



SAFEGUARDING CHILDREN, YOUNG PERSONS AND VULNERABLE ADULTS PROTECTION POLICY

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1 Policy Statement

This policy is informed by statutory safeguarding legislation and current government and local authority guidance, including the [Children Act 2004](#), [Working Together to Safeguard Children](#), [Keeping Children Safe in Education](#), and relevant [safeguarding partnership procedures](#).

We at GLOBAL believe that every person within the organisation has a crucial role to play in protecting all the children, young people and vulnerable adults in their care. This will be achieved by adhering to the above listed legislation, guidance, and procedures.

GLOBAL strives towards providing a preventative curriculum and ethos which ensures children, young people and vulnerable adults develop a healthy awareness about keeping themselves safe, whilst working with a range of agencies in order to carry this out effectively.

We aim to recognise children, young people and vulnerable adults who are or are likely to suffer significant harm without intervention. Therefore, we strive to adopt a positive relationship with all services

Workers are expected to recognise a wide range of factors which may indicate a child, young person or vulnerable adult at risk. Safeguarding issues will be dealt with sensitively and effectively through good working relationships with parent and carers.

Workers will adopt an open and honest culture where children, young people and vulnerable adults feel they can communicate with them about concerns they have. Through this worker will be able to seek advice and guidance from other services.

1.1 Aim

GLOBAL recognises the importance of ensuring the protection of children, young people and vulnerable adults that are employees of the company or, those who participate in activities organised by the company.

1.2 Overview

GLOBAL will:

- Respect and promote the rights, wishes and feelings of children, young people and vulnerable adults.

- Promote and implement appropriate procedures to safeguard the well-being of children, young people and vulnerable adults and protect them from abuse.
- Recruit, train, support and supervise its staff to adopt best practice to safeguard and protect children, young people and vulnerable adults from abuse and to minimise risk to themselves.
- Require members to adopt and abide by this Child, young person and Vulnerable Adult Protection Policy and these Procedures.
- Respond to any allegations of misconduct or abuse of children, young person or vulnerable adults in line with this Policy and these Procedures as well as implementing, where appropriate, the relevant disciplinary and appeals procedures.
- Review and evaluate this Policy and these Procedures on a regular basis

1.3 Principles

The welfare of children, young people and vulnerable adults is everyone's responsibility, particularly when it comes to protecting them from abuse. This Policy and these Procedures are based on the following principles:

- The welfare of children, young people and vulnerable adults is the primary concern.
- All children, young people and vulnerable adults, whatever their age, culture, disability, gender, language, racial origin, socio-economic status, religious belief and/or sexual identity have the right to protection from abuse.
- It is everyone's responsibility to report any concerns about abuse and the responsibility of the Local Authority Children's Social Care to conduct, where appropriate, a joint investigation.
- All incidents of alleged poor practice, misconduct and abuse will be taken seriously and responded to swiftly and appropriately.
- All personal data will be processed in accordance with the requirements of the Data Protection Act 2018 and UK GDPR.

1.4 Review

This Policy and these Procedures will be regularly monitored and Reviewed by GLOBAL's *Quality Assurance Manager*, Ben Levy:

- In accordance with changes in legislation and guidance on the protection of children, young people and vulnerable adults or any changes within GLOBAL.
- Follow any issues or concerns that have been raised about the protection of children or vulnerable adults within GLOBAL.
- In all other circumstances, at least annually.

2 Procedure

GLOBAL Child and Vulnerable Adult Protection Procedures

2.1 Recruitment and Employment

All reasonable steps must be taken to ensure unsuitable people are prevented from working with children, young people and vulnerable adults.
For all positions that require regular contact with children or vulnerable adults the following recruitment procedures must be completed.

2.2 Advertising

All forms of advertising used to recruit members for positions involving regular contact with children or vulnerable adults will include the following:

- The aims of **GLOBAL** and, where appropriate, details of the programme involved.
- The responsibilities of the role.
- The level of experience or qualifications required (e.g. experience of working with children is an advantage).
- Details of **GLOBAL**'s open and positive stance on child and vulnerable adult protection.

2.3 Pre-application Information

Pre-application information for positions involving regular contact with children or vulnerable adults will be sent to applicants and will include:

- A job description including roles and responsibilities.
- A candidate specification (e.g. stating qualifications or experience of working with children or vulnerable adults required).
- Information on **GLOBAL** and related topics.

2.3 References

References will be sought as required. Where possible at least one of these references will be from an employer or a voluntary organisation where the position required working with children or vulnerable adults in any of the following capacities: employee; volunteer; or work experience. If the person has no experience of working with children or vulnerable adults, specific training requirements will be agreed before appointment.

2.4 Checks

GLOBAL U Check to complete all DBS prior to any staff appointment.

This will require the prospective position holder to complete and submit a Disclosure form, with the results returning to HR and the Designated Safeguarding Lead.

The following types of checks are to be requested for positions requiring contact with children, young people and vulnerable adults:

Standard Disclosure

Standard disclosures will be requested from those applying for positions listed in the Rehabilitation of Offenders Act 1974 (ROA) (Exceptions) Order 1975. These categories include occupations with duties that involve regular contact with children and young people under the age of 18; and the elderly, sick and disabled people.

Enhanced Disclosure

Enhanced Disclosures will be requested for positions that involve a greater degree of contact with children or vulnerable adults. For example, positions that requires regular contact with, training, supervising or being in sole charge of children and young people.

2.5 Interview

For positions that require regular contact with children or vulnerable adults, interviews will be carried out. An interview will include requests for additional information to support the application.

2.6 Offer of Position

Once a decision has been made to appoint an individual, an offer letter will be presented to the applicant including the details of the position, any special requirements and the obligations e.g. agreement to the policies and procedures of the organisation, the probation period and responsibilities of the role. Confirmation of the position being accepted will require the offer letter to be formally accepted and agreed to in writing e.g. by the individual signing and dating their agreement on the offer letter and returning it to the organisation.

2.7 Induction

The induction process for the newly appointed member will include the following:

- An assessment of training, individual aids and any other needs and aspirations.
- Clarification, agreement and signing up to the Child and Vulnerable Adult Protection Policy and Procedures.
- Clarification of the expectations, roles and responsibilities of the position.

2.8 Probation

Newly appointed members will complete an agreed period of probation on commencement of their role.

2.9 Monitoring and Performance Appraisal

All members who have contact with children, young people or vulnerable adults will be monitored and their performance appraised. This will provide an

opportunity to evaluate progress, set new goals, identify training needs and address any concerns of poor practice. The first review will be undertaken after a 3-month period and then again at the end of the 6-month probationary period. This may be earlier if areas of development are highlighted before 3 months.

3. Scope - Responsibility

3.1 The Designated Safeguarding Leads (**Leila Magee** and **Ben Levy**) will have the main responsibility for managing child, young persons and vulnerable adult protection issues within GLOBAL. The Designated Safeguarding Leads are responsible for sharing appropriate information within the organisation about serious case reviews, new legislation, changes in Local Authority procedures and promoting best practice.

In the absence of both DSLs, safeguarding responsibilities transfer to the Deputy DSLs.

The responsibilities of the Designated Safeguarding Leads are detailed below:

3.2 Within GLOBAL the Designated Safeguarding Leads will:

- Implement and promote GLOBAL's Child, Young Person and Vulnerable Adult Protection Policy and Procedures.
- Regularly report to the Board/Management as applicable
- Act as the main contact within GLOBAL for the protection of children, young people and vulnerable adults.
- Provide information and advice on the protection of children and vulnerable adults.
- Support and raise awareness of the protection of children, young people and vulnerable adults.
- Communicate with staff on issues of child and vulnerable adult protection.
- Keep abreast of developments and understand the latest information on data protection, confidentiality and other legal issues that impact on the protection of children, young people and vulnerable adults.
- Encourage good practice and support of procedures to protect children, young people and vulnerable adults.

- Establish and maintain contact with local statutory agencies including Local Authority Children's Services and the Local Authority Designated Officer.
- Maintain confidential records of reported cases and action taken and liaise with the statutory agencies and ensure they have access to all necessary information.
- Organise training for staff.
- Regularly monitor and review GLOBAL's Child and Vulnerable Adult Protection Policy and Procedures.
- Share appropriate information within the organisation about serious case reviews, new legislation, changes in Salford's procedures and promoting best practice.

The Designated Safeguarding Lead should:

- Understand the issues affecting children, young people and vulnerable adults and the sensitive way in which they must be managed.
- Be able to communicate the implications of protecting children, young people and vulnerable adults to all members.
- Be able to communicate with children, young people and vulnerable adults.
- Be supportive of the introduction of Child and Vulnerable Adult Protection Policy.
- Have an understanding and appreciation of the need to respect confidentiality.
- Be able to follow procedures and recognise when to seek advice and not rely solely on their own judgement.
- Be willing to challenge members who do not comply with the Child and Vulnerable Adult Protection Policy and Procedures.
- Communicate new legislations to staff and employees and or any changes in procedures across Liverpool and greater Manchester by email and update in weekly staff meetings.

4. Code of Conduct for the Protection of Children, young people and vulnerable adults

This code of conduct details the types of practice required by all staff of **GLOBAL** when in contact with children, young people or vulnerable adults. The types of practice are categorised into good practice; practice to be avoided and practice never to be sanctioned. Suspicions or allegations of non-compliance of the Code by a member will be dealt with through the **GLOBAL's** Disciplinary Procedure for misconduct.

4.1 Good Practices

GLOBAL supports and requires the following good practice by staff when in contact with children, young people and vulnerable adults.

When working with children, young people or vulnerable adults, **GLOBAL** will:

- Make time at the GLOBAL enjoyable.
- Always work in an open environment e.g. avoid private or unobserved situations and encourage an open environment for activities.
- Treat all children, young people and vulnerable adults equally, with respect and dignity.
- Put the welfare of each child or vulnerable adult first before winning or achieving performance goals.
- Be an excellent role model including not smoking or drinking alcohol in the company of children or vulnerable adults.
- Give enthusiastic and constructive feedback rather than negative criticism.
- Ensure that if any form of manual or physical support is required for a child or vulnerable adult, it is provided openly, the child or vulnerable adult is informed of what is being done and their consent is obtained.
- Deliver educational instruction first verbally; secondly role-modelled; and thirdly, and only if necessary, with hands on - which must be accompanied by telling the child or vulnerable adult where you are putting your hands and why it is necessary and obtaining their consent.
- Involve parents, guardians and carers wherever possible. This can be using books which are used to record accidents outside of the training environment

- Build balanced relationships based on mutual trust that empower children, young people and vulnerable adults to share in the decision-making process.
- Recognise the developmental needs and capacity of children, young people and vulnerable adults and avoid excessive training or competition and either pushing them against their will or putting undue pressure on them.

4.1.1 First Aid and Treatment of Injuries:

If, in your capacity as a member of **GLOBAL**, a child or vulnerable adult requires first aid or any form of medical attention whilst in your care, then the following good practice must be followed:

(Health and Safety policy regarding accidents)

4.1.2 Good practice when taking and transporting children, young people or vulnerable adults:

- If it is necessary to provide transport or take children, young people or vulnerable adults away the following good practice must be followed:
- Where practicable request written consent if staff are required to transport children, young people or vulnerable adults.
- Always tell another staff that you are transporting a child, young person or vulnerable adult, give details of the route and the anticipated length of the journey.
- Ensure all vehicles have the correct MOT, insurance and car tax and driver's licences are valid.
- All reasonable safety measures are taken, e.g. seatbelts are worn, and child seats are available where appropriate.
- Ensure, where possible, a male and female accompany mixed groups of children, young people or vulnerable adults. These adults should be familiar with and agree to abide by **GLOBAL's** Child and Vulnerable Adult Protection Policy and Procedures.
- Always plan and prepare a detailed programme of activities and ensure copies are available for other staff and parents/guardians.

4.2 Professional Boundaries and Conduct Standards

- The following practices must be carefully observed by all staff in their role within GLOBAL to ensure the safety, wellbeing, and dignity of learners at all times:
- Staff are required to act in a fair, consistent, and professional manner, ensuring that all children and young people are treated with equal respect and dignity. Care and support must be provided impartially and in line with individual needs, while always maintaining appropriate professional boundaries.
- One-to-one working with children, young people, or vulnerable adults should only take place where it is required as part of an agreed learning or support activity. Where this occurs, staff must ensure that sessions are conducted in a transparent and professional manner, with doors kept open or visibility maintained, and in line with safeguarding and professional conduct expectations.
- Staff are prohibited from engaging in social or personal contact with children, young people, or vulnerable adults outside of an agreed educational context. This includes meeting learners in private homes, inviting learners into staff homes, or caring for learners in any home environment. Maintaining clear professional boundaries is essential to safeguarding learners and protecting staff from risk.
- Staff are not permitted to provide personal or intimate care for learners. Any exception must be formally agreed, risk assessed, and carried out only by appropriately trained staff, with another trusted adult present. Personal care must never be provided based solely on perceived consent. Professional boundaries must be maintained at all times.

Important Note:

It may sometimes be necessary for members to do things of a personal nature for children, young persons or vulnerable adults, particularly if they are very young or vulnerable. These tasks should only be carried out with the full understanding and consent of the child, young person or vulnerable adult and where appropriate their parents/guardians. It is important to respect their views. If a person is fully dependent on you, talk with him/her about what you are doing and give choices where possible, where there is physical contact, lifting or assisting a child, young person or vulnerable adult to carry out activities. Do not take on the responsibility for tasks for which you are not appropriately trained.

4.3 Strictly Prohibited Conduct

- The following practices are strictly prohibited for all staff in their role within GLOBAL and must never occur under any circumstances:
- Any form of sexually inappropriate behaviour towards learners is strictly prohibited and unlawful. This includes sexualised language, actions, contact, or interactions of any kind. Breaches will be treated as a serious safeguarding matter and managed accordingly.
- Unnecessary or inappropriate physical contact is not permitted. Any essential contact must be proportionate, transparent, and solely related to learning or safety, with professional boundaries maintained at all times.
- Staff must always maintain strictly professional relationships with learners. Intimate emotional, sexual, or physical relationships are abusive, unlawful, and will not be tolerated.
- Any sexualised, inappropriate, or sexually suggestive physical contact with a child, young person, or vulnerable adult is strictly prohibited and constitutes abuse. This behaviour is illegal and incompatible with the professional responsibilities of staff working in education and training.
- Inappropriate or sexualised language must not be ignored. Staff should respond appropriately and recognise that age-inappropriate sexualised language may indicate safeguarding concerns and must be reported in line with safeguarding procedures.
- Any sexualised or sexually suggestive language directed towards a child, young person, or vulnerable adult is strictly prohibited and constitutes abuse. This behaviour is illegal and incompatible with the professional role and responsibilities of staff working in education and training.
- Causing emotional distress or harm to a learner as a means of control is abusive, unlawful, and will not be tolerated.
- All disclosures, concerns, or allegations raised by children, young people, or vulnerable adults must be taken seriously, listened to appropriately, and responded to in line with safeguarding procedures. Staff must not investigate, challenge, or attempt to resolve allegations themselves. All concerns must be recorded accurately and reported promptly to the Designated Safeguarding Lead (DSL) or in accordance with safeguarding policy.
- Staff are not permitted to share a bedroom or sleeping space with children, young people, or vulnerable adults. During residential visits, all sleeping

arrangements must be subject to risk assessment and safeguarding planning, with staff rooms located separately from learner accommodation wherever possible. Any exceptions must be formally authorised and managed in accordance with safeguarding procedures and professional boundaries.

- Staff must maintain clear professional boundaries with children, young people, and vulnerable adults always. Inviting or allowing learners to stay in a staff member's home is not permitted, as it represents an inappropriate blurring of professional relationships and poses safeguarding risks to both learners and staff.

4.4 Concerns, Disclosure and Reporting

If staff have concerns about an incident involving a child, young person or vulnerable adult that seems untoward or unusual they must report their concerns as soon as possible to either the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead who, if required, will assist you to create a record of the incident using one of the forms found in Appendix G of this Policy. Parents should also be informed of the incident as soon as possible unless it is not in the child's, young persons or vulnerable adult's interests to tell them (Separate Section - Sharing Concerns with Parents, Guardians or Carers).

Report, record and inform if the following occur:

- If you accidentally hurt a child, young person or vulnerable adult.
- If a child, young person or vulnerable adult seems distressed in any manner.
- If a child, young person or vulnerable adult misunderstands or misinterprets something you have said or done.
- If a child, young person or vulnerable adult appears to be sexually aroused by your actions.
- If a child, young person or vulnerable adult needs to be restrained.

5 Identifying and Managing Bullying

The lives of many people are made miserable by bullying. Victims of bullying can feel lonely, isolated and deeply unhappy. It can have a devastating effect on a child, young person or vulnerable adult's self-esteem and destroy their self-confidence and concentration.

They may become withdrawn and insecure, more cautious and less willing to take any sort of risk. They may feel it is somehow their fault or that there is something wrong with them and at worst cause depression and/or feelings of worthlessness that lead to suicide.

To ensure **GLOBAL** creates an atmosphere where bullying of children, young people and vulnerable adults is unacceptable and to help staff manage bullying issues, guidelines for identifying and managing bullying have been developed.

Any suspicions or allegations of bullying of a child, young person or vulnerable adult against a member will be dealt with through the GLOBAL's Bullying and Harassment and Disciplinary Procedures.

Where bullying or peer behaviour raises safeguarding concerns, this will be managed in line with **Section 8.5.1** (Child-on-Child Abuse) of this policy.

6 Photographing, Videoing and Filming of Children, young people and vulnerable adults

6.1 Concerns about Photographers, Video or Film Operators

The following is required for **GLOBAL** activities or events where children or vulnerable adults are participating:

Where appropriate consent from the parent/guardian for photographing, videoing and/or filming of a child, young person or vulnerable adult must be obtained prior to the event or activity.

Global complete consent forms with all Young People – to highlight what social media they agree to, if they have any safe, care or religious requirements with photo sharing, within a safe WhatsApp group, so that the YP choose the pictures they want by adding them to the group that they are happy to share, we have a strict policy for the photographed person to agree every picture used either in the students portfolio or on social media – students can straight away say no as CEO and admin are on the WhatsApp groups so can monitor everything.

Where possible anyone wishing to use photographic/film/video equipment at a venue must obtain the approval of the Designated Safeguarding Lead this includes the use of mobile phones and any other similar equipment.

An activity or event specific identification badge must always be provided to and clearly displayed by accredited photographers, film and video operators on the day of the activity or event.

No unsupervised access or one-to-one sessions are to be permitted unless this has been approved in advance by the organisation, and appropriate vetting has occurred.

GLOBAL reserves the right always to prohibit the use of photography, film or video at any event or activity with which it is associated.

The requirements above are publicly promoted to ensure all
People present at the event or activity understand the procedure
And are aware of whom to contact if concerned.

6.2 Recording of Meetings for Safeguarding Purposes

In line with Global Academy's commitment to safeguarding and promoting the welfare of all students and staff, any meeting will be recorded where a student or students are present, or where a student or students are being discussed. This measure ensures transparency, accountability, and the appropriate conduct of all participants. Recordings will be securely stored in accordance with data protection legislation and Global Academy's data retention policies. Access to recordings will be strictly limited to authorised personnel and only permitted when necessary for safeguarding reviews, investigations, or compliance purposes.

6.3 Use of CCTV for Safeguarding and Security

To support the safeguarding of students, staff, and visitors, **Global** operates closed-circuit television (CCTV) systems throughout the premises. CCTV is used to deter inappropriate behaviour, monitor site security, and assist in the investigation of incidents. All footage is recorded and stored securely in accordance with data protection legislation and may only be accessed by authorised personnel when necessary for safeguarding or security purposes.

7 Children or Vulnerable Adults in Publications and on the Internet

The Internet and internal publications provide excellent opportunities to broadcast achievements of individuals to the world and to provide a showcase for the activities of **GLOBAL**. In some cases, however, displaying certain information about children, young people and vulnerable adults could place them at risk. The following procedure must be followed to ensure **GLOBAL** publications and **GLOBAL** information on the Internet do not place children, young people and vulnerable adults at risk.

GLOBAL publications and **GLOBAL** information on the Internet must adhere to the following:

- Publications or information on an Internet must never include personal information that could identify a child or vulnerable adult e.g. home address, e-mail address, telephone number of a child or vulnerable adult. Any contact information must be directed to the Designated Safeguarding Lead.
- Before publishing any information about a child, young person or vulnerable adult, written consent must be obtained from the child, young person or vulnerable adult's parent/guardian if appropriate. If the material is changed from the time of consent, the parents/guardians must be informed and consent provided for the changes.
- The content of photographs or videos must not depict a child or vulnerable adult in a provocative pose or in a state of partial undress. Children, young people and vulnerable adults must never be portrayed in a demeaning or tasteless manner.
- For photographs or videos of groups or teams of children or vulnerable adults ensure that only the group or team is referred to, not individual members. Credit for achievements by a child or vulnerable adult are to be restricted to first names e.g. Tracey was Player of the Year 2002.
- All published events involving children or vulnerable adults must be reviewed to ensure the information will not put children or vulnerable adults at risk. Any publications of specific meetings or child, young person or vulnerable adult events e.g. team coaching sessions, must not be distributed to any individuals other than to those directly concerned.
- Care must be taken in publishing photographs, film or videos of children or vulnerable adults who are considered particularly vulnerable e.g. the subject of a child or vulnerable adult protection issue or a custody dispute.
- Care is to be taken in publishing photographs, films or videos of children, young person or vulnerable adults with physical, learning and/or communication or language disabilities, as they could be particularly vulnerable to abuse.

Important Note: Any concerns or enquiries about publications or Internet information should be reported to the Designated Safeguarding Lead.

8 Responding to revealed /shared information from the Young Person

It is not the responsibility of anyone from GLOBAL to decide whether a child, young person or vulnerable adult has been abused. It is however everyone's responsibility to report concerns.

It is very important that GLOBAL staff understand what is meant by the term 'abuse'. The different types of abuse are:

- Emotional Abuse
- Neglect
- Physical Abuse
- Sexual Abuse
- Negative Discrimination (including racism)
 - Bullying (includes bullying by gangs; bullying by family members; Physical bullying; verbal bullying; teasing; and harassment)

The definitions for the types of abuse and signs that may suggest abuse are detailed in Appendix A. It is very important that this appendix is read and understood.

8.1 Responding to revealed /shared information from the Young Person

Working with young children demands a great deal of observational skill and alertness to situations which may indicate a child, young person or vulnerable adult is at risk. Recognising disclosures is paramount to the role of any professional.

Full revealing /sharing the individual may tell you clearly about the history of abuse and include names.

Partial revealing/sharing The individual may tell part of a story but may miss out important details like names.

Direct revealing/sharing The individual may tell you verbally or using signs what has happened

Indirect revealing/ sharing The individual may disclose abuse indirectly through play.

8.2 Information Sharing when working with other Organisations

We may need to share information with third parties where a young person has been referred by a partner agency, including to confirm a young person's attendance, completion and outcome feedback; or where we are required to

disclose someone's identity for regulatory and legal purposes. Personal data is only accessed by employees or other organisations that have a need to process your data for the purposes described in this notice.

We may also share your personal data

- When you have requested referral or contact with third parties to help coordinate support for you and/or to signpost you to services provided by other organisations;
- If we sell all or part of the company, we may disclose your personal data to the buyer for legal or regulatory and continuity purposes
- To third party agents, contractors, professional or legal advisors for the purposes of providing services to us. These third parties will be subject to confidentiality requirements, and they will only use your personal data as described in this privacy notice.
- Where required by law, to the police, regulatory bodies or legal advisors, for example if we are under a duty to disclose your personal data in order to comply with any legal obligation, establish, exercise or defend our legal rights.

Necessary and proportionate

When taking decisions about what information to share, we consider how much information we need to release. Not sharing more data than is necessary to be of use is a key element of the GDPR and Data Protection Act 2018, and we consider the impact of disclosing information on the information subject and any third parties. Information must be proportionate to the need and level of risk.

Relevant

Only information that is relevant to the purposes should be shared with those who need it. This allows others to do their job effectively and make informed decisions.

Adequate

Information should be adequate for its purpose. Information should be of the right quality to ensure that it can be understood and relied upon.

Accurate

Information should be accurate and up to date and should clearly distinguish between fact and opinion. If the information is historical then this should be explained.

Timely

Information should be shared in a timely fashion to reduce the risk of missed opportunities to offer support and protection to a child. Timeliness is key in emergency situations, and it may not be appropriate to seek consent for information sharing if it could cause delays and therefore place a child or young person at increased risk of harm. Practitioners should ensure that sufficient information is shared, as well as consider the urgency with which to share it.

Secure

Wherever possible, information should be shared in an appropriate, secure way. Employees must always follow Global's organisational policy on information security for handling personal information.

Record

Information sharing decisions should be recorded, whether or not the decision is taken to share. If the decision is to share, reasons should be cited including what information has been shared and with whom, in line with Global's organisational procedures. If the decision is not to share, it is good practice to record the reasons for this decision and discuss them with the requester. In line with Global's organisations own retention policy, the information should not be kept any longer than is necessary. In some rare circumstances, this may be indefinitely, but if this is the case, there should be a review process scheduled at regular intervals to ensure data is not retained where it is unnecessary to do so.

8.3 Revealing/sharing may come from a variety of sources.

The Individual - Follow protection procedure

The main carer

They may indicate to you that the child, young person or vulnerable adult is being abused and therefore the safeguarding procedure must be followed. However, it is always best to work in partnership with parents/carers. Therefore, parents/cares must be informed that it is your duty to follow the safeguarding procedure and seek their co-operation.

There may be some circumstances, which may lead you to believe the child, young person, or vulnerable adult is in immediate danger; in this instance you may follow the procedure without informing the carer of your actions.

Third party

This may be a relative friend or neighbour of the family. In this instance it is advisable to encourage that person to follow the child protection procedure and report any concerns they have to the appropriate authority. However, you may find it necessary to act on their behalf. Follow safeguarding procedure.

8.4 Responding to a Suspicion or Allegation of Inappropriate Behaviour or Misconduct

During the course of your role within GLOBAL a child, young person or vulnerable adult may disclose information to you about an employee or a non-member of GLOBAL that leads to a suspicion or allegation of inappropriate behaviour or misconduct. You must:

- Listen to the individual.
- Acknowledge the information received.
- Pass to the Designated Safeguarding Lead and if appropriate the parents/guardians/carers of the child, young person or vulnerable adult (Separate section - Sharing Concerns with Parents, Guardians or Carers).
- Make a full written record of the disclosure on the day you receive the disclosure.
- Sign and date the record then passes to the Designated Safeguarding Lead.

Establishing the Basic Facts

The Designated Safeguarding Lead must clarify the basic facts to establish whether there is reasonable cause to suspect or believe that misconduct has occurred. If the basic facts support a suspicion or allegation of misconduct by a member of staff, the matter will be dealt with in accordance with the Disciplinary Procedure and referred to appropriate external agency.

8.5 Responding to a Suspicion or Allegation of Abuse

All allegations of abuse must be taken seriously. Although false allegations of abuse do occur, they are less than usual. If a child, young person or vulnerable adult says or indicates that he/she is being abused or information is obtained which gives concern that a child, young person or vulnerable adult is being abused, you must react as soon as possible that day in line with the following procedures.

These Procedures aim to ensure that all suspicions and/or allegations of abuse against a member are taken seriously and are dealt with in a timely and appropriate manner. They must be read in conjunction with GLOBAL's Disciplinary Procedures.

Where there is uncertainty about whether the concern relates to abuse or misconduct, the Designated Safeguarding Lead must firstly be consulted for advice on the appropriate course of action. If the Designated Safeguarding Lead is unavailable, then the Local Authority Children's Services team (or Emergency Duty Team outside office hours) must be consulted for advice. This is important because they have an overview of safeguarding issues and they may well have other information that together causes concern.

Any information that raises concern about the behaviour of a member of staff towards a child, young person or vulnerable adult must be passed on as soon as possible that day, in accordance with these procedures. No staff member in receipt of such information shall keep that information to himself/ herself or attempt to deal with the matter on their own.

The feelings caused by the discovery of potential abuse by a staff member will raise different issues, e.g. disbelief that a staff member would act in this way. It is not the responsibility of a staff member to take responsibility or to decide whether a child, young person or vulnerable adult has been abused. However, it is the responsibility of the individual to act on any concerns.

On receiving information that leads to a suspicion or allegation of abuse:

Listen to the individual as detailed in section 7: How to Listen to Disclosures.

Pass your concerns to the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead on the day or if not available, the Local Authority Children's Services team (or Emergency Duty Team outside office hours) or Local Authority Designated Officer in the area where the abuse is alleged to have occurred (these are available 24 hours a day). Act on any advice given.

Make a full written record of what has been seen, heard and/or told as soon as possible in the child, young person or vulnerable adult's own words.

Sign and date the record including what you have seen, heard or been told, that day.

Records must be stored only on approved secure systems in line with Global's data retention and information security policies.

Pass the record to the Designated Safeguarding Lead or the Local Authority Children's Services team (or Emergency Duty Team outside office hours), in line with local safeguarding partnership procedures.

Important Note: If the concern is about the Designated Safeguarding Lead it must be reported to the Chief Executive of GLOBAL, or equivalent.

Actions for Designated Safeguarding Lead when Concerns are reported:

Before taking any action, the Designated Safeguarding Lead must always seek advice from the Local Authority Children's Services team (or Emergency Duty Team outside office hours) and Local Authority Designated Officer. Thereafter the Designated Safeguarding Lead may be required to work with Local Authority Children's Services team on a joint investigation. The Designated Safeguarding Lead must act on advice provided by the Local Authority Children's Services team (or Emergency Duty Team) and is likely to be asked to:

Produce a formal written report detailing:

- Name of child, young person or vulnerable adult.
- Age, date of birth of child, young person or vulnerable adult.
- Home address and telephone number of the child, young person or vulnerable adult.
- The nature of the allegation in the child, young person or vulnerable adult's own words.
- Any times, dates or other relevant information.
- Whether the person making the report is expressing their own concern or the concerns of another person.
- The child, young person or vulnerable adult's account, if it can be given, of what has happened and how any injuries occurred.
- The nature of the allegation (include all of the information obtained during the initial account e.g. time, date, location of alleged incident).
- A description of any visible (when normally dressed) injuries or bruising, behavioural signs, indirect signs (do not examine the child, young person or vulnerable adult).
- Details of any witnesses to the incident.
- Whether the child, young person or vulnerable adult's parents/ guardians /carers have been contacted.
- Details of anyone else who has been consulted and the information obtained from him or her.
- If it is not the child, young person or vulnerable adult making the report, whether the child, young person or vulnerable adult has been spoken to, if so, what was said.

- Record, sign and date on the day what you have seen, heard or been told.
- If Records must be stored only on approved secure systems in line with Global's data retention and information security policies.
- Pass the record to the Local Authority Children's Services team (or Emergency Duty Team outside office hours).

Remember: Listen; Respond; Report and Record

Establish Basic Facts

The Designated Safeguarding Lead must initially clarify the basic facts to establish whether there is reasonable cause to suspect or believe that a member may have abused a child, young person and/or vulnerable adult.

Important Note:

This may necessitate the child(ren), young person(s) or vulnerable adult(s) involved being asked some basic, open-ended, non-leading questions solely with a view to clarifying the basic facts. It may also be necessary to ask similar basic questions of other children, or other appropriate individuals. After seeking advice from the Local Authority Children's Services team (or Emergency Duty Team outside office hours), the parents/guardians may be approached to provide consent to speak to a child, young person or vulnerable adult.

Advice must be sought from the Local Authority Children's Services team (or Emergency Duty Team outside office hours) as to whether the member about whom the allegation has been made may be approached as part of the initial enquiry.

This process will not form part of the disciplinary investigation.

8.5.1 Child-on-Child Abuse

Global recognises that safeguarding concerns may arise where a child or young person harms another child or young person. All such incidents will be taken seriously and managed in accordance with this safeguarding policy.

Child-on-child abuse may include, but is not limited to: bullying (including cyberbullying), sexual violence and sexual harassment, harmful sexual behaviour (including sexting), physical abuse, emotional abuse, discriminatory abuse, gang-related violence, and coercive or exploitative behaviour.

Global will ensure that victims are supported, that appropriate action is taken to manage any alleged perpetrator, and that referrals are made to external agencies where required. Concerns will be recorded and reported in line with local safeguarding partnership procedures and statutory guidance.

8.6 How to listen to a sharing or revealing

It is important to listen carefully to the information a child or vulnerable adult discloses. When listening to a disclosure the following good practice is required:

React calmly so as not to frighten the child/vulnerable adult.

Listen to the child/vulnerable adult.

Do not show disbelief.

Tell the child, young person or vulnerable adult that he/she is not to blame and that he/she was right to tell.

Take what the child/vulnerable adult says seriously, recognising the difficulties inherent in interpreting what a child, young person or vulnerable adult says, especially if they have a speech disability and/or differences in language.

Do not pre-suppose that the experience was bad or painful - it may have been neutral or even pleasurable.

Always avoid projecting your own reactions onto the child, young person or vulnerable adult.

If you need to clarify, keep questions to the absolute minimum to ensure a clear and accurate understanding of what has been said.

If you need to clarify or the statement is ambiguous, use open-ended, non-leading questions.

Do not introduce personal information from either your own experiences or those of other children, young person or vulnerable adults.

Reassure the child, young person or vulnerable adult.

Actions to Avoid

- When receiving a revealing /sharing;
- Avoid panic.

- Avoid showing shock or distaste.
- Avoid probing for more information than is offered.
- Avoid speculating or making assumptions.
- Avoid making negative comments about the person against whom the allegation has been made.
- Avoid approaching the individual against whom the allegation has been made.
- Avoid making promises or agreeing to keep secrets.
- Avoid giving a guarantee of confidentiality.

8.6.1 Recording and Reporting a Concern or Disclosure

Safeguarding is not just the responsibility of designated individuals; it's everyone's duty to report concerns and disclosures when they arise. Concerns and disclosures should be reported as soon as possible to either the Designated Safeguarding Lead or the Deputy Designated Safeguarding Lead. This is to ensure timely intervention. The primary focus is the safety and well-being of the individual at risk, not the alleged perpetrator. Reports should be factual and objective, avoiding any personal interpretations or assumptions.

Such reports can be made using either the "Concerns Around a Child" form, if a disclosure has not been made by the individual at risk, or the "Disclosure Report" if a disclosure has made to a **GLOBAL** staff member by the individual at risk. Templates of both documents can be found in Appendix G of this Policy Document and also in the Safeguarding Templates folder of the GMUA Sharepoint.

These documents have both been designed to capture the following pieces of key information in relation to a concern or a disclosure:

- **Date and Time** - Record the exact date and time of the disclosure or observation.
- **Location** - Note where the disclosure/incident occurred.
- **Who Was Present** - Document all individuals present during the disclosure or incident.
- **Details of the Disclosure or Concern** - Include the child's or individual's words, especially if they are the words of the person disclosing the abuse. If it is not possible to record the exact words, explain why.

- **How the Person Appeared** - Describe the person's demeanour, physical state, and any observable signs.
- **Witnesses** - Note any witnesses to the disclosure or incident.
- **Evidence** - If there is any physical evidence, record it and retain it securely.

8.6.2 Recording, Storing and Sharing Safeguarding Information

All safeguarding concerns, disclosures, and actions taken must be recorded accurately, factually, and without delay. Records must distinguish clearly between fact, professional opinion, and third-party information.

Safeguarding records will be stored securely, either electronically or in hard copy, in accordance with the Data Protection Act 2018 and UK GDPR. Access will be limited strictly to authorised staff on a need-to-know basis.

Where safeguarding information is shared with external agencies, this will be done lawfully, proportionately, and in a timely manner to protect the individual at risk. Consent will be sought where appropriate, unless doing so would place a child or adult at further risk of harm.

Safeguarding records will be retained in line with Global's data retention schedule and local authority guidance.

8.6.3 Thresholds for Escalation and Referral

Global recognises that safeguarding concerns exist along a continuum, ranging from emerging concerns through to significant harm. All concerns will be taken seriously and considered in line with local safeguarding partnership threshold guidance.

Where a concern indicates that a child or adult at risk may be suffering, or is likely to suffer, significant harm, a referral will be made without delay to the appropriate Local Authority Children's or Adult Social Care team.

Where concerns do not meet the threshold for immediate referral, they will be monitored, recorded, and reviewed, with early help or pastoral support offered where appropriate. Staff must escalate concerns if risk increases, patterns emerge, or new information becomes available.

Staff should not attempt to determine the outcome of a concern themselves. When in doubt, advice must be sought from the Designated Safeguarding Lead, Deputy DSL, or the relevant safeguarding partnership.

Where the individual is an adult at risk, referrals will be made to the relevant Local Authority Adult Social Care team in line with Care Act 2014 duties.

8.7 Prevent

Prevent is 1 of the 4 elements of [CONTEST, the government's counter-terrorism strategy](#). It aims to stop people becoming terrorists or supporting terrorism.

The Prevent strategy:

- Responds to the ideological challenge we face from terrorism and aspects of extremism, and the threat we face from those who promote these views.
- Provides practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support.
- Works with a wide range of sectors (including education, criminal justice, faith, charities, online and health) where there are risks of radicalisation that we need to deal with.

The strategy covers all forms of terrorism, including far right extremism and some aspects of non-violent extremism.

The Home Office works with local authorities, a wide range of government departments, and community organisations to deliver the Prevent strategy. The police also play a significant role in Prevent, in much the same way as they do when taking a preventative approach to other crimes.

The Home Office uses a range of measures to challenge extremism in the UK, including:

- Where necessary, preventing apologists for terrorism and extremism from travelling to this country.
- Giving guidance to local authorities and institutions to understand the threat from extremism and the statutory powers available to them to challenge extremist speakers.
- Funding a specialist police unit which works to remove online content that breaches terrorist legislation.
- Supporting community-based campaigns and activity which can effectively rebut terrorist and extremist propaganda and offer alternative views to our

most vulnerable target audiences - in this context they work with a range of civil society organisations

- Supporting people who are at risk of being drawn into terrorist activity through the Channel process, which involves several agencies working together to give individuals access to services such as health and education, specialist mentoring and diversionary activities.

GLOBAL is committed to supporting vulnerable people through its safeguarding agenda in order to prevent potential radicalisation. **GLOBAL** is represented at Local Authority groups. **GLOBAL** has engaged positively with the Workshop and online training to raise awareness of Prevent (WRAP) to ensure key staffs have the skills and knowledge to refer any concerns appropriately.

8.8 Modern Slavery and Human Rights

Modern slavery and human trafficking statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We are committed to improving our practices to combat slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business. If this is identified, we will follow the procedure for safeguarding.

8.9 Making a Referral in Cases of Suspected and/or Alleged Abuse

If the basic facts support a suspicion or allegation of abuse:

- The Designated Safeguarding Lead will refer the suspicion and/or allegation to the Local Authority Children's Services team (or Emergency Duty Team outside office hours), as soon as possible that day.
- Appropriate steps may be required to ensure the safety of the child(ren), young person(s) or vulnerable adult(s) who may be at risk.

- A record should be made of the name and designation of the Local Authority Children's Services team (or Emergency Duty Team) member of staff to whom the concerns were passed, together with the time and date of the call, in case any follow up is required.
- Following advice from the Local Authority Children's Services team (or Emergency Duty Team), the parent/guardian of the child, young person or vulnerable adult should be contacted as soon as possible.

Important Note:

Reporting of the matter to the Local Authority Children's Services team (or Emergency Duty Team) must not be delayed by attempts to obtain more information. A Referral for Reporting Suspicions and/or Allegations of Abuse against a Member of GLOBAL Form must be completed as soon as possible that day. Where possible, a copy of this form must be sent to the Local Authority Children's Services team (or Emergency Duty Team outside office hours) within 24 hours.

Where the individual is an adult at risk, referrals will be made to the relevant Local Authority Adult Social Care team in line with Care Act 2014 duties.

8.10 Possible Outcomes following advice from Local Authority Children's Social Care

Where the initial enquiry reveals that there is reasonable cause to suspect or believe that a member has abused a child, young person and/or vulnerable adult there will be an investigation.

There are three types of investigation that can result:

- A disciplinary investigation
- A child protection investigation
- A criminal investigation

Following advice from the Local Authority Children's Services team (or Emergency Duty Team), disciplinary action may be taken in cases where a criminal investigation is ongoing provided sufficient information is available to enable a decision to be made and doing so does not jeopardise the criminal investigation.

8.11 Managing the Member of staff against whom the Allegation has been made

Following advice from the Local Authority Children's Services team (or Emergency Duty Team), if the decision is made that the member of staff against whom the allegation has been made is to be informed, the member should be told an allegation has been made which suggests abuse. It is essential to preserve evidence for any criminal proceedings while at the same time safeguarding the rights of the member.

8.12 Suspension

Suspension is not a form of disciplinary action. The member may be suspended whilst an investigation is carried out.

Suspension will be carried out by the Designated Safeguarding Lead in accordance with GLOBAL's Disciplinary Procedures.

At the suspension interview the member will be informed of the reason suspension is taking place and given the opportunity to give a statement should he/she wish. Notification of the suspension and the reasons will be conveyed in writing to the member in accordance with GLOBAL's Disciplinary Procedures.

8.13 Managing False or Malicious Allegations

- Where after investigation, the allegation is found to be false or malicious the member will receive an account of the circumstances and/or investigation and a letter confirming the conclusion of the matter. The member of staff involved may wish to seek legal advice.
- All records pertaining to the circumstances and investigation will be destroyed.
- Where this involves a member staff of GLOBAL, they will be advised of the appropriate counselling services available.

8.14 Managing Allegations of Historical Abuse

- Allegations of abuse may be made some time after the event e.g. an adult who was abused as a child by a member who is still currently working with children, young people or vulnerable adults. Where such an allegation is made the procedures for managing allegations of abuse, detailed in Section 8.2, must be followed.

9 Sharing concerns with Parents, Guardians or Carers

9.1 Where it is not Abuse

There is always a commitment to work in partnership with parents/guardians/carers where there are concerns about a child, young person or vulnerable adult. Therefore, in most situations, not involving the possibility of the abuse of a child, young person or vulnerable adult, it would be important to talk to parents/guardians/carers to help clarify any initial concerns. For example, if a child, young person or vulnerable adult seems withdrawn, he/she may have experienced an upset in the family, such as a parental separation, divorce or bereavement. Common sense is advised in these situations however advice should be sought from Designated Safeguarding Lead if there is any uncertainty about the appropriate course of action.

9.2 Allegations of Abuse

There are circumstances in which a child, young person or vulnerable adult might be placed at even greater risk if concerns are shared e.g. where a parent/guardian/carer may be responsible for the abuse or not able to respond to the situation appropriately. **In all cases of suspected or alleged abuse, advice and guidance must first be sought from the LOCAL AUTHORITY DESIGNATED LEAD as to who contacts the parents.**

The Salford Bridge Partnership can be contacted by telephone on **0161 603 4500**, or the **Emergency Duty Team** on 0161 794 8888 outside office hours. Alternatively you can complete an online referral form.

If you are worried about a young person in emotional distress and think they need urgent help, but are not sure which service is best placed to help, you can also get advice from: **Salford CAMHS – 0161 518 5400 (Mon – Fri, 9.00am – 5.00pm)**

All staff are given training on the Salford services specific to the concern with direct contact numbers for quick efficient referral systems to take place.

APPENDIX A

Definition of Terms

Child:

A child is defined as anyone under 18 years of age.

Young people:

A young person refers to an individual aged 16 or 17. For safeguarding purposes, young people are legally defined as children and must be safeguarded accordingly.

Vulnerable Adult (Adult at Risk):

A vulnerable adult is a person aged 18 or over who:

- has needs for care and/or support (whether or not the local authority is meeting those needs),
- is experiencing, or is at risk of, abuse or neglect, and
- as a result of those needs is unable to protect themselves from the risk of abuse or neglect

A vulnerable adult may need health or social support services and may be unable to take care of themselves and/or to protect themselves from harm or exploitation.

Several studies suggest that children, young people and vulnerable adults are at increased risk of abuse. Various factors contribute to this such as stereotyping, prejudice, discrimination, isolation and a powerlessness to protect them or adequately communicate that abuse has occurred.

Types of Abuse

It is generally accepted that there are four forms of abuse. However, in some cases negative discrimination and bullying can have severe and adverse effects on a child or vulnerable adult. GLOBAL is committed to protecting children, young people and vulnerable adults from all forms of abuse.

Recognising abuse is not easy and it is not a person's responsibility to decide whether a child, young person or vulnerable adult has been abused. It is a person's responsibility to pass on any concerns and for the Local Authority Children's Services team to investigate.

The signs of abuse listed are not definitive or exhaustive. The list is designed to help GLOBAL members to be more alert to the signs of possible abuse.

Children, young people and vulnerable adults may display some of the indicators at some time; the presence of one or more should not be taken as proof that abuse is occurring. Any of these signs or behaviours must be seen in the context of the child/vulnerable adult's whole situation and in combination with other information related to the child/vulnerable adult and his/her circumstances. There can also be overlap between different forms of abuse.

Emotional Abuse

Emotional abuse is the persistent emotional ill treatment of a child, young person or vulnerable adult such as to cause severe and adverse effects on their emotional development. It may involve conveying that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of another person.

It may feature age or developmentally inappropriate expectations being imposed on children or vulnerable adults. It may also involve causing a child or vulnerable adult to frequently feel frightened or in danger, or the corruption or exploitation of a child or vulnerable adult.

Emotional abuse may include the persistent failure to show self-respect, build self-esteem and confidence by children, young person or vulnerable adults that may be caused by:

- Exposure to humiliating or aggressive behavior or tone.
- Failure to intervene where self-confidence and worth are challenged or undermined.

Signs of possible emotional abuse:

- Low self esteem
- Continual self-deprecation
- Sudden speech disorder
- Significant decline in concentration
- Immaturity
- 'Neurotic' behavior e.g. rocking
- Self-mutilation
- Compulsive stealing
- Extremes of passivity or aggression
- Running away
- Indiscriminate friendliness

Neglect

Neglect is the persistent failure to meet a child, young person or vulnerable adult's basic physical and/or psychological need. It may involve a parent or carer failing to provide adequate food, shelter, warmth, clothing and cleanliness. It may also include leaving a child home alone, exposure in a manner likely to cause unnecessary suffering or injury or the failure to ensure that appropriate medical care or treatment is received.

Neglect may include the lack of care, guidance, supervision or protection that may be caused by:

- Exposure to unnecessary cold or heat.
- Exposure to unhygienic conditions, lack of food, water or medical care.
- Non-intervention in bullying or taunting.

Neglect, as well as being the result of a deliberate act, can also be caused through the omission or the failure to act or protect.

Signs of possible neglect:

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

Physical Abuse

Physical Abuse may involve the actual or attempted physical injury to a child, young person or vulnerable adult including hitting, shaking, throwing, poisoning, and burning, scalding, drowning, suffocating or otherwise harming them.

Physical Abuse may also be caused when a parent or carer feigns the symptoms of or deliberately causes ill health to a child whom they are looking after. This situation is described as Munchausen Syndrome by Proxy. A person may do this because they need or enjoy the attention; they receive through having a sick child.

Physical abuse may also be a deliberate act, omission or failure to protect.

Physical abuse may include bodily harm caused by lack of care, attention or knowledge that may be caused by:

- Over training or dangerous training of athletes.
- Over playing an athlete.
- Failure to do a risk assessment of physical limits or pre-existing medical conditions
- Administering, condoning or failure to intervene in drug use.

Signs of possible physical abuse:

Most children will sustain cuts and bruises throughout childhood. These are likely to occur in boney parts of the body like elbows, shins and knees. In most cases injuries or bruising will be genuinely accidental. An important indicator of physical abuse is where bruises or injuries are unexplained, or the explanation does not fit the injury, or the injury appears on parts of the body where accidental injuries are unlikely e.g. on the cheeks or thighs. The age of the child must also be considered.

Signs of possible physical abuse include:

- Unexplained injuries or burns, particularly if they are recurrent, improbable excuses given to explain injuries.
- Refusal to discuss injuries.
- Fear of parents being approached for an explanation.
- Untreated injuries or delays in reporting them.
- Excessive physical punishment to themselves.
- Arms and legs kept covered in hot weather.
- Avoidance of swimming, physical education etc.
- Fear of returning home.
- Aggression towards others.
- Running away.

When considering the possibility of non-accidental injury, it is important to remember that injuries may have occurred for other reasons e.g. skin disorders, rare bone diseases.

Sexual Abuse

Sexual abuse involves forcing or enticing a child, young person or vulnerable adult to take part in sexual activities whether they are aware of or consent to what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. This may include non-contact activities such as forcing children or vulnerable adults to look at or be involved in the production of pornographic material, to watch sexual activities or encouraging them to behave in sexually inappropriate ways.

Boys and girls can be sexually abused by males and/or females, including persons to whom they are not related and by other young people. This includes people from all walks of life.

Sexual abuse could include contact and non-contact activities and may be caused by:

- Exposure to sexually explicit inappropriate language, jokes or pornographic material
- Inappropriate touching
- Having any sexual activity or relationship
- Creating opportunities to access children or vulnerable adults' bodies

Not all children, young person or vulnerable adults are able to tell that they have been sexually assaulted. Changes in their behavior may be a signal that something has happened. It is important to note that there may be no physical or behavioral signs to suggest that a child or vulnerable adult has been sexually assaulted.

A child or vulnerable adult who is distressed may display some of the following physical, behavioural or medical signs that should alert you to a problem. It is the combination and frequency of these that may indicate sexual abuse. Always seek advice.

Signs of possible sexual abuse:

- Behavioural
- Lack of trust in adults or over familiarity with adults
- Fear of an adult
- Social isolation -withdrawn or introversion
- Sleep disturbance (nightmares, bed-wetting, fear of sleeping alone, needing a night light)
- Running away from home
- Girls taking over the mothering role
- Sudden school problems e.g. falling standards, truancy
- Reluctance or refusal to participate in physical activity or to change clothes for games
- Low self-esteem
- Drug, alcohol or solvent abuse
- Display of sexual knowledge beyond child's age e.g. French kissing
- Unusual interest in the genitals of adults, children or animals
- Fear of bathrooms, showers, closed doors
- Abnormal sexual drawings
- Fear of medical examinations
- Developmental regression

- Poor peer relationships
- Over sexualised behavior
- Compulsive masturbation
- Stealing
- Irrational fears
- Psychosomatic factors e.g. recurrent abdominal or headache pain
- Sexual promiscuity
- Eating disorders
- Physical or Medical signs
- Sleeping problems, nightmares, fear of the dark
- Bruises, scratches, bite marks to the thighs or genital areas
- Anxiety, depression
- Eating disorder e.g. anorexia nervosa or bulimia
- Discomfort/difficulty in walking or sitting
- Pregnancy -particularly when reluctant to name the father
- Pain on passing urine, recurring urinary tract problem, vaginal infections or genital damage
- Venereal disease/sexually transmitted diseases
- Soiling or wetting in children who have been trained
- Self-mutilation, suicide attempts
- Itchiness, soreness, discharge, unexplained bleeding from the rectum, vagina or penis
- Stained underwear
- Unusual genital odor

Negative Discrimination (including racism)

Children, young people and vulnerable adults may experience harassment or negative discrimination because of their race or ethnic origin, socio-economic status, culture, age, disability, gender, sexuality or religious beliefs. Although not in itself a category of abuse, it may be necessary for the purposes of the Child, Young Person and Vulnerable Adult Protection Policy and Procedures, for negative discriminatory behaviour to be categorised as emotional abuse.

Important Note: All organisations working with children, young people and vulnerable adults including those operating where black and ethnic communities are numerically small, should address institutional racism, defined in the MacPherson Inquiry report on Stephen Lawrence as:

‘The collective failure by an organisation to provide appropriate and professional service to people on account of their race, culture and/or religion’.

Bullying

It is important to recognise that in some cases of abuse; it may not always be an adult abusing a young person or vulnerable adult. It can occur that the abuser may be a young person, for example in the case of bullying.

APPENDIX B

Statement of Parental/Guardian Consent

- I confirm that I am the child's, young persons or vulnerable adult legal parent/guardian, and I consent to my child taking part in all activities, on and off site, whilst attending GLOBAL, which are arranged and supported by trained staff, students and volunteers.
- I give permission for information that is relevant to be shared with staffs that has direct contact with my child.
- I give permission for relevant information to be shared with other agencies for the purpose of monitoring and to ensure my child's; young persons or vulnerable welfare remains paramount.
- I also give permission for necessary emergency treatment to be carried out on my child, young person or vulnerable adult when a GLOBAL Representative presents him/her at hospital.
- I do / do not wish for students to use photographs/observations/ drawings etc. for college purposes e.g. course portfolio.
- I do / do not wish my child's, young persons or vulnerable adult photograph to be included in any future GLOBAL promotional material.
- The information supplied is accurate and I understand that failure to disclose all relevant information may result in my child losing their place.

Signed: _____

Please print name: _____

Date: _____

APPENDIX C

Referral form

This form must be completed as soon as possible after receiving information that causes suspicion or an allegation of the abuse of a child or vulnerable adult. This must be passed to the Designated Safeguarding Lead and the Local Authority Children's Services team (or Emergency Duty Team outside office hours) as soon as possible after completion. Do not delay by attempting to obtain information to complete all the details.

Note: Confidentiality must always be maintained. Information must only be shared on a need to know basis i.e. only if it will protect the child. Do not discuss this incident with anyone other than those who need to know.

Continue a separate sheet of paper if required and attach securely to this form.

Details of person making report

Name:
Position:
Contact telephone number:

Details of Child/Young person/Vulnerable Adult

Name:
Date of Birth:
Address:
Contact telephone number:
Names and address of parents/guardian/carers:

Name:
Position:
Date of Birth:
Address:
Relationship to child/young person/vulnerable adult:

Details of person about whom there is concern

If you are reporting this alleged incident on behalf of someone else, please provide details of that person:

Name:
Position:
Address:
Contact telephone number:
Date this person advised you of alleged incident:
Record here the information you were given from this person about the alleged incident:

--

Details of the alleged incident

Date of alleged incident:
Time:
Place:
Names and addresses of witnesses:
Describe in detail what happened (Please use a separate sheet if required, this must be signed and dated):
Describe in detail visible injuries/bruises and concerning behaviour of the child/vulnerable adult, if any (use diagrams if this helps you to describe):

Was the child/vulnerable adult asked what happened: YES/NO

If yes, record exactly what the child said in their own words and any questions asked if the situation needed clarified:

Details of action taken

Details of external agencies contacted

Police	Police station contacted: Name and contact number: Advice received:
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Detail what action, if any, has been taken following receipt of this information:

ONLY AFTER SEEKING ADVICE FROM THE LOCAL AUTHORITY CHILDREN'S SOCIAL CARE, were the child/young person/vulnerable adult's parent's/carers contacted?

Local Authority Children's Services team (or Emergency Duty Team outside office hours)	Local Authority Children's Services team (or EDT) Dept: Name and contact number: Advice received:
Other	Name of organisation: Name and contact number: Advice received:

Other information

Record any other information you have about this matter (it is important that all information is passed on even that which you think is not important or helpful).

Signature:

Print name:

Date:

Where a referral has been made to the Local Authority Children's Services team (or Emergency Duty Team outside office hours) a copy of this form must be sent to them as soon as possible.

APPENDIX D

Legal Framework

This safeguarding policy and its associated procedures are informed by the following current legislation and statutory guidance (England):

- [Children Act 1989](#) - Establishes the legal framework for the protection of children and the duties of local authorities to safeguard and promote welfare.
- [Children Act 2004](#) - Places a duty on organisations and individuals working with children to safeguard and promote their welfare.
- [Working Together to Safeguard Children](#) - Statutory guidance on inter-agency working to safeguard and promote the welfare of children.
- [Keeping Children Safe in Education \(KCSIE\)](#) - Statutory safeguarding guidance for schools, colleges, and education providers.
- [Education Act 2002](#) - Places safeguarding duties on education providers.
- [Safeguarding Vulnerable Groups Act 2006](#), as amended by the [Protection of Freedoms Act 2012](#) - Governs regulated activity and barring arrangements.
- [Care Act 2014](#) - Statutory framework for safeguarding adults at risk.
- [Counter-Terrorism and Security Act 2015](#) - Places a duty on specified authorities to have due regard to preventing people from being drawn into terrorism (Prevent).
- [Modern Slavery Act 2015](#) - Addresses risks relating to slavery, servitude, forced labour, and human trafficking.
- [Equality Act 2010](#) - Protects individuals from discrimination and supports inclusive safeguarding practice.
- [Human Rights Act 1998](#) - Underpins safeguarding through the protection of fundamental rights and freedoms.
- [Data Protection Act 2018](#) and [UK GDPR](#) - Regulates the lawful processing and sharing of personal data in safeguarding contexts.

This policy also reflects **local safeguarding partnership procedures** for the areas in which Global operates, including:

- **Trafford Safeguarding Children Partnership** (home local authority):
<https://www.trafford.gov.uk/residents/children-and-family-services/strategic-partnerships/tscp.aspx>

- **Salford Safeguarding Children Partnership:**
<https://safeguardingchildren.salford.gov.uk/>
- **Manchester Safeguarding Children Partnership:**
<https://www.manchestersafeguardingboards.co.uk/>
- **Tameside Safeguarding Children Partnership:**
<https://www.tamesidescp.org.uk/>
- **Liverpool Safeguarding Children Partnership:** <https://liverpoolscp.org.uk/>
- **Knowsley Safeguarding Children Partnership:** <https://knowsleyscp.org.uk/>
- **Cheshire East Safeguarding Children Partnership:**
<https://www.cheshirescp.org.uk/>
- **Cheshire West and Chester Safeguarding Children Partnership:**
<https://www.cheshirescp.org.uk/>

APPENDIX E

Safeguarding Concerns Flowchart

Step 1

A safeguarding concern is identified

A concern may arise from:

- A disclosure by a child or young person
- An observation (physical, behavioural, emotional)
 - Information from a third party
 - Online or digital activity
- Child-on-child (peer-on-peer) abuse



Step 2

Is a child or adult at risk of harm?

This includes concerns involving another child or young person.

Staff should note:

- If the answer is YES
- If the answer is NO
- If the answer is UNSURE

Staff must not assess safeguarding thresholds themselves.

Proceed to Step 3 in all cases.



Step 3

Immediate action by staff

Staff must:

- Listen calmly and reassure the individual
 - Not promise confidentiality
 - Not ask leading questions
 - Not investigate the concern

The concern must be recorded promptly and factually.



Step 4

Report the concern immediately

The concern must be reported to:

- The Designated Safeguarding Lead (DSL)

If the DSL is unavailable:

- Report to the Deputy Designated Safeguarding Lead (DDSL)



Step 5

Does the concern involve child-on-child (peer-on-peer) abuse?

This includes (but is not limited to):

- Bullying or cyberbullying
- Sexual violence or sexual harassment
 - Harmful sexual behaviour
- Physical or emotional abuse
 - Discriminatory abuse
- Gang-related or exploitative behaviour

If YES:

- Treat as a safeguarding concern
- Follow the same safeguarding procedures as all other abuse

Proceed to Step 6.

If NO:

Proceed to Step 6.



Step 6

DSL / DDSL reviews the concern

The DSL or DDSL will:

- Consider the nature and level of risk
- Refer to local safeguarding partnership threshold guidance
 - Decide on the appropriate course of action



Step 7

Threshold decision

If there is reasonable cause to suspect significant harm:

- Make an immediate referral to Local Authority Children's Social Care
 - If out of hours, contact the Emergency Duty Team (EDT)
- If the threshold is unclear:
 - The DSL seeks advice from:
 - Local Authority Children's Social Care
 - The safeguarding partnership
 - The Local Authority Designated Officer (LADO), where allegations

- involve a professional
- If the concern does not meet the threshold for referral:
- Manage internally through monitoring
 - Provide early help or pastoral support where appropriate
 - Review and escalate if risk increases or new information emerges



Step 8

Recording, storing and sharing safeguarding information

All safeguarding concerns, decisions, and actions must be:

- Accurately and factually recorded without delay
- Clear in distinguishing fact, professional opinion, and third-party information

Safeguarding records must be:

- Stored securely
- Accessible only to authorised staff on a need-to-know basis
- Handled in line with the Data Protection Act 2018 and UK GDPR

Information may be shared without consent where necessary to protect a child or adult at risk.



Step 9

Ongoing review

The DSL / DDSL will:

- Review safeguarding concerns regularly
 - Monitor for patterns or escalation
 - Reassess thresholds where needed

All staff must remain alert to new or emerging concerns.

IMPORTANT NOTE

All safeguarding concerns, including child-on-child abuse, must be reported immediately.

Staff must not decide thresholds independently and must always follow this safeguarding policy and local safeguarding partnership procedures.

APPENDIX F

Useful Contact Information & Local Authority Safeguarding Priorities

GLOBAL works with children from different local authorities within and around Greater Manchester, within this appendix you will find all the relevant authority LADO numbers of other useful contacts and information.

Global DSL & DDSL Contact Details

Role/Organisation	Name	Contact Details
Head of Operations, SENDCo and Designated Safeguarding Lead for Global Make up Academy Ltd. Manchester	Leila Magee	leilam@globalmakeupacademy.co.uk 0161 726 5726 07950768601
QA & Compliance Manager and Designated Safeguarding Lead for Global Make up Academy Ltd. Manchester	Ben Levy	ben.levy@globalmakeupacademy.co.uk 0161 726 5726
Head of Teaching Staff and Deputy Designated Safeguarding Lead for Global Make up Academy Ltd. Manchester	Georgia Matthews	georgiam@globalmakeupacademy.co.uk 0161 726 5726
ITR Practitioner, Building Manager and Deputy Designated Safeguarding Lead for Global Make up Academy Ltd. Manchester	Yvette Twist	yvette@globalmakeupacademy.co.uk 0161 726 5726

Local Authority (LADO) Contact Details

Role/Organisation	Name	Contact Details
Local Authority Designated Officer (LADO) Salford	Steve Westhead	0161 603 4350
Local Authority Designated Officer (LADO) Manchester	Majella O'Hagan	quality.assurance@manchester.gov.uk 0161 234 1214
Local Authority Designated Officer (LADO) Trafford	Chris Riley	07786117834
Local Authority Designated Officer (LADO) Liverpool	Mark Goddard	lado@liverpool.gov.uk 0771 670 2034
Local Authority Designated Officer (LADO) Cheshire East	TBC	LADO@cheshireeast.gov.uk 01270 685904

Local Authority Designated Officer (LADO) Cheshire West & Chester	TBA	i-ART@cheshirewestandchester.gov.uk 0300 123 7047
Local Authority Designated Officer (LADO) Tameside	TBA	ladoreferrals@tameside.gov.uk 0161 342 4343
Local Authority Designated Officer (LADO) Knowsley	Carla Middleton	Carla.Middleton@knowsley.gov.uk 0151 443 3928

Role/Organisation	Contact Details	Out of Office Contact Details
The Salford Bridge Partnership	01616034500	Emergency Duty Team 0161 794 8888
Missing From Home Tel	0161 603 4500	
Emergency Duty Team	0161 793 8888	
Greater Manchester Police	101/999 *Immediate Concern*	N/A
Salford Safeguarding Unit	0161 603 4350	
Manchester Children Services	0161 234 5001	

Salford Safeguarding Children Partnership (SSCP) Annual Report

The most recent version of the report can be downloaded from the following web address: <https://safeguardingchildren.salford.gov.uk/about-the-partnership/annual-report/>

This can be downloaded both in full, and as a summarised version.

APPENDIX G

Disclosure Report

Name of young person:			
Date of birth:			
Placement:		Global Make up Hiar and Productions Academy	
Date disclosure was made:			Time disclosure was made:
Name of person completing the form:			
Type of Disclosure <i>(more than one can apply)</i>			
Peer on Peer Abuse:	Bullying (including cyber bullying)		
	CSE		
	Harmful Sexual Behaviour (including sexting)		
	Gang Activity & Youth Violence		
	Domestic Violence		
	No Peer on Peep Abuse (N/A)		
Safeguarding disclosure?			
Yes		No	
Types of abuse:	Physical Abuse		
	Emotional/Psychological Abuse		
	Sexual Abuse		
	Financial or Material Abuse		
	Discriminatory Abuse		
	Organisational Abuse		
	Neglect		
	Self-Neglect		
	Domestic Abuse		
	Modern Slavery		
	Substance Misuse		
	Self-harm		
	None apply (N/A)		
Who is the disclosure concerning?	Themselves		
	Family		
	Friend		
	Professional		
	Peers		
	Staff Member		
	Community		
	Unknown		

		Third Party			
		Other			
Duty Team informed by phone:			Yes		No
Services involved:	Police		Log No.		
	Ambulance		Log No.		
	Fire Service		Log No.		
	Other		Log No.		
RIDDOR Report made:			Ref No.		
Details of disclosure. Please Include:					
Detailed summary of what took place. What was said and by whom. Who was involved? Any other important information.					
Have you(staff) informed the young person who this disclosure will be shared with and why?					
Yes				No	
Details of any injuries and what support was offered: <i>(if applicable)</i> :					
Did staff offer any First Aid or any First Aid items, did staff prompt/offer the young person to seek medical attention/assistance, 111/999 called...					
If injury occurred, was a body map used to show injury? (please attach to the bottom of the document)			Yes		No
Staff members who witnessed the disclosure to sign:					
Name:					
Sign:			Date:		
Name:					
Sign:			Date:		
Checklist: <i>(Please highlight and cross reference)</i>					
Team Leader / Management team informed?					
Cross Referenced in the Daily Monitoring Record?					
Any complaints handed to Team Leader?					
Copy sent to distribution list?					
If out of office hours, Social Worker to be sent an email to say a disclosure report is going to follow the next working day?					
DSL's Comment:					

•			
DSL's Signature:		Date:	

Concerns About a Child Form

Child's full name:		Date of birth:	
Provider name:		Provision room or named area:	
Concern identified by:		Role:	
Date of concern:		Time of concern:	
Place of incident:		Witnesses:	
Name of alleged child or person responsible for the harm or potential harm:		Position of alleged child or persons e.g., family member, member of staff, child in provision, senior member of staff, volunteer, not known, other:	

Concern, Incident or Disclosure: Why are you concerned about this child? What have you observed and when?

What have you been told and when? Please provide a description of any incidents or anything you see or have been told by a child, or another person. Record any visible injuries or ask the child or young person to point to where else it is sore or hurts. Do not remove or lift clothing for the purpose of the examination unless the injury site is freely available because of treatment. Do not take photos of injuries. If photos of injuries are required for evidence purposes, then this should be done by the police.

Remember to make clear what is fact and what is hearsay and opinion. Note the language and terminology used by the child, or adult, and be clear about who has said what.

--

Has any action already been taken in relation to this concern?

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Date and Name of person concerns reported to:

--

Action to be taken and recommendations from Designated Safeguarding Lead:

Name of person completing form:	
Signature:	
Date and time:	

Reviewed by	Quality Assurance & Compliance Manager
Reviewed	Annually, before start of a new academic year
Last Review	11/06/2026
Review Date	30/08/2026

Reviewed: Signed: B Levy..... Date: 11/06/26

Benjamin Levy
Quality Assurance & Compliance Manager