

**Name of Policy:** Safeguarding Children and Vulnerable Adults Policy  
**Date issued:** September 2021  
**Review date:** August 2022  
**Author:** Human Resources  
**Scope:** All Employees

# **The Careers and Enterprise Safeguarding Children and Vulnerable Adults Policy**

## **1. Introduction**

The Careers and Enterprise Company (CEC) is committed to safeguarding the welfare of children and vulnerable adults who come into contact with its staff and fully recognises its responsibilities for safeguarding.

For the purposes of this Policy the term 'child(ren)' is used to describe all children and children under 18. The term 'staff' is used to describe CEC employees, secondees, consultants and volunteers.

Vulnerable adult(s) is used to describe someone who is 18 years or older who:

- has a dependency upon others, or a requirement for assistance from others, in the performance of basic physical functions or
- is in need of community care services by reason of mental health or other disability, age or illness or
- has a severe impairment in their ability to communicate with others or
- has an impairment in their ability to protect themselves from assault, abuse, neglect, harm or exploitation or
- is detained in lawful custody or
- is being supervised as a result of a court order

All staff are responsible for the protection of children and vulnerable adults in who form part of CEC's staff. This Policy applies to all staff and sets out everyone's responsibilities when working or coming in to contact with children and vulnerable adults in the course of their normal duties, for example, events, focus groups, work experience and placements. Failure to comply with this policy will be taken extremely seriously and may result in action being taken under CEC's disciplinary procedure.

Staff should refer to the 'Good Practice Guidelines' annexed in Appendix 1 for guidance on the types of behaviour that are acceptable and the types of behaviour that are inappropriate.

## **2. Policy Statement**

CEC believes that:

- all children and vulnerable adults, regardless of age, disability, gender, racial or ethnic origin, religious belief and sexual identity have a right to protection from harm or abuse; and
- the welfare of the child and vulnerable adult is the paramount consideration.

CEC undertakes to:

- treat children and vulnerable adults with care, respect and dignity;
- ensure that all staff recognise they may be perceived by children and vulnerable adults as trusted representatives of CEC;
- ensure communication with children and vulnerable adults is open and clear and that, where appropriate, records of official communication are kept;
- appropriately identify and assess risks of its activities arranged for children and vulnerable adults where relevant;
- investigate fully any concerns raised by staff in connection with the welfare of children and vulnerable adults in CEC's care; and
- provide suitable levels of support and training to staff consistent with their involvement with children and vulnerable adults in the workplace.

Through this Policy CEC will ensure that:

- we practice safe recruitment by checking the suitability of staff who work with children and vulnerable adults;
- all staff are able to make informed responses to specific safeguarding issues;
- all staff are able to report any concerns through the appropriate channels;
- any allegations of harm or abuse or concerns over the welfare of children and vulnerable adults are taken seriously and responded to promptly and appropriately.

In following this Policy, staff are always expected to maintain a sense of proportion and protect the child's or vulnerable adult's welfare as a priority.

It is not intended that this Policy should restrict staff from normal ways of working, but staff should always consider how an action or activity might be perceived as opposed to how it is intended.

### **3. Recruitment and Disclosure Checks**

The vast majority of people who want to work or volunteer for CEC are well motivated and will provide a quality support to careers education. CEC have taken all reasonable steps to ensure that their recruitment process is effective in helping to screen out and discourage individuals who may try to gain access to children and vulnerable adults for inappropriate motives.

Effective recruitment and selection processes can narrow out these risks. As a minimum CEC commits that all recruitment procedures are as follows;

- Job descriptions are made so the individual understands what is expected of them;

- Adverts are posted so individuals understand how to apply and what is required of them;
- When applicants apply, they can self-declare any criminal convictions;
- At least two CEC members of staff meet the applicant before offer and an interview takes place to make sure any gaps in their application are filled in; and,
- All new staff attend an induction, and some have specific training. Through this they learn about CEC's policies and procedures to which they are expected to adhere.

Other relevant documentation checks and risk assessments may also be carried out and accounted for where relevant.

Volunteer recruitment for the Enterprise Adviser Network is undertaken by our partner organisations (predominantly Local Enterprise Partnerships), who hold the responsibility for safeguarding within the local operations. However, CEC requests and checks that all Enterprise Advisers through the recruitment process:

- Go through an application process and are interviewed to assess suitability for the volunteer role.
- Receive a clear volunteer role description which outlines the expectations of their role.
- Receive training to be able to undertake their role.
- *Sign a volunteer code of conduct which confirms their agreement to deliver that role and adhere to relevant policies.*
- Are subject to a DBS check in order to undertake their role.

It should be noted that Enterprise Advisers are recruited to support teachers and senior leadership teams with strategic planning for careers education and would rarely be in a situation where they were working directly with young people or vulnerable adults. Enterprise Advisers should adhere to the safeguarding policy of the school, college or education institution they are matched to.

#### **4. Safeguarding Officer and Safeguarding Liaison**

CEC has appointed Nicola Hall, Director of Education to have overall responsibility for compliance with this Policy (the “**Designated Safeguarding Officer**”).

For all CEC organised or approved activities and events involving children or vulnerable adults, the Designated Safeguarding Officer will lead on safeguarding, raising awareness of this Policy and its guidelines among other staff and, where appropriate, the children/vulnerable adults.

The Safeguarding Officer will:

- agree which positions require enhanced disclosure checks;
- be the focal point for all safeguarding questions
- provide safeguarding support to student facing teams
- have responsibility to provide advice and guidance to staff who during the course of their work, believe that a child or vulnerable adult may be at risk of harm and/or have concerns over a child's or vulnerable adult's welfare.

The Safeguarding Officer shall receive appropriate training and support to undertake their respective roles.

## **5. How do I raise a concern?**

Staff should remember that they are not formally trained to deal with situations of abuse, concerns over a child's or vulnerable adult's welfare or to decide if abuse has occurred and should therefore immediately report any concerns following the procedures below.

All concerns, allegations or actual incidents under the supervision of CEC shall be reported to the Safeguarding Officer.

The Safeguarding Officer will investigate the concerns and/or allegations, complete a 'Logging a Concern' form as attached at Appendix 3 and keep such other appropriate written records. The Safeguarding Officer will ensure that all such records are kept securely in locked locations within HR.

The investigation may result in external organisations such as the child's school or social services being contacted. In other instances it may result in procedures being invoked, such as the disciplinary and/or grievance procedures.

All information in relation to such incidents should be recorded and must include as a minimum:

- The date and time of the disclosure, concern, allegation or actual abuse incident;
- Details given about the incident;
- An indication of the parties involved;
- Details of any action that CEC has taken; and
- Details of further reporting actions (e.g. to relevant agencies and organisations). If, for any reason, it is decided that it is not appropriate to consult with a relevant statutory agency, a full explanation must be documented.

CEC recognises the difficulty staff may have in reporting these types of concerns to their work colleagues. As part of the arrangements made by CEC to facilitate

and accommodate any such difficulties, staff can report concerns in strict confidence to our named Board Member: Julia Clevedon.

Any concern raised will be treated confidentially and, if you wish, anonymously. It will be passed by the specialist organisation to the Safeguarding Officer who will review the information and determine how best to address the issues raised.

An indication of how CEC proposes to deal with the matter will be given within 7 days but more quickly where reasonably possible. An indication of the likely time-scales involved in providing a final response will also be provided.

If it is not possible for initial enquiries to be completed within 7 days the Board Member will provide feedback to explain the situation. If a decision is made not to investigate further, an explanation will be provided of the reasons for the decision.

## **6. Involvement of Children at CEC**

CEC are passionate about involving young people in shaping the organisations' work. As such, young people may be involved with CEC in a number of ways ranging from being participating in events, undertaking work experience placements, being involved in focus groups or user research to co-create elements of programmes, on youth advisory groups or online through CEC's digital platforms including the CEC website.

CEC recognise that our work is an excellent opportunity to not only help young people shape the interventions that will support them and their peers, but also to build their skills by being involved, preparing and inspiring young people for their future.

Young people will also be involved in activities delivered by CEC's network. The responsibility for safeguarding for young people and vulnerable adults working in programmes funded or co-funded by the Careers and Enterprise Company sits with the delivery organisation.

All CEC employees will adhere to institutional safeguarding policies when working in education settings.

CEC recognise their duties under health and safety law with respect to assessing the risks to children and managing those risks so as not to harbour risk adverse behaviour, but provide opportunity to foster an early understanding of the importance of health, safety and wellbeing. Further guidance is provided in Appendix 4.

All children taking part in CEC approved activities at CEC's offices and also at CEC approved off site venues must as a minimum requirement have the consent of the child's parent or guardian and complete an assessment of risks in accordance with the guidance in Appendix 4.

It is the responsibility of the activity owner to ensure that the consent form at Appendix 2 is completed, signed and the original returned to the Safeguarding Officer.

It is the responsibility of the line manager responsible for the activity involving children to complete the risk assessment (Appendix 4) with support from the Health and Safety representative where necessary.

### **PREVENT Duty**

The Government's PREVENT strategy focuses on stopping people becoming terrorists or supporting terrorism. It is part of the Government's counter terrorism strategy CONTEST, which is led by the Home Office.

The Careers & Enterprise Company recognise their role in the PREVENT duty which has 3 national objectives:

- **Objective 1:** respond to the ideological challenge of terrorism and the threat we face from those who promote it.
- **Objective 2:** prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support.
- **Objective 3:** work with sectors and institutions where there are risks of radicalisation which we need to address.

In respect of the PREVENT agenda, the company will ensure that:

- CEC staff have adequate training and know how to safeguard and support vulnerable individuals, whether service users or staff, who they feel may be at risk of being radicalised by extremists.
- Appropriate systems are in place for staff to raise concerns if they think this form of exploitation is taking place.
- CEC promotes and operates safe environments where extremists are unable to operate

If any member of CEC or representative of has concerns regarding the radicalisation of an individual they should report to the Designated Safeguarding Officer.

### **Working for CEC and prevention of Modern Slavery:**

CEC will not employ children in the company. We know that slavery, servitude, forced labour and human trafficking (Modern Slavery) is a global and growing issue given the rapid rise in global migration, existing in every region in the world and in every type of economy, whether industrialised, developing or in transition. No sector or industry can be considered immune or untainted. CEC has a zero tolerance approach to Modern Slavery of any kind within our operations, partners and supply chain. We all have a responsibility to be alert to the risks, however small, in our organisation and in the network of providers that we engage. Staff are expected to report concerns, using the appropriate reporting channels, and management are expected to act on them. Any concerns should also be able to the designated safeguarding lead (Nicola Hall)

### **Internet:**

CEC recognises that the internet plays an important part in children's lives for education and entertainment. CEC takes a number of additional precautions when engaging with children through online media.

- All UGC content featured on the CEC website is pre-moderated by CEC or its external moderation company, and editors are trained not to publish any content which infringes online child safety best practice.
- Access to user data, which could include information about children, is restricted to known handlers.
- Communication sent to known children will be conducted only by individuals who are DBS checked.
- Members of the CEC's digital team will be DBS checked to prepare them for coming into contact with UGC created by children as required.

The individual's parent or guardian must consent to any images used in online media which contain children before they can be uploaded.

#### **PR Events and Photographs:**

CEC's commitment to inspire and prepare young people for the world of work means that images will be taken to capture activity and share best practice.

CEC fully recognises the potential sources of child abuse and imagery places a huge part of this and the ways imagery can be used to cause abuse, child pornography and recognitions of those children in protection programmes.

For the purpose of this Policy, images are all photographs that are taken on film, digital camera and moving pictures.

CEC's policy is to seek written consent from a child's parent or guardian to take and use images of any children under the supervision of CEC. Parents and guardians should be made aware of when, where and how the images may be used in order to give their informed consent.

CEC commit that;

- images will not be used for anything other than what was initially agreed with the parent/guardian;
- no images will be taken by anyone where a child might be undressed
- photographs will focus on the activity, rather than the child itself;
- where possible photographs will contain groups of children rather than the individual and;

CEC recognise that;



- It is not an offence for someone to take an appropriate photograph on public property even if asked not to do so.

### **Work Experience/Placements:**

CEC may invite children to take up work experience with CEC from time to time. Work experience will be managed by HR and any offers of work experience should be in accordance with the internal work experience policy.

## **7. Health and Safety**

Any risk assessment conducted in line with our Health and Safety Policy involving activity working with children and vulnerable adults must take account of their particular vulnerabilities, please refer to Appendix 4.

## **8. Travel and Transport**

When children are being transported on behalf of CEC they should be accompanied by a parent, guardian, teacher or chaperone, previously identified to CEC as such.

In exceptional cases where a child/children are to be transported unaccompanied by a parent, guardian, chaperone or teacher, this must be by a member of CEC staff who has a satisfactory DBS check, and in either case only with the specific prior written consent of their parent or guardian.

Please use the Parental Consent Form attached at appendix 2 and provide the signed original to HR.

This does not apply in the case of children attending work experience placements at CEC offices, where the work experience agreement will cover parental consent for the placement, which will include children travelling to and from the placement unaccompanied.

## **9. Accommodation**

Any child must be accompanied by a parent, guardian, chaperone or teacher if required to stay overnight on CEC business or CEC approved events.

## APPENDIX 1

CEC staff and volunteers regularly working within education settings should familiarise themselves with Keeping Children Safe in Education ([updated September 2021](#))

In addition, from September 2020, DfE have issued [safe practice guidance](#) for education settings regarding infection control.

### Good Practice Guidelines

The following are common sense examples of how to create a positive culture and climate when engaging with children or vulnerable adults in the workplace.

Good Practice means:

- Always working in an open environment (e.g. avoiding private or unobserved situations and encouraging open communication with no secrets). Never allow yourself to be left alone with a child or vulnerable adults. There may be rare occasions when a confidential interview or a one-to-one meeting is necessary and in such circumstances, the interview should be conducted in a room with an open door or visual access. Where this is not possible, the member of staff should ensure that there is another member of staff nearby.
- Never making gratuitous physical contact with a child or vulnerable adult. There may be occasions where a distressed participant needs comfort which may include physical comforting and staff should use their discretion to ensure that it is appropriate and not unnecessary or unjustified contact.
- Treating all children and vulnerable adults equally, and with respect and dignity. CEC will take positive action to eliminate discrimination against any person or group of people. Staff should ensure that children and vulnerable adults are protected from discrimination on any grounds, including ability and challenge discriminating comments and behaviour. Activities should be designed to include all children and vulnerable adults and to promote positive attitudes towards differences.
- Being clear about what the objectives of the activity are before it begins and always put the welfare of each child or vulnerable adult first, before winning or achieving goals.
- Maintaining a safe and appropriate distance with children and vulnerable adults (e.g. it is not appropriate for staff or volunteers to have an intimate relationship with a child).
- Building balanced relationships based on mutual trust which empowers children and vulnerable adults to share in the decision-making process.
- Ensuring that if children and vulnerable adults of mixed genders are to be supervised, they should always be accompanied by a male and female member of staff.
- Conducting yourself in a manner that sets a good example to the participants. Be an excellent role model – this includes not smoking or drinking alcohol or swearing in the company of/whilst responsible for children.

- If you know that a child is participating in or attending a CEC social event or function give careful thought to any issues that may arise and consult with HR in advance to best address these issues.
- Giving enthusiastic and constructive feedback rather than negative criticism.
- Never using physical force against a child or vulnerable adult, unless it constitutes reasonable restraint to protect him/her or another person or to protect property. If it is necessary to restrain a child or vulnerable adult because they are an immediate danger to themselves, others or to property, then the minimum amount of force should be used for the shortest amount of time. Remain calm and get the attention and support of other staff. The incident should be recorded in writing, with a witness statement (where possible), immediately afterwards.
- Always referring any problems to the Safeguarding Officer.
- Questioning any unknown adult who enters CEC's premises and/or who attempts to engage with a child or vulnerable adult.
- Escalating any concerns about young people at risk of radicalisation to the Safeguarding Officer, who can liaise with the school about a referral to the Channel programme, if appropriate.

Practices never to be sanctioned:

- Engaging in rough, physical or sexually provocative games, including horseplay.
- Sharing a room with a child or vulnerable adult.
- Engaging in any form of inappropriate touching.
- Children's or vulnerable adult's inappropriate use of language and/or behaviour. This should always be challenged.
- Making sexually suggestive comments to a child or vulnerable adult, even in fun.
- Reducing a child or vulnerable adult to tears as a form of control.
- Allegations made by a child or vulnerable adult to go unchallenged, unrecorded or not acted upon.
- Doing things of a personal nature for children or vulnerable adults that they can do for themselves (e.g. apply sunscreen).
- Inviting or allowing children or vulnerable adults to stay with you at your home or arrange meetings outside of CEC approved venues.

## APPENDIX 2

### The Careers and Enterprise Company (CEC): Parental/Guardian Consent Form

#### 1. Details

Child's Full Name .....

Address .....

.....

.....

.....

Date of Birth ..... Age .....

Male/Female (please circle)

#### 2. Consent for child to take part in on and off site activities

I am the parent/guardian for the above-named child and give my consent that they may take part in CEC approved activities at CEC's offices (INSERT ADDRESS) and also at CEC approved off site venues.

#### 3. Consent for child to attend [INSERT EVENT] and take part in PR/Media

I also give my consent that my child may attend the [INSERT EVENT] which will take place at [INSERT LOCATION] on the [INSERT DATE(S)] between [INSERT TIMES].

I acknowledge the need for my child to behave responsibly at all CEC organised and/or approved events.

I also **DO/DO NOT** (please circle) my consent that my child can be photographed as a part of taking part in the event and that these photographs can be used to promote

CEC activities e.g. on their website or in media, subject to only their first name and school (if applicable) being referred to in the captions.

**4. Medical Information**

Does your child have any condition requiring medical treatment, including medication and/or is your child allergic to any medication? **YES / NO** (please circle)

If YES, please give details

.....  
.....  
.....  
.....

I hereby agree to my child receiving medication as instructed and to any emergency dental, medical or surgical treatment, including anaesthetic or blood transfusion, as considered necessary by the medical authorities present.

**5. Special Dietary Requirements**

Does your child have any special dietary/religious or cultural requirements?  
**YES / NO** (please circle)

If YES, please give details

.....  
.....  
.....  
.....

**6. Doctor Details**

Names of Family Doctor .....

Address .....

.....

.....

.....

Telephone Number .....

**7. Parent/Guardian Contact Details**

Name .....

Address .....

.....

.....

Home Telephone .....

Work Telephone .....

Mobile Telephone .....

Relationship to Child .....

**8. Alternative Emergency Contact Details**

Name .....

Address .....

.....

.....

Home Telephone .....

Work Telephone .....

Mobile Telephone .....

Relationship to Child .....

**9. Signature(s) of Parent(s)/Guardian(s)**

Signed .....

Name (print) .....

Relationship with Child .....

Date .....

### APPENDIX 3

#### The Careers and Enterprise Company: Logging a Concern Form

Your Name .....

Position/Job Title .....

Date .....

Time .....

Name of child(ren) .....

Does the child(ren) know this incident is been reported?

(Please circle) YES NO

Does the main Team leader/supervisor/chaperone of the Child(ren) know this incident is been reported?

(Please circle) YES NO

Please provide a brief description below about the incident;

Who? .....

What? .....

Where? .....



When? .....

Offer an opinion, if relevant

.....

Note of any action taken by you:

.....

Name of person to whom your information is being passed:

.....

(Print) .....

(Signature) .....

## **Appendix 4**

### **Risk Guidance**

#### **Your role**

- Understanding the characteristics of children and vulnerable adults.
- Understanding and awareness of your behaviour and its potential to influence a child or vulnerable adult.
- Being aware of the full picture: health, welfare and level of supervision suggested by a parent/carer/guardian.
- Recognising a need for help and knowing where to get assistance from.
- Acknowledging that children/vulnerable adults require specific attention and greater supervision.

#### **What should an assessment cover?**

- The characteristics of children/vulnerable adults and activities that present significant risks to their health and safety.
- Safe guarding your health.

#### **Children from a safety perspective:**

- Why do we need to specifically consider the risks to children in the work environment and how does that effect the way in which we work safely?
- All people are at particular risk of injury in the first six months of a job as they may be unaware of existing or potential risks. Children will frequently be in this category.
- Children may lack experience or maturity or may be unaware of how to raise concerns.

- They may not have reached physical maturity and therefore lack the strength demanded.
- They may be eager to impress or please people with whom they work.

### **Principles of risk assessment**

Consider:

- Physical and psychological capacity of the young person
- Pace of work
- Temperature extremes, noise and vibration
- Radiation
- Hazardous substances
- Lack of training and experience

Specific factors:

- The fitting/layout of the workplace and the particular area they will work in or be visiting;
- The nature of any physical, biological and chemical agents they will be exposed to, for how long and to what extent;
- What types of work equipment will be used and how will this be managed;
- The need to assess and provide health and safety training;
- Risks from particular agents, processes and work.

Ask yourself:

Is this a routine activity?

- If not what new hazards are there and what is the risk?
- What do you do in the event of an incident/emergency?
- What do you do in the event of a complaint or allegation?

- How can you avoid adverse behaviour?
- How have you communicated your plan of action and how have you made sure it is understood?

Feedback and building trust:

Lack of experience in the world of work presents a need for a managed approach that ensures the safety of children and does not compromise your personal safety and professionalism.

Children should be invited to discuss their views on what they are being asked to do and be encouraged to develop an understanding of risk and proportionate risk management.

Working practises and methods of engagement should be reviewed in light of feedback and new information.

## APPENDIX 5

### **The Careers and Enterprise Company: Parental/Guardian Letter and Consent Form User Testing**

Dear Parent

I am the User Researcher working at The Careers & Enterprise Company. We are an employer-led organisation that has been set up to inspire and prepare young people for the fast-changing world of work. We aim to help motivate young people, support them in making informed choices about their future and help them achieve against those choices. Our role is to take an umbrella view of the landscape of careers and enterprise, supporting programmes that work, filling gaps in provision and ensuring coverage across the country.

As part of this process we are inviting young people to participate in a one on one interview which will help to inform the design of a new product and make sure that young peoples' needs are met.

The interviews will last for 45 minutes. With your permission the sessions will be audio recorded but any recordings will be kept confidential and only used for the purposes of checking the notes. Your child will not be identified in the research results.

Your child's participation in this research would be greatly appreciated. I hope your child will enjoy participating in my research. It is really important for The Careers & Enterprise Company to gain an understanding of young peoples' attitudes about their future work life to help us build digital products which will meet their needs.

Please see the parental information sheets and consent form for more information.

Many thanks,

xxx

**User Researcher  
Careers & Enterprise Company**

# Parental information sheet

## **Why is the research being conducted?**

The research is being conducted as part of the design of an online “enterprise passport”, to encourage young people to broaden their experiences and skills in a way that can be showcased to support future employment.

## **Who else will be taking part?**

Other students from schools around the UK will be taking part in this research.

## **What questions will my child be asked?**

Your child will be asked questions about their experiences so far of guidance and support into the world of work as well as what activities they particularly enjoy.

## **Does my child have to take part?**

Participation in this research is voluntary; it is your decision if you want your child to take part. If your child decides to take part but then changes their mind then they have the right to withdraw from the study at any time without giving a reason.

## **What will happen to my child if they take part?**

If your child agrees to participate, they will be involved in an individual interview which will last no longer than 45 minutes. The interview will be audio recorded and typed up later on a password protected computer.

## **What are the benefits of my child taking part?**

I hope they will enjoy helping the Careers & Enterprise Company with our research. We will be discussing topics around future work plans and the feedback will help inform the design of the enterprise passport.

## **Who will know that my child has participated in the research?**

Apart from the teacher organising the interviews I am the only person that will know that your child has participated in the research. Myself and the organising teacher will not disclose anything they tell me.

My notes will be kept safely and there will be full anonymity – your child’s name will be changed in the write up of this research.

# Parental consent form

**Please read and complete this form**

**Topic of study:** The Careers and Enterprise Company User Research

**Institution:** The Careers and Enterprise Company

**Purpose:** User research for the purpose of discovering the requirements of our digital product users.

*Please tick the boxes to confirm:*

I understand that the information my child gives to the researcher will be held securely and anonymised when written up.

I understand that my child can withdraw from the research at any point.

I agree for my child to participate in this study.

I agree for the interview to be recorded (audio only).

**Parent's signature:**.....

**Print name:**.....

**Date:**.....

**Researcher's signature:**.....

**Print name:**.....

**Date:**.....