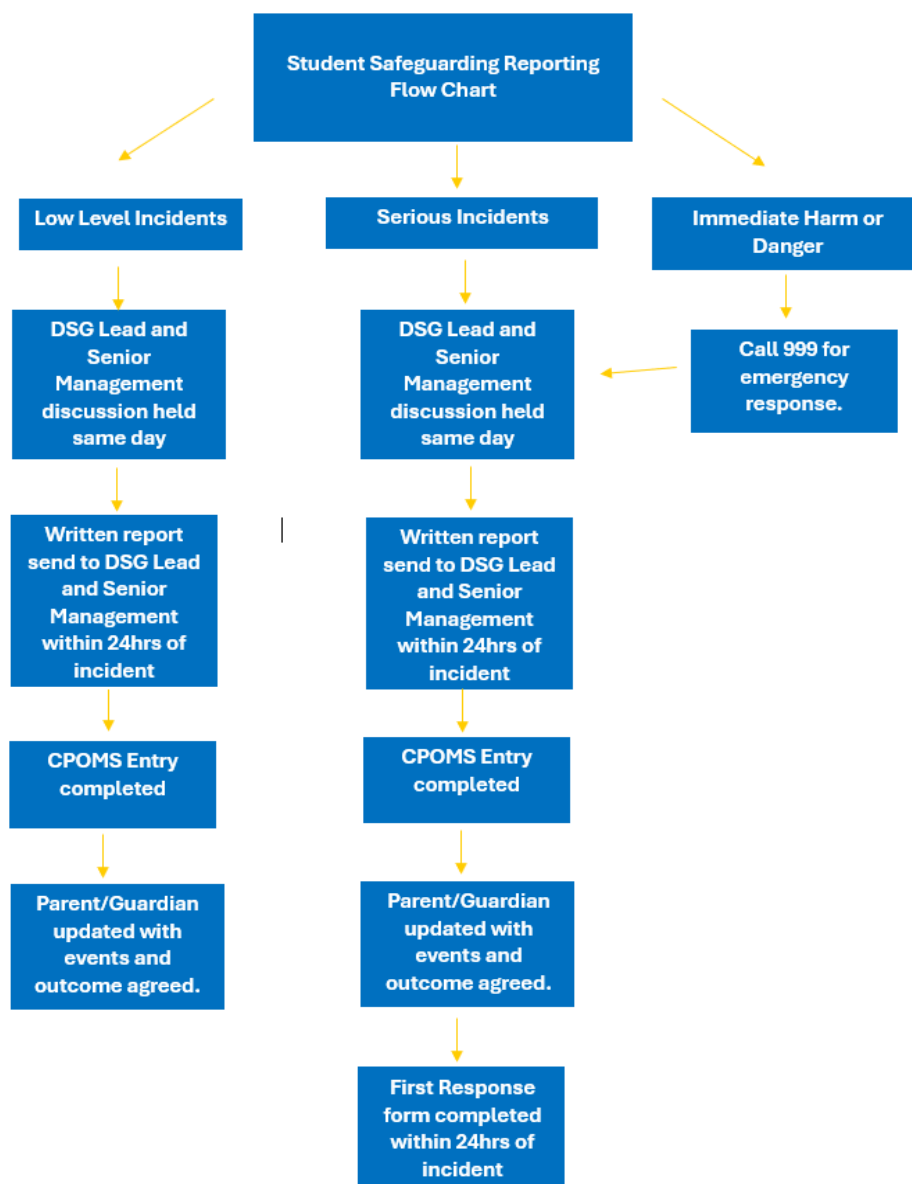
**You should not keep safeguarding concerns to yourself. If you have concerns and/or you are told about possible or alleged abuse, poor practice or wider welfare issues you must contact the Edu-Action Bristol Ltd Designated Safeguarding Lead (DSL) or Deputy Safeguarding Officer (DSO) as soon as you can.**

If the DSL is implicated or you think has a conflict of interest, then report to the DSO.

| Role                               | Name            | Contact Details         |
|------------------------------------|-----------------|-------------------------|
| Designated Safeguarding Lead (DSL) | Elaine Clements | elaine@edu-action.co.uk |
| Deputy Safeguarding Officer (DSO)  | Philip Maggs    | phil@edu-action.co.uk   |
| Deputy Safeguarding Officer (DSO)  | Tai Wheadon     | tai@edu-somerset.co.uk  |

### Reporting flow Chart

**Schools and Commission bodies will be notified immediately if safeguarding concerns arise.**



See Appendix 2 for more information on the reporting procedure.

## 8. Contact Details

| Role                               | Name            | Contact Details         |
|------------------------------------|-----------------|-------------------------|
| Designated Safeguarding Lead (DSL) | Elaine Clements | elaine@edu-action.co.uk |
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## 9. Training

All Edu-Action Bristol Ltd Staff must undergo safeguarding training and have enhanced DBS in place before commencing work. This training will cover the principles of safeguarding, recognising signs of abuse, and the procedures for reporting concerns as well as ensuring those working in applicable environments are suitably checked via the DBS process.

## 10. Policy Review

This policy and procedures followed will be reviewed annually or when there are significant changes in legislation or guidance. This is to ensure our policy and procedures remain up to date and reflective of the procedures followed and any feedback received.

This policy will be revised in September 2026, or beforehand where required.

## 11. Acknowledgement and signature

|                 |                |             |                |
|-----------------|----------------|-------------|----------------|
| <b>Signed</b>   | SJ. Billingham | <b>Name</b> | Sam Billingham |
| <b>Position</b> | Director       | <b>Date</b> | 25/09/2025     |

## Appendix 1 - Recognising the signs and symptoms of abuse

### 1. Definitions

A **child or young person** is anyone up until their 18th birthday.

Under the Care Act (2014), an **adult at risk** is someone over 18 years old who:

- has care and support needs.
- is experiencing, or is at risk of, abuse or neglect.
- as a result of their care and support needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

If an adult has care and support needs but is not currently receiving care or support from a health or care service, they may still be an adult at risk.

An adult at risk may therefore be a person who:

- is old and frail due to ill health, physical disability or cognitive impairment.
- has a learning disability.
- has a physical disability and/or a sensory impairment.
- has mental health needs including dementia or a personality disorder.
- has a long-term illness/condition.
- misuses substances or alcohol
- is a carer such as a family member/friend who provides personal assistance and care to adults and is subject to abuse.
- is unable to demonstrate the capacity to make a decision and is in need of care and support.

Although, anyone can be at risk of abuse or exploitation.

### 2. Recognising signs and symptoms of abuse

Any child, young person or adult at risk can experience abuse or neglect. They may experience harm in a family environment, or in an institution or community setting such as a school or sports club. They may know the person who is abusing them or, more rarely, experience abuse from a stranger. Abuse can happen in person or online, or through a combination of the two.

Individuals can also experience more than one type of abuse, and this can have serious and long-lasting impacts on their lives. Details about the following types of abuse can be found here: <https://learning.nspcc.org.uk/child-abuse-and-neglect/>

- |                                       |  |
|---------------------------------------|--|
| • <b>Physical abuse</b>               | • <b>Online abuse</b>                    |
| • <b>Sexual abuse</b>                 | • <b>Female genital mutilation (FGM)</b> |
| • <b>Emotional abuse</b>              | • <b>Trafficking and modern slavery</b>  |
| • <b>Domestic abuse</b>               | • <b>County lines</b>                    |
| • <b>Neglect</b>                      | • <b>Peer on Peer abuse</b>              |
| • <b>Sexual exploitation</b>          | • <b>Discriminatory (over 18)</b>        |
| • <b>Financial/material (over 18)</b> | • <b>Self-neglect (over 18)</b>          |
| • <b>Bullying and cyberbullying</b>   |  |

Individuals may disclose abuse in a variety of ways, including:

- **directly– making specific verbal statements about what's happened to them**
- **indirectly – making ambiguous verbal statements which suggest something is wrong**
- **behaviourally – displaying behaviour that signals something is wrong (this may or may not be deliberate)**
- **non-verbally – writing letters, drawing pictures, or trying to communicate in other ways.**

Individuals may not always be aware that they are disclosing abuse through their actions and behaviour.



## Appendix 2 - Procedure for dealing with concerns, incidents and disclosures about a child, young person, or adult at risk

### 1. Reporting concerns

You may be concerned about harm to another person because of something you have seen or heard, information you have been told by others or because someone has confided in you about things that are happening or have happened to them.

**You should not keep safeguarding concerns to yourself. If you have concerns and/or you are told about possible or alleged abuse, poor practice or wider welfare issues you must contact the Edu-Action Bristol Ltd Designated Safeguarding Lead (DSL) or Deputy Safeguarding Officer (DSO) as soon as you can.**

If the DSL is implicated or you think has a conflict of interest, then report to the DSO.

| Role                               | Name            | Contact Details         |
|------------------------------------|-----------------|-------------------------|
| Designated Safeguarding Lead (DSL) | Elaine Clements | elaine@edu-action.co.uk |
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**If you are concerned** about harm being caused to **someone else**, please follow the guidance below.

- It is not your responsibility to prove or decide whether a child or young person has been harmed or abused. It is however, everyone's responsibility to respond to and report concerns they have.
- If someone has a need for **immediate medical attention** call an ambulance on 999.
- If you are concerned someone is in **immediate danger** or a **serious crime** is being committed, contact the police on 999 straight away. Where you suspect that a crime is being committed, you must involve the police.
- Remember to be **person centred/make safeguarding personal**. If it will not put them or you at further risk, discuss your safeguarding concerns with the child or young person and ask them what they would like to happen next. Inform them that you must pass on your concerns to your DSL or DSO. **Do not** contact the child or young person before talking to your DSL or DSO if the person allegedly causing the harm is likely to find out.
- **Remember not to confront the person thought to be causing the harm.**

### 2. Responding to specific incidents

#### Child or young person under the supervision of an intoxicated adult

In the event of finding a child or young person under the supervision of an adult (parent/carer) who is intoxicated, the following steps will be taken:

- Event staff members or those concerned about the welfare and safety of the child or young person found in the care of a drunken parents/carers should assess without intervention, whether there are other family members present at the event to take responsibility of the child or young person.
- The person responsible for health, safety & risk management, the event organiser/supervisor should be made aware of the situation along with any SIA trained staff member, if these are required for the event. It will be their responsibility to assess whether intervention is necessary and where it is appropriate to contact the police for assistance.
- Where intervention is required to protect the child or young person, it will be the responsibility of either the health, safety and risk management staff member, the event organiser/supervisor to undertake these actions.
- Where intervention is required, the child or young person will be taken to the 'safe' point location and looked after by the designated member of staff.
- Where possible, other members of the child or young person's family should be contacted to collect and



look after them.

- In the event where other family members cannot be contacted or are unable to look after the child or young person, contact will be made with the police for advice or attendance.
- The incident will be reported to the Designated Safeguarding Lead.

### **Inappropriate behaviour of an adult towards a child, young person, or adult at risk**

Inappropriate behaviour can be subjective but may include:

- Photography or filming specifically of children or young people without the permission of the parents/carers.
- Close physical contact
- Inappropriate language
- Aggressive, abusive, threatening, or violent behaviour.

In the event of finding a person behaving inappropriately towards a child, young person or adult at risk, the following steps will be followed:

- Event staff members or those concerned about the welfare and safety of those involved should assess without intervention, whether there are other family members present at the event to take responsibility of the child or young person.
- The person responsible for health, safety & risk management, the event organiser/supervisor should be made aware of the situation along with any SIA trained staff member, if these are required for the event. It will be their responsibility to assess whether intervention is necessary and, where it is appropriate, to contact the police for assistance.
- Where intervention is required to protect the child, young person or adult at risk, it will be the responsibility of either the health, safety and risk management staff member, the event organiser/supervisor to undertake these actions.
- First contact needs to be calm, and the persons involved need to be told politely that their behaviour is seen as inappropriate for an Edu-Action programme setting and asked to stop or modify their behaviour.
- Where the persons involved do not modify their behaviour or the behaviour escalates, they will be asked to leave the Edu-Action programme facility immediately. Where necessary, Edu-Action Bristol Ltd will contact the police for advice or attendance.
- In the event that a child or young person involved who is not being supervised, they will be taken to the 'safe' point location, until a responsible adult has been located.
- The incident will be reported to the Designated Safeguarding Lead.

### **Responding to a direct disclosure**

If a child, young person, or adult at risk indicates that they are being harmed or abused, or information is received which gives rise to concern, the person receiving the information should:

- Take it seriously.
- Stay calm.
- Listen carefully to what is said, allowing the adult to continue at their own pace.
- Be sensitive.
- Keep questions to a minimum, only ask questions if you need to identify/ clarify what the person is telling you.
- Reassure the person that they have done the right thing in revealing the information.
- Ask them what they would like to happen next.
- Explain what you would like to do next.
- Explain that you will have to share the information with Edu-Action Bristol Limited DSL or DSO.
- Ask for their consent for the information to be shared outside the organisation.

- Make an arrangement as to how you/the DSL can contact them safely.
- Help them to contact other organisations for advice and support (e.g. Police, Domestic Abuse helpline, Victim Support).
- Act swiftly to report and carry out any relevant actions.
- Record in writing what was said using the child or young person's own words as soon as possible.

It is important to **NOT**:

- Dismiss or ignore the concern.
- Panic or allow shock or distaste to show.
- Make negative comments about the alleged perpetrator.
- Make assumptions or speculate.
- Come to your own conclusions.
- Probe for more information than is offered.
- Promise to keep the information secret.
- Make promises that cannot be kept.
- Conduct an investigation of the case.
- Confront the person thought to be causing harm.
- Take sole responsibility.
- Tell everyone.

## Record Keeping

- Make a written record of your concern and submit to the Edu-Action Bristol Ltd DSL or DSO without delay.
- Describe the circumstances in which the concern came about and what action you took/ advice you gave.
- It is important to distinguish between things that are facts, things that have been observed or over-heard and opinions, in order to ensure that information is as accurate as possible.
- If someone has told you about the harm or abuse, use the words the person themselves used. If someone has written to you (including by email, message) include a copy with your report.

**Be mindful of the need to be confidential at all times. This information must only be shared with your DSL or DSO and others that have a need to know, to keep the person safe whilst waiting for action to be taken.**

## Actions of the Designated Safeguarding Lead

The Designated Safeguarding Lead (DSL) should contact the appropriate agency for advice. They should then contact social services in the area the child, young person or adult at risk lives.

The DSL may need to inform others depending on the circumstances and/or nature of the concern:

- Committee member/trustee responsible for liaising with the insurance company or Charity Commission to report a serious incident.
- Committee member/trustee responsible for HR if the allegation concerns a member of staff.
- Chair of committee/trustees if the allegation concerns a member of the committee/trustees.

Suspicions must not be discussed with anyone other than those nominated above. A written record of the concerns should be made in accordance with these procedures and kept in a secure place.

Whilst allegations or suspicions of abuse will normally be reported to the DSL, absence of the DSL or Deputy Safeguarding Officer (DSO) should not delay referral to Social Services or the police.

The role of the DSL is to collate and clarify the precise details of the incident, allegation, or suspicion, and pass this information onto statutory agencies who have a duty to investigate. Additional responsibilities of the DSL can be found in the 'Role description for the Designated Safeguarding Lead'.

## Further information and useful contacts

|   |
|---|
| <p><b>Police (if you are currently witnessing anyone being harmed or in a situation of immediate risk)</b></p> <p>Phone: 999</p>  |
| <p><b>First Response (to report a concern about a child or young person)</b></p> <p>Phone: 0117 903 6444</p> <p>Online form: <a href="https://www.bristol.gov.uk/residents/social-care-and-health/children-and-families/concerns-about-a-child">https://www.bristol.gov.uk/residents/social-care-and-health/children-and-families/concerns-about-a-child</a></p>                      |
| <p><b>Care Direct (to report a concern about an adult at risk)</b></p> <p>Phone: 0117 922 2700 (Monday – Friday, 8:30am – 6pm)</p> <p>Phone: 01454 615 165 (Out of hours)</p> <p>Online Form: <a href="https://digital.bristol.gov.uk/social-care-health/form-contact-adult-care-services">https://digital.bristol.gov.uk/social-care-health/form-contact-adult-care-services</a></p> |
| <p><b>NSPCC Helpline</b></p> <p>Phone: 0808 800 5000</p>  |

### **Appendix 3 - Role description for the Designated Safeguarding Lead**

The Designated Safeguarding Lead (DSL) will act as the main source of support, advice and expertise for safeguarding in our organisation, including:

- Provide staff training face to face on all areas of abuse listed on page 5 of this policy
- Advise and support the committee in developing and establishing the organisation's approach to safeguarding.
- Play a lead role in maintaining and reviewing the organisation's plan for safeguarding.
- Coordinate the distribution of policies, procedures and safeguarding resources throughout the organisation.
- Advise on training needs and development, providing training where appropriate.
- Provide safeguarding advice and support to staff and volunteers.
- Manage safeguarding concerns, allegations or incidents reported to your organisation.
- Manage referrals to key safeguarding agencies (e.g. social services or police) of any incidents or allegations of abuse and harm.

In the event that the DSL is unavailable, the above responsibilities will be handled by the Deputy Safeguarding Officer.

#### **Appendix 4 - Code of conduct for staff**

- To help maintain the well-being of anyone that participates in an Edu-Action programme especially children and vulnerable adults at all times
- Treat everyone fairly and with respect whether they are young or old.
- Be a positive role model
- Act with integrity
- Help to create a safe and inclusive environment
- Not allow any rough or dangerous behaviour, bullying or the use of bad or inappropriate language
- Report all allegations of abuse or poor practice to the Director; Sam Billingham.
- Value and celebrate diversity and make all reasonable efforts to meet individual needs
- Keep clear boundaries between professional and personal life, including on social media
- Have the relevant consent from parents/carers, children and adults before taking or using photos and videos
- Refrain from smoking and consuming alcohol during any Edu-Action programme.
- Ensure roles and responsibilities are clearly outlined and everyone has the required information and training
- Not abuse, neglect, harm or discriminate against anyone; or act in a way that may be interpreted as such

## **Appendix 5 - Safer recruitment of workers**

Edu-Action Bristol Ltd will ensure all workers are appointed, trained, and supervised in accordance with government guidance on safe recruitment.

For individuals new to the organisation, a full application process will be followed, including:

- completion of an application form.
- written references obtained, and followed up where appropriate.
- a disclosure and barring service (DBS) check completed, where appropriate.
- qualifications, where relevant, verified.
- basic safeguarding awareness training.
- the applicant will complete a probationary period.
- the applicant will be given a copy of the organisation's safeguarding policy and procedures, and knows how to report concerns.

For individuals who are well known to the organisation, a shorter application process will be followed.

## **Appendix 6 – Student concerns, reporting process**

Students can report concerns via a number of ways.

We have a worry box for students to raise concerns anonymously. Safeguarding staff that don't work directly with the students make regular welfare checks with both students and parents to ask if there are any concerns.

All students and parents are given the [info@edu-action.co.uk](mailto:info@edu-action.co.uk) email address to report any safeguarding issues.

Contact information is also available on termly bulletins or our website [www.edu-action.co.uk](http://www.edu-action.co.uk) All parents have an Edu-Action work phone number for reporting concerns as well.

Lastly, students are told where and how to report concerns on the safeguarding notice boards visible at all sites.

## Appendix 7 – Definition of Low Level safeguarding concerns

The statutory Keeping Children Safe in Education (KCSIE) guidance includes a specific section on concerns that do not meet the harms threshold. These are termed 'low-level concerns'.

The guidance sets out how schools and colleges in England should deal with low-level concerns with regard to the behaviour of teachers, other staff, volunteers and contractors.

KCSIE also identifies the importance of schools and colleges having appropriate policies and processes in place to manage and record any such concerns and take appropriate action to safeguard children.

A **low-level safeguarding concern** in educational settings refers to any concern about an adult's behaviour that:

- Is inconsistent with the staff code of conduct.
- Does not meet the threshold of harm or is not serious enough to refer to the local authority designated officer (LADO).
- For more information about the role of LADO see the Whistleblowing policy/Safeguarding notice boards/appendix 8


Examples of such behaviour include:

- Being overly friendly with children.
- Having favourites.
- Taking photographs of children on a personal device.
- Engaging with a child one-on-one in a secluded area.
- Using inappropriate, sexualized, or offensive language

Addressing low-level concerns is crucial for maintaining a culture of openness and trust, ensuring that all adults consistently model the school's values and help keep children safe



Appendix 8- Role of LADO. This poster is present at all Edu-action sites.

  
Edu - Action

## **LADO: Local Authorities Designated Officer**


**The Role of a LADO:** Manages allegations of abuse or neglect against people who work with children.

**When to contact LADO:**


- If you have concerns about a person's behaviour towards children
- If you have concerns about a person's suitability to work with children
- If you have concerns about a person's personal life that may affect their work with children
- If you have concerns about a child who is the subject of child protection procedures.


**Any concerns should be made to DSL, if it concerns a lead you can make a referral or contact LADO independently.**

**How to contact LADO:**



Bristol LADO: Nicola Laird

 : [LADO@bristol.gov.uk](mailto:LADO@bristol.gov.uk)

 : 0117 903 7795

A written referral for a formal complaint should be made within one working day.

Link to referral form: [LADO Concerns Professionals Bristol Referral Form](#)

## KCSIE updates 2025

The main relevant updates include changes to attendance, online harms, the role of virtual heads.

Added to the list of online Safeguarding harms are misinformation, fake news and conspiracy theories. It is our role to protect young people's wellbeing from this and be mindful of where news content originates from.

## Statutory Attendance Guidance Now Recognised

The 2024 Working Together to Improve School Attendance guidance is now statutory and explicitly recognised in KCSIE 2025. Key implications include:

- State schools must share daily attendance registers with the DfE
- Clearer expectations on managing admissions and unauthorised absences
- Integration of safeguarding and attendance policies is strongly encouraged