

## Safeguarding Children and Vulnerable Adults Policy (including e-Safety) v9

### KEY PERSONNEL CONTACT DETAILS

Designated Safeguarding Officer (DSO): Jessica Evans – [jess@anydriver.co.uk](mailto:jess@anydriver.co.uk) 07379 077954

Designated Safeguarding Lead (DSL): Neil Evans - [neil@anydriver.co.uk](mailto:neil@anydriver.co.uk) / 07827 228558

### PURPOSE, BACKGROUND AND OUR APPROACH

The welfare of a child and vulnerable adult is paramount. Abuse is a term to describe ways in which children and vulnerable adults are harmed, usually by adults and often by people they know and trust. It refers to the damage done to a child or vulnerable adult's physical or mental health. New forms of abuse such as internet grooming, financial abuse of older people and the extreme difficulties faced by young asylum seekers, mean our policies and procedures need to be continually reviewed to keep abreast of these developments.

Abuse can occur within or outside the family including a place of learning or training. Safeguarding, if it is to have an impact, must become the responsibility of everyone. All employees, directors, board members, partners and other stakeholders have a responsibility to actively make the environment a safe and secure place for all.

Recognising that our learners are adults, some of whom may be At Risk, we have adopted a risk-based, proportionate approach to safeguarding and the Prevent Duty. Working in the Beauty sector can mean that learners are more likely to come across safeguarding concerns, including sexual harassment due to physical contact and closeness students, tutors and models have with each other. The Safeguarding team use a structured approach to normalising the essential physical contact, compared to what would be considered inappropriate.

We bring the policy to life through our training sessions, to help learners distinguish between appropriate and inappropriate behaviours. We promote and ensure commitment to this policy through regular staff meetings, safeguarding team discussions, staff, contractors and volunteer inductions, annual training, policy updates, case studies and sharing of relevant news.

### DEFINITIONS

The Children Act 1989 and 2004 defines a 'child' as:

- A person under the age of 18

The Safeguarding Vulnerable Groups Act 2006 defines a 'vulnerable adult' as:

- Person aged 18 and over, and;
- Receiving a social care service
- Receiving a health service
- Living in sheltered accommodation
- Detained in custody or under a probation order
- Requiring assistance in the conduct of his/her affairs
- Receiving a service or participating in an activity targeted at older people
- People with disabilities or with physical or mental health conditions

## POLICY STATEMENT

Any Driver Ltd is fully committed to providing a working and learning environment that is free from abuse and harm. It will strive to maintain a safe culture within all of its work and learning environments by clearly identifying and communicating the roles and responsibilities within the organisation for safeguarding; having clear audited procedures in place; training staff in safeguarding procedures and by allocating sufficient resources to safeguarding; applying a zero tolerance to any form of abuse and harm. This policy is also designed to protect the staff of Any Driver Ltd against false allegations.

All children and vulnerable adults whatever age, culture, disability, gender, ethnic origin, religious beliefs and/or sexual identity have the right to protection from abuse. All suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately.

Any Driver Ltd will clearly identify their Designated Persons (DSO), their location and contact details in formats that are easily accessible to all staff and learners. There will be a deputy in case of sickness, annual leave or in the event of an allegation made against the DSO.

## SCOPE

All staff and freelancers are expected to uphold the highest standards in managing risk and actively protecting children, young people, and At Risk adults from discrimination and avoidable harm. This includes fulfilling their statutory duties under current legislation, including:

- Education and Training (Welfare of Children) Act 2021 - [Education and Training \(Welfare of Children\) Act 2021 \(legislation.gov.uk\)](#)
- Keeping Children Safe in Education (*DfE statutory guidance for schools and colleges*) 2024 - [Keeping children safe in education - GOV.UK \(www.gov.uk\)](#)
- Working together to safeguard children: A guide to inter-agency working to safeguard and promote the welfare of children (*HM Government*) 2023 - [Working together to safeguard children - GOV.UK \(www.gov.uk\)](#)
- What to do if you're worried about a child being abused (*HM Government*) March 2015 - [Stat guidance template \(publishing.service.gov.uk\)](#)
- Prevent duty guidance: DfE for further education institutions in England and Wales 2023 - [Prevent duty guidance: for further education institutions in England and Wales - GOV.UK \(www.gov.uk\)](#)
- Section 26(1) of the Counterterrorism and Security Act 2015 – “A specified authority must, in the exercise of its functions, have due regard to the need to prevent people from being drawn into terrorism.”
- Martyn’s Law (2024) - <https://www.protectuk.police.uk/martyns-law>
- The Care Act 2014 - [Care Act 2014 \(legislation.gov.uk\)](#)
- Care and Support Statutory Guidance (updated 2024) - [Care and support statutory guidance - GOV.UK \(www.gov.uk\)](#)
- The Mental Capacity (amendment Act (2019) - [Mental Capacity \(Amendment\) Act 2019 \(legislation.gov.uk\)](#)

## POLICY FOR STAFF, FREELANCERS AND CONTRACTORS

Any Driver Ltd is committed to a policy in which:

Recruitment procedures comply with safeguarding best practice 'safer recruitment' and will be followed in the appointment of all staff. Where staff are required to have contact with children or vulnerable adults, Any Driver Ltd will only recruit or appoint staff who are deemed suitable to work with children or vulnerable adults.

Existing members of staff moving into roles that have direct contact with learners will undergo a Disclosure and Barring Service (DBS) check and obtain a certificate to prove they are suitable to working as an Assessor in the FE/Skills sector.

Any Driver Ltd staff working with children and vulnerable adults will be issued with a copy of this policy. Any member of staff found in breach of this guidance will be subject to disciplinary procedures in accordance with the Any Driver Ltd policy.

All new members of staff and learners who are under the age of 18 will have a Young Person's Risk Assessment carried out as per the Health and Safety Policy Statement.

As part of the initial advice and guidance session or induction session, all new learners will be shown the Safeguarding Children and Vulnerable Adults Policy. This will be followed by discussion to check understanding, and periodically reviewed at a formal review meeting. Any Driver Ltd will deliver Safeguarding training to all Learners and furthermore knowledge and understanding will be embedded during the programme with the effective use of naturally occurring evidence relevant to the beauty sector. All new employees will be made aware of and issued with this policy as part of their induction, depending on their role.

All children and vulnerable adults within the organisation will be informed that their assessor or tutor will be their nominated contact point for any concerns they may have regarding safeguarding. In addition, they will be given details of the DSO and asked to report any concerns to their assessor or tutor, or DSO.

The assessors and tutors must liaise with the **Designated Safeguarding Officer – Jessica Evans**, with any concerns relating to safeguarding.

Staff must keep a secure and up to date record of all children and vulnerable adults either working in or learning within the organisation. They should monitor their progress on a regular basis to check they are safe from abuse and harm whilst on the qualification.

**Safeguarding** is an all-encompassing term used to describe many aspects of keeping our learner's safe from harm related to but not limited to:

- Learner health, safety and wellbeing
- Child protection
- Child Criminal Exploitation (CCE)
- Protection of adults at risk
- Peer to peer abuse including sexual harassment and violence
- Domestic Violence
- Honour based violence (HBV)
- Bullying, harassment and discrimination including racial abuse
- Abuse and neglect
- Safety from Child Sexual Exploitation (CSE), violence, abuse female genital mutilation (FGM) and forced marriage

- Alcohol, drug and substance misuse
- E-safety including all aspects of electronic communication
- Financial exploitation
- Protecting people from radicalisation and extremism
- Breast ironing
- Slavery and trafficking
- Up-skirting
- Homelessness
- Addiction and drug abuse
- Radicalisation
- Issues related to being a young carer or a care-leaver

## RELATED AREAS TO SAFEGUARDING

### Sexual harassment and violence and online sexual abuse between learners

Sexual violence is rape, assault by penetration, sexual assault or causing someone to engage in sexual activity without consent. Rape is intentional penetration by the perpetrator with their penis without consent and there is no reasonable belief that the victim consents. Assault by penetration is intentional sexual penetration by the perpetrator with a part of their body or anything else without consent and there is no reasonable belief that the victim consents.

Sexual assault is intentional sexual touching of the victim by the perpetrator without consent and there is no reasonable belief that the victim consents. Sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom / breasts / genitalia without consent, can still constitute sexual assault.

Intentionally causing someone to engage in sexual activity without their consent and there is no reasonable belief that they consent is also an offence. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

### What is consent?

Consent is about having the freedom and capacity to choose e.g. saying yes when being pressured, coerced, threatened etc. is not consent. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs.

- A child under the age of 13 can never consent to any sexual activity
- The age of consent is 16
- Sexual intercourse without consent is rape

### Sexual Harassment

'Unwanted conduct of a sexual nature' that can occur between children / young people, online or offline and both inside and outside of an education setting. It can include;

- Sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names.
- Sexual "jokes" or taunting.
- Physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes

(it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature.

- Online sexual harassment - online sexual harassment includes non-consensual sharing of nude and semi-nude images or videos, sharing of unwanted explicit content, up-skirting, sexualised online bullying, unwanted sexual comments or messages (including on social media), sexual exploitation, coercion and threats.
- Online sexual exploitation and abuse is when one person manipulates another person to get them to do something sexual - it's an ongoing cycle of emotional and psychological abuse. This can include things such as forcing or blackmailing someone into sending sexual photos / videos of themselves online or to perform sexual acts over webcam.

Unchallenged sexual harassment creates a culture that can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

### **Harmful Sexual Behaviour (HSB)**

Harmful sexual behaviour (HSB) can occur online and / or offline and can also occur simultaneously between the two. HSB should be considered in a child protection context and take into account the ages and stages of development of the children / young people involved. Children / young people displaying HSB have often experienced their own abuse and trauma. It is important that they are offered appropriate support.

Children / young people's sexual behaviour exists on a wide continuum, from normal and developmentally expected; to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour". The term has been widely adopted in child protection.

### **Forced Marriage**

The tradition of arranged marriages has operated successfully within many countries and communities. A clear distinction must be made between a forced marriage and an arranged marriage. In arranged marriage's the families of both spouses take a leading role in arranging the marriage but the choice whether to accept the arrangements remains with the individuals. In forced marriages at least one party does not consent to the marriage and some element of duress is involved. Forcing someone to marry in the UK is a criminal offence.

Most cases of forced marriage involve young women and girls aged between 13 and 30 years. However, there is increasing evidence to suggest that as many as 15% of victims are male. This includes heterosexual, as well as gay, bi and transsexual men.

### **Child Sexual Exploitation**

Sexual exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where young people (or a third person or persons) receive 'something' e.g. food accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing, and / or another or others performing on them, sexual activities. Child sexual exploitation can occur using technology without the child's immediate recognition; for example, being persuaded to post sexual images on the Internet / mobile phones without immediate payment or gain.

In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person's limited availability of choice resulting from their social / economic and / or emotional vulnerability (National Working Group for Sexually Exploited Children and Young People (NWG) 2008).

Sexual exploitation results in children and young people suffering harm and may be supported to recover whilst others may suffer serious life-long impairments which may, on occasion, lead to their death, for example through suicide or murder.

### **Female Genital Mutilation (FGM)**

Female genital mutilation is a collective term for procedures which include the removal of part or all of the external female genitalia for cultural or other non- therapeutic reasons. This practice is not required by any major religion and medical evidence indicates that female genital mutilation causes harm to those who are subjected to it. Girls may be circumcised or genitally mutilated illegally by doctors or traditional health workers in the UK or Ireland or sent abroad for the operation.

Female circumcision, excision or infibulation (FGM) is illegal in both Ireland and UK.

### **Modern Slavery / Trafficking**

Modern Slavery includes exploitation in the sex industry, forced labour, domestic servitude in the home and forced criminal activity. These types of crimes are often called human trafficking. It can be perpetrated against men, women, and children, and include victims that have been brought from overseas, and vulnerable people in the UK and Ireland, being forced to work illegally against their will in many different sectors, including brothels, cannabis farms, nail bars and agriculture. Threats, use of force or other forms of coercion, abduction, abuse of power or position of vulnerability are just some of the ways perpetrators will force their victims to concede.

### **Honour Based Violence**

Honour' based violence is a crime committed when family members of acquaintances feel that dishonour (shame) has been brought to their family or community by doing something that is not in keeping with traditional beliefs of their culture. For example; having a relationship with someone from a different culture or religion, wearing clothes or taking part in activities that might not be considered traditional within their particular culture, or wanting to leave an arranged marriage or forced marriage.

### **Domestic Abuse**

Domestic abuse is defined as an incident or pattern of incidents of controlling, coercive or threatening behaviours, violence or abuse by someone who is or has been an intimate partner or family member regardless of gender or sexuality. It includes 'honour' based violence, emotional, sexual, financial, psychological and physical abuse.

## Stalking

Stalking can be defined as a pattern of repeated unwanted behaviour that causes an individual to feel distressed, scared, and / or fear violence. It differs from harassment, in that the perpetrator will be obsessed with, or fixated on, the individual they are targeting. Such as repeatedly damaging property, watching or spying including tracking devices, contacting workplaces, colleagues, friends close to the victim, online monitoring, blackmail, making threats to hurt those close to the victim, including their children, repeatedly sending unwanted letters or gifts and sexual and physical assault.

## Hate Crime

Hate crime or incidents means any incident that is perceived by the victim, or any other person to be racist, homophobic, or due to a person's religion, beliefs, gender identity or disability. Anyone can be a victim of hate crime or incidents regardless of race, age, disability, sexuality or gender. Lesbian, gay, bisexual and transgender (LGBT) individuals could face additional concerns around homophobia and gender discrimination. Individuals may be concerned that they will not be taken seriously or recognised as a victim. Abusers may also control their victims by threatening to 'out' them to friends and family or support services.

## Cyber Abuse / Sexting

Cyber bullying is facilitated through electronic technology which includes devices and equipment such as cell phones, computers and tablets. Communication tools are also utilised such as social media sites, chat and websites. Examples of cyber bullying are rumours sent via e-mail or posted on social networking sites and embarrassing pictures, videos, and fake profiles.

Children, young persons and adults who are being bullied in this way have difficulty removing themselves from this behaviour as cyber bullying can take place 24 hours a day, 7 days a week and can reach a person when he or she is alone. Messages and images can be posted anonymously and distributed quickly to a very wide audience. It can be difficult or in some cases, impossible to trace the source. It is also extremely difficult to delete inappropriate or harassing messages, texts or pictures once they have been posted or sent.

## Gangs

A gang is defined as a relatively durable group who have collective identity and meet frequently. They are predominately street-based groups of young people who see themselves (and are seen by others) as discernible groups, engaging in criminal activity and violence which can be integral to the group's activity laying claim over territory (this is not just geographical territory but also includes illegal economy) and in conflict with other similar gangs.

The risk posed to young people involved in gangs are being exposed to violence, weapons, drugs and sexual exploitation.

Evidence suggests that gangs are predominately male with an average age of 20 years. They have extensive criminal histories with the average age of the first conviction being at 15 years old. However, there is a reported increase in female members in gangs. There is often pressure for girls to associate with young boys in gangs to 'link' with gang members to attain status for their own protection and perhaps benefit from a criminal lifestyle. Sexual exploitation and abuse is a risk for girls. For example, rape by gang members as a form of retaliation or as an act of violence is said to occur quite frequently in some areas and reports to police are rare due to fear of intimidation.

## Bullying

Whilst there is no legal definition of bullying it is often described as repeated behaviour which is intended to hurt someone either emotionally or physically and is often aimed at certain people because of their race, religion, gender or sexual orientation or any other aspect such as appearance or disability. It can happen anywhere, including school, university and in the workplace. Bullying can take many forms including, name calling, damaging belongings, making things up to get someone into trouble, threats, intimidation, stealing money, posting insulting messages, or rumours on the internet etc.

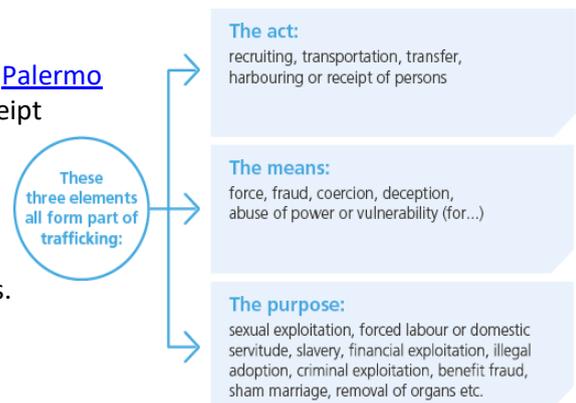
## Mate Crime

This term is understood to refer to the befriending of people who are perceived by perpetrators to be vulnerable, for the purpose of taking advantage of, exploiting and / or abusing them. The relationship is likely to be of some duration and, if left unchecked, may lead to a pattern of repeat and worsening abuse. Mate crimes are likely to happen in private, often in the victim's homes.

It can also occur via social media, where victims are financially or sexually exploited after being befriended online. Whilst this crime can affect many people, individuals with learning disabilities, mental health, older people and those with substance abuse issues are all at greater risk.

## MODERN SLAVERY

What is Human Trafficking? The UN defined human trafficking in the [Palermo Protocol](#) as the 'recruitment, transportation, transfer, harboring or receipt of persons by means of threat, or use of force, coercion or deception. To achieve the consent of a person having control over another person, for the purpose of exploitation'. According to this definition, trafficking includes sexual exploitation, forced and bonded labor, domestic servitude, any form of slavery and removal of organs. <https://www.humantraffickingfoundation.org/theissue>



*All 3 components must be present for an adult to be considered trafficked. However, as regards children, the 'means' component is not required as they are not able to give consent.*

The Home Office has described modern slavery as *"a serious and brutal crime in which people are treated as commodities and exploited for criminal gain. The true extent of modern slavery in the UK, and indeed globally, is unknown"*.

The Modern Slavery Act 2015 encompasses human trafficking as well as slavery, servitude and forced or compulsory labor.

*"Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment."* HM Government.

We recognise that the beauty sector is at risk of becoming involved in modern slavery, however this is still a rare occurrence. Our provision is funded through Advanced Learner Loans, which has strict residency criteria and stringent eligibility checks via the Student Loan Company. This is low risk for Any Driver; however, we will ensure staff are trained to identify any potential issues relating the modern slavery, either directly with a Learner or colleagues at their workplace.

## E-SAFETY – KEEPING SAFE ON-LINE

Any Driver Ltd seeks to promote responsible use of technology for the purposes of training and development of staff, delivering services, employer engagement, and to encourage learners and customers to use digital communication responsibly. This policy encompasses the use of the internet, email, electronic communication and mobile devices.

While this is critical to the improvement of IT skills, it also requires that we educate learners and staff about the associated benefits and risks of using technology to enable them to control their online experiences.

Any Driver Ltd is committed to:

- Ensuring security measures are strong and reliable – measures include enhanced internet filtering and firewalls to protect, servers and workstations and accidental or malicious access of systems or information
- Managing risks – by conducting risk assessment on the use of any new technologies and external online platforms
- Promoting safe and appropriate user behaviour – Any Driver Ltd will not tolerate abuse of IT systems. Incidents of bullying, harassment or unacceptable conduct will be treated seriously. Where conduct is found to be unacceptable, Any Driver Ltd will deal with the matter internally. Where it is considered illegal, the matter will be reported to the police
- Ensuring storage of information is secure and meets all legal requirements – customer and staff information is stored in line with our Data Protection Policy. Any Driver staff will keep personal information safe and secure at all times, and only share this information with consent of the information owner or in line with the above policy (see ADSO002 Data Protection Policy)
- Educating staff and learners in e-safety – we will support and educate our staff and learners to ensure they are able to recognise the risks and make informed judgements
- **Effectively managing any incidents which threaten e-safety** – through information security monitoring and clear reporting and investigating processes (see ADSO002 Data Protection Policy)
- We recognise that the COVID-19 lockdown and other restrictions have meant an increased dependency on on-line communication and teaching methods and with this come a heightened safeguarding risk, including grooming, gambling and fraud. We have further enhanced the training for learners to make them aware of the increased risk for all

### Definitions

E-safety describes the process of limiting the risks to children, young people and vulnerable adults when using internet, digital and mobile technology.

Risks include:

**Content:** exposure to age-inappropriate material, inaccurate or misleading information, or socially unacceptable material, such as that inciting violence, sexual violence, hate or intolerance; illegal material, such as images of child abuse

**Contact:** grooming using communication technologies, bullying via websites, mobile phones or other forms of communication device

**Commerce:** exposure to inappropriate commercial advertising, online gambling services or commercial and financial scams

### Staying Safe

It is impossible to be completely safe while using electronic communication, particularly the internet. Any Driver staff, customers and learners may reduce the risks by following the steps below.

## Search Engines

Search engines enable the rapid search of the Internet for information including text, images, video or audio content. Searching typically involves entering a word or words into a search box and clicking the search button to produce a list of relevant websites. The more accurate your search e.g. using a full phrase in “\_” rather than singular words, the more relevant the search results will be and less likely that unwanted results will be returned. For example, if you are searching for information on the planet Mars, entering ‘planet mars’ as the search criteria will return more relevant results than just entering ‘Mars’.

Take care to spell correctly when typing in a search. Even a small typing error can return unwanted results.

Remember that not all the information held on websites is reliable. Do not take any information on face value. For better assurance, you should try to ensure that you have visited a genuine authority for what you are searching. You can try to establish this by checking domain names in the address bar carefully with every page that you visit, you can also hover over links with the mouse pointer to check at the bottom of the browser the domain you will be visiting i.e. gov.uk domain in <https://www.gov.uk/browse/driving>

It is important to identify when search results are sponsored rather than normal search results. Sponsored results are “paid for advertising” so may not always provide relevant or accurate information. Even malicious content can be delivered for a short time though paid advertising before it is found which are normally the first few results in a search. You should always also hover over these links to check the domain before visiting as the title of an advert can be used to present a misleading website address. Google search engine now denotes adverts with an “Ad” logo prefix.

## Social Networking Sites

Social networking sites (like Facebook, LinkedIn) are online ‘communities’ of internet users to share information. Members of the community create an online ‘profile’ to share their personal information. It is important that users look after their personal information properly to minimise the risk of cyber bullying, invasion of privacy, identity theft, grooming etc.

When using social networking sites:

- Don’t publish personal information like location, email address, phone number or date of birth
- Be very careful about what images and messages are posted, even among trusted friends – once they are online, they can be shared widely and are extremely difficult to remove
- Keep a record of anything abusive or offensive received and report any trouble to the site management (most sites have a simple reporting procedure, normally activated by clicking on a link on the page)
- Be aware that publishing or sharing anything which would mean breaking a copyright agreement is illegal
- If you make an online friend and want to meet up with them in real life, take safety precautions such as going with a group of people, making sure friends and family know where you are, only meeting in a public place etc.
- consider creating separate ‘professional’ and ‘personal’ profiles with different security settings to ensure your personal profile is private
- Think before posting any photos of yourself (or comments) - ask yourself if you would be comfortable with colleagues, managers or customers seeing them. Never upload photos in response to a request from someone you do not know and trust

When using X (previously known as Twitter):

- Check who is following you regularly and block anyone you do not wish to see your "tweets"
- Set your privacy settings to limit who sees your updates
- Change your username so it is not your actual name
- Check the settings to control what others can find out about you
- Consider using a graphic or an icon rather than a photo of yourself in your profile. If you do use a photo, make sure it is not rude, suggestive or would otherwise attract inappropriate contact.

## Email

- Do not forward chain letters to anyone else, just delete them
- Do not impersonate anyone else using e-mail
- Do not use e-mail to send comments or information that is defamatory or libelous, or use e-mail as a means of harassment, intimidation, annoyance or bullying to anyone else. Only send messages that you would be happy to receive
- Do not reply to pestering, offensive or suggestive e-mails, but report them to a line manager or adviser/Assessor
- Never give bank details or financial information in an email
- Never open or forward an email from an untrusted source
- Never click on pop-ups or click here buttons from an untrusted source
- Never respond to emails asking for money

## Cyberbullying

Cyberbullying is when someone bullies' others over the internet using social media or on a mobile phone by sending abusive emails or texts directly or by posting nasty comments or humiliating images for others to see.

Grooming and radicalisation can also take place using the internet's social media sites so please be vigilant when people are trying to befriend you, especially when they are asking to meet you or trying to encourage you to adopt beliefs or persuade you to join groups.

If you are worried or have any questions or concerns regarding this, then you should speak to your Assessor and/or Any Driver's safeguarding officer.

## Other Safeguarding issues:

- **Child Pornography and the Internet:** Protection against online exploitation.
- **Forced Marriage of a child or adult:** Recognition and prevention of forced marriages.
- **Young Carers:** Support for children who care for others.
- **Looked After Children:** Safeguarding children living away from home.
- **Care Leavers:** At risk of homelessness leading to vulnerability relating to County Lines, gangs, criminality and addiction.
- **Pregnancy of a Child:** Support and guidance for pregnant minors.

## GUIDANCE

### Good Practice

- Always work in an open environment avoiding private or unobserved situations, encourage open communication
- Treat all children and vulnerable adults equally with respect and dignity
- Maintain a safe and appropriate distance
- Be aware of the effect your words or actions may have

### Practices to be avoided

- Spending excessive amounts of time alone with children and vulnerable adults away from others
- Straying from the specified task or assignment
- Being unnecessarily inquisitive
- Saying anything that may make a child or vulnerable adult feel uncomfortable, or that could be interpreted as aggressive, hostile or impatient
- Being drawn into personal conversations
- Sitting or standing too close
- Meeting other than at the prearranged venue
- Exchanging personal details
- Making contact via social internet contact sites

### Practices never to be sanctioned

You should never:

- Allow allegations made by a child or vulnerable adult to go unchallenged, unrecorded or not acted upon
- Promise a child or vulnerable adult that their confidences will be kept secret
- Allow children or vulnerable adults to use inappropriate language unchallenged
- Reduce a child or vulnerable adult to tears as a form of control
- Allow or engage in any form of touching or make suggestive comments to a child or vulnerable adult

## ALLEGATIONS AGAINST STAFF, FREELANCERS AND CONTRACTORS

In the unlikely event that an allegation is made against a member of staff, freelancer or contractor, including tutors, trainers and assessors the following procedure must be followed:

- A learner that wishes to make a complaint that includes an allegation relating to safeguarding about a member of staff, freelancer or contractor is requested to contact **Jessica Evans - the Designated Safeguarding Officer**. However, should this not be possible they should speak to the training centre manager, unless the allegation is about them, in which case the learner should contact the Managing Director. In the first instance the learner should take steps to remove themselves from harm
- The DSO will carry out an investigation and that start with speaking with the learner to establish the detail about their complaint/allegation and may include a formal investigation interview with the member of staff, freelancer or contractor, other members of staff, freelancer and contractors and other learners
- All such investigations will be treated as urgent and high priority, the person whom the allegation has been about may be suspended on full pay (employees only) during the investigation and if they are freelance or contractors will be stood down until the investigation outcome has been reached
- Any member of staff, freelancer or contractor that is found to have committed an offence will no longer be permitted to work for/with Any Driver Ltd.
- In the event that a safeguarding incident/offence has occurred, the DSO will report it to the local authority and the ESFA

## RESPONSIBILITY FOR THE IMPLEMENTATION OF THE POLICY

We believe that it is everyone's responsibility to remain vigilant and to ensure that children and vulnerable adults are provided with a safe and secure environment.

Staff dealing with children and vulnerable adults will be trained in how to recognise and respond to a situation where abuse is reported and how to report this or any concerns. They should try to consider and act on 5 R's:

1. Recognition
2. Response
3. Reporting
4. Recording
5. Referral

**Recognition** - signs and indicators of abuse may just cause concern, but it could be a direct disclosure from someone. A direct disclosure may be made to anyone within the organisation who is trusted by the individual.

**Response** – Appropriate response is vital. No report should ever be ignored. At this point the response is just to listen, stay calm, and not show shock or outrage at what is being disclosed. You may need to ask some questions, but these should never lead or probe, just gather enough information to ascertain if there is immediate danger or harm. Do not make any promises as to what will happen and be clear that everything will be treated with confidence but must be passed on to the appropriate DSO.

**Reporting** – Immediately report your concerns or information to the DSO. Once the report has been made, the responsibility will lie with the DSO. You are within your rights to check that appropriate action has been taken, but confidentiality may mean that the DSO may not be able to share this information with you. If for any reason you feel that the matter has not been taken forward, you can make a referral directly to the Independent Safeguarding Authority.

**Recording** – You should record precisely what has been alleged, using the key words and phrases used by the individual. You can also record your own observations of the individual, as well as your interpretation of the facts. This record should be passed on in person to the DSO, who will store it securely, where it is only accessible to those staff with safeguarding responsibilities.

**Referral** - The DSO should gather enough information to make a referral, if appropriate by talking to the appropriate people outside the organisation.

**Whistle blowing** - People are encouraged to speak up about any concerns they may have. They will be protected by the Company's whistle blowing policy, provided that it is made in good faith.

## ROLES AND RESPONSIBILITIES

Roles and responsibilities are as follows:

**Managing Director / Designated Safeguarding Lead – Neil Evans** - [neil@anydriver.co.uk](mailto:neil@anydriver.co.uk) / 07827 228558

- Allocate required resources and time to provide adequate safeguarding measures, including the appointment of a Designated Safeguarding Officer
- Provide leadership in ensuring the safety of children and vulnerable adults
- Review and approve policy annually
- Review systems and procedures

- Put in place a comprehensive training programme to ensure all staff have a competent understanding of safeguarding that is relevant to their role
- Ensure all staff have been thoroughly vetted prior to undertaking duties
- Review and update safeguarding procedures

**Designated Safeguarding Officer – Jessica Evans – [jess@anydriverer.co.uk](mailto:jess@anydriverer.co.uk) / 07379 077954**

- Manage the application of safeguarding procedures in the centre
- Act as the focal point for safeguarding in the centre
- Ensure all staff are competent to undertake their safeguarding duties
- Clearly communicate the safeguarding policy to all staff
- Liaise with partner agencies as required, including Local Safeguarding Children Board (LSCB)
- Inform relevant agencies of concerns over safeguarding issues related to learners and staff

#### **Employees / self-employed trainers (contractors)**

- Ensure that all staff are aware of any children and vulnerable adults within their group or caseload
- Comply with policy and procedures
- Promote a safe learning environment
- Ensure all learners and employers are aware of the safeguarding policy
- Report any concerns to DSO immediately

#### **TRAINING**

- All new staff will need to undertake the ETF Safeguarding training & assessment as a minimum; certificates must be retained on file by the DSO
- All staff will undertake an annual update using the revised ETF course materials as a minimum, records must be maintained by the DSO along with the updated certificates
- Any Driver Ltd will provide staff with other update training, including access to local and relevant case studies
- Any Driver Ltd will provide training for assessor to enable them to deliver high quality safeguarding training to their learners
- Staff will keep a record of their CPD affecting safeguarding issues (refer to ADSO009 CPD Policy)

#### **SUPPORT TO STAFF**

It is recognised that some disclosures might be upsetting and harrowing for some staff. Any Driver Ltd will offer appropriate support and assistance as necessary to staff involved with safeguarding issues.

#### **RELATED SUBJECTS AND POLICY**

Safeguarding has a broad meaning, it covers the protection of children and vulnerable adults and incorporates County Lines. There are close linkages to The Prevent Duty, British Values and Equality, Diversity and Inclusion (EDI). At Any Drive we take our responsibilities seriously; we train all staff, freelancers and contractors, and include all topics within our curriculum. Further details can be found in the following policies:

- ADP001 Appeals and Complaint Policy and Procedure
- ADP005 Equality, Diversity & Inclusion Policy Including Harassment & Bullying and British Values
- ADP006 Prevent Duty and County Lines Policy
- ADP011 Whistle Blowing Policy

## RESPONSIBILITY FOR MONITORING THIS POLICY

Monitoring of this policy is by the **Designated Safeguarding Lead - Neil Evans**. He will share best practice and report to the Governance Board. This policy will be reviewed annually. Any changes will be communicated to all learners and employees.

Document Ref.	Title	Version	Date	Reviewer	Next Review Date
	Safeguarding Children and Vulnerable Adults Policy	2	2019	D Gardiner MBE	January 2020
ADP003	Safeguarding Policy	3	January 2020	D Gardiner MBE	January 2021
		4	February 2020	D Gardiner MBE	February 2021
		5	October 2020	D Gardiner MBE	October 2021
		6	April 2021	D Gardiner MBE	April 2022
		7	January 2023	D Gardiner MBE	January 2024
		8	January 2024	D Gardiner MBE	January 2025
		9	February 2025	D Gardiner MBE	February 2026

**Policy Approved by:** Neil Evans

**Signature:** N Evans