

Safeguarding Children and Adults at Risk Policy



Policy Date: April 2021

Reviews

Date	Key changes (if any)	Next review
Jun 22	No changes	Jun 23
September 23	Staff names added for DSL	September 24
July 24	Email added for DSL	July 25
August 25	DSL details changed	August 26
February 26	Updated safeguarding policy to reflect Keeping Children Safe in Education (KCSIE) 2025 and current statutory safeguarding guidance. Strengthened bullying, harassment and sexual harassment safeguarding provisions, expanded adult safeguarding legislative references, and introduced a safeguarding reporting flowchart to clarify referral and escalation procedures.	February 27
September 2026	Updated funding agency reference from ESFA to the Department for Education	September 2027

General policy statement

Community Matters has a statutory and moral duty to ensure that the welfare of children and vulnerable adults at risk, receiving training and education through our services are safeguarded and promoted and expects all staff and volunteers to share this commitment. It is the responsibility of all staff to ensure that they carry out their duties in accordance with the duty to safeguard and that they take prompt and appropriate action when they have concerns about a child, young person or vulnerable adult.

Background

This policy has been developed in accordance with the principles established by the:

- Children Acts 1989 and 2004 and related guidance. This includes: DfE statutory guidance: Keeping Children Safe in Education (KCSIE) 2025.
<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>
- Working Together to Safeguard Children (2023)
<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>
- Care Act 2014 — statutory framework for safeguarding adults with care and support needs
- Safeguarding Vulnerable Groups Act 2006 — Disclosure and Barring Service (DBS) and barred list framework for individuals working with children and adults at risk
- Mental Capacity Act 2005 — protecting and supporting adults who may lack capacity to make specific decisions

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- Prevent Duty Guidance for England and Wales (2023 update)
- DfE Child Sexual Exploitation (February 2017).
- Sexual Violence and Sexual Harassment between Children in Schools and Colleges (2021)
- HM Government “What to do if you’re worried a child is being abused” (2015, updated guidance referenced within KCSIE 2025)
- UKCIS (UK Council for Internet Safety) guidance on sharing nudes and semi-nudes: advice for education settings working with children and young people (2020)

Community Matters has regard to Keeping Children Safe in Education (KCSIE) 2025 as the key statutory safeguarding guidance for organisations working with children and young people, and applies its principles proportionately within apprenticeship and adult learning provision.

Community Matters recognises its responsibility under Section 175 of the Education Act 2002 to safeguard and promote the welfare of children and adults at risk and to work together with other agencies to ensure adequate arrangements within our organisation to identify, assess and support those children and adults at risk who are suffering harm.

Objectives

The Directors are committed to ensuring that Community Matters:

- creates a culture of vigilance
- protects children and adults at risk from maltreatment and recognises when they are at risk and how to get help when they need it
- considers the importance of considering wider environmental factors in a child/adult at risk’s life that may be a threat to their safety and or welfare. This is known as Contextual Safeguarding.
- prevents impairment to physical and mental health/development
- ensures provision of safe and effective care
- takes action to enable all children and adults to have the best outcome
- safeguards and promotes the welfare of all students, including apprentices and learners on industry placement programmes
- identifies/refers children at risk to the appropriate agencies
- co-operates with investigating agencies
- supports children in need and contributes towards early help offer
- records and reports racist incidents
- promotes safe recruitment practices
- names a Designated Safeguarding Lead within the Senior Leadership team
- provides Safeguarding training to all staff

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- offers a curriculum that promotes safeguarding/safety
- shares information with the police
- supports students with medical conditions
- meets the needs of students with special educational needs and/or disabilities
- recognises that young people are capable of abusing their peers
- takes the wishes and feelings of children into account
- provides staff code of conduct
- responds to instances where children go missing
- supports evidence compliance to the local safeguarding partnerships. Local safeguarding partnerships comprise the local authority, police and integrated care board (health partners), who work together to coordinate safeguarding arrangements.
- appoints a designated person to promote the achievement of Looked After Children and care leavers; and takes appropriate action, including referrals, to see that such children and adults at risk are kept safe, both at home and within their learning environment.

Bullying, harassment and sexual harassment

Community Matters recognises that bullying, harassment and sexual harassment can constitute safeguarding concerns and may place children, young people and adults at risk of harm. This includes peer-on-peer abuse, workplace bullying experienced by apprentices, online harassment, and unwanted sexual behaviour.

All reports of bullying, harassment or sexual harassment will be taken seriously, recorded appropriately, and responded to in line with safeguarding procedures. Where concerns indicate risk of harm, referrals will be made to appropriate safeguarding agencies and employers will be engaged where relevant to ensure learners are safe within the workplace.

Learners are supported to report concerns, and staff are trained to recognise indicators of harmful behaviour, including sexual harassment, coercion, exploitation and harmful power dynamics.

Where concerns meet safeguarding thresholds, including incidents involving sexual abuse, coercion, exploitation, harmful sexual behaviour, or risk of significant harm, Community Matters will follow local safeguarding partnership procedures and make referrals to children's social care, adult social care and/or the police as appropriate.

In apprenticeship, where concerns arise within the workplace, Community Matters will work with employers to ensure appropriate risk management while prioritising the safety and wellbeing of the learner and maintaining safeguarding referral responsibilities.

Information sharing and data protection

Information sharing is vital to safeguarding and promoting the welfare of children and adults at risk. Community Matters will share information in accordance with the Data Protection Act 2018, UK GDPR, and the government's guidance Information sharing: Advice for practitioners

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(2023). Information will only be shared when it is lawful, necessary, and proportionate.

Definitions

1. The **Children's Act** defines a "child" as a person under the age of 18.
2. The **Care Act 2014** defines an adult at risk as:
 - Someone over the age of 18 who has a need for care and support
 - Someone who is experiencing or is at risk of neglect or abuse
 - As a result of the above needs, the adult is unable to protect themselves against the abuse or neglect, or the risk of it.
 - The term "Adult at Risk" is used in place of "Vulnerable Adult"
3. A learner may be classed as an adult at risk for a number of reasons including:
 - is living in residential accommodation, such as a care home or a residential special school
 - is living in sheltered housing
 - is receiving domiciliary care in their own home or is receiving any form of healthcare
 - is detained in a prison, remand centre, young offender institution, secure training centre or attendance centre, or under the powers of the Immigration and Asylum Act 1999
 - is under the supervision of the probation services
 - is receiving a specified welfare service, namely the provision of support, assistance or advice by any person, the purpose of which is to develop any individual's capacity to live independently in accommodation or support their capacity to do so
 - is receiving a service or participating in an activity for people who have particular needs because of their age or who have any form of disability
 - is an expectant or nursing mother living in residential care
 - is receiving direct payments from a local authority or health and social care trust in lieu of social care services, and/or requires assistance in the conduct of their affairs

This procedure applies to all children under 18 years old or any adult at risk over 18 years old.

Responsibilities

In pursuit of these aims, the Directors will approve and annually review the Safeguarding Children and Adults at Risk Policy with the aim of:

1. raising awareness of issues relating to the welfare of children and adults at risk and the

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promotion of a safe environment for the children and adult at risk learning within the Community Matters

2. aiding the identification of children and adults at risk of significant harm, and providing procedures for reporting concerns
3. establishing procedures for reporting and dealing with allegations of abuse against members of staff
4. ensuring that all adults who have access to students have been checked through the Disclosure and Barring Service (DBS), as to their suitability and that serious concerns are reported to the DBS
5. providing an environment in which learners feel safe, secure, valued and respected and know that they will be listened to

In developing the policies and procedures, the Board of Directors will consult with, and take account of, guidance issued by the relevant government departments and other relevant bodies, and groups including the local safeguarding partnerships.

Community Matters will work closely with the three partners – health, police and social services. We will refer concerns that a child or adult at risk might be at risk of significant harm to the appropriate agencies as agreed with the local safeguarding partnerships, e.g. Police, Social Services.

Community Matters will notify the appropriate agencies if there is an unexplained absence of a child who is the subject of a Child Protection Plan.

Community Matters will co-operate as required by relevant agencies with their enquiries regarding child protection matters, including attendance at case conferences and core groups.

All staff working with children will receive adequate training to familiarise themselves with child protection issues and responsibilities and Community Matters procedures and policies, with safeguarding training at induction and regular updates at least annually. Designated Safeguarding Leads undertake formal multi-agency training every two years in line with statutory guidance. Cudana Guner-Moss has special responsibility for child protection issues and is the Designated Safeguarding Lead for the organisation (cudana.guner-moss@communitymatters.co.uk)

Additionally, Murat Ozcelik, Sule Kangulec and Sedat Ozcelik have also been trained as Designated Safeguarding Leads, and will act as such when Cudana Guner-Moss is absent.

The Designated Safeguarding Lead is responsible for ensuring organisational safeguarding practice reflects the requirements of Keeping Children Safe in Education (KCSIE) 2025, including staff awareness, referral processes, early help, and inter-agency working.

Community Matters will inform the Department for Education (DfE) if the organisation becomes subject to an investigation by the local authority or the police. This requirement applies only to safeguarding incidents where the organisation or one of its sub-contractors is under investigation.

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Allegations against staff

All allegations of abuse of adults by those who work with them must be taken seriously. Allegations against any person who works with adults, whether in a paid or unpaid capacity, cover a wide range of circumstances.

This procedure should be applied when there is such an allegation or concern that a person who works with adults, has:

- behaved in a way that has harmed an adult, or may have harmed an adult,
- possibly committed a criminal offence against or related to an adult,
- behaved towards an adult in a way that indicates he or she may pose a risk of harm,
- behaved or may behave in a way that indicates they may not be suitable to work with adults.

The last bullet point above includes behaviour that may have happened outside an organisation that might make an individual unsuitable to work with adults, this is known as transferable risk.

An allegation can relate to an adult's behaviour outside work, and their relationships with others, if they:

- have behaved in a way in their personal life that raises safeguarding concerns. These concerns do not have to directly relate to an adult but could, for example, include an arrest for the possession of a weapon.
- have, as a parent or carer, become subject to child protection procedures.
- are closely associated with someone in their personal lives (e.g. partner, member of the family or other household member) who may present a risk of harm to adult/s for whom the adult is responsible in their employment/volunteering. That indicates they may pose a risk of harm to adults with care and support. For example, this may include situations where a person is being investigated by the police for domestic abuse to a partner, and undertakes voluntary work with adults with care and support needs.
- have behaved (or is alleged to have behaved) towards children in a way that indicates that they may pose a risk of harm to adults with care and support need. For example, this may include situations where a person is alleged to have abused a child, and is a student undertaking professional training to work with adults with care and support needs.
- are the subject of a formal safeguarding enquiry into allegations of abuse or neglect which have occurred in one setting. However, there are also concerns that the person is employed, volunteers or is a student in another setting where there are adults with care and support needs who may also be at risk of harm.

When a person's conduct towards an adult may impact on their suitability to work with, or continue to work with children, this must be referred to the local authority's designated officer (LADO).

If concerns arise about the person's behaviour in relation to their own children, the Police

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and/or Children's Social Care must consider informing the employer / organisation in order to assess whether there may be implications for children with whom the person has contact at work / in the organisation, in which case this procedure will apply.

Allegations of historical abuse should be responded to in the same way as a contemporary concern. In such cases, it is important to find out whether the person against whom the allegation is made is still working with adults and if so, to refer to the Local Authority Designated Officer. Decisions regarding informing the person's current employer or voluntary organisation should be made in consultation with the LADO.

Monitoring and review

Safeguarding is a fundamental priority within inspection and organisational governance. Community Matters ensures effective safeguarding arrangements are in place by maintaining a strong culture of vigilance, ensuring learners feel safe, identifying concerns early, providing appropriate staff training, and responding promptly and proportionately to safeguarding incidents.

Safeguarding arrangements are regularly reviewed against statutory guidance, including Keeping Children Safe in Education (KCSIE) 2025, Working Together to Safeguard Children 2023, and relevant adult safeguarding legislation to ensure practice remains current and effective.

Community Matters must ensure that the Board of Directors have a good oversight of the implementation of this policy, and undertakes that:

1. all procedures and policies are consistent with current safeguarding practice
2. it reviews the Safeguarding Children and Adults at Risk policy annually
3. it ensures all senior managers and Board of Directors are informed of how the organisation and its staff have complied with the policy, including but not limited to, a report on the training that staff have undertaken.

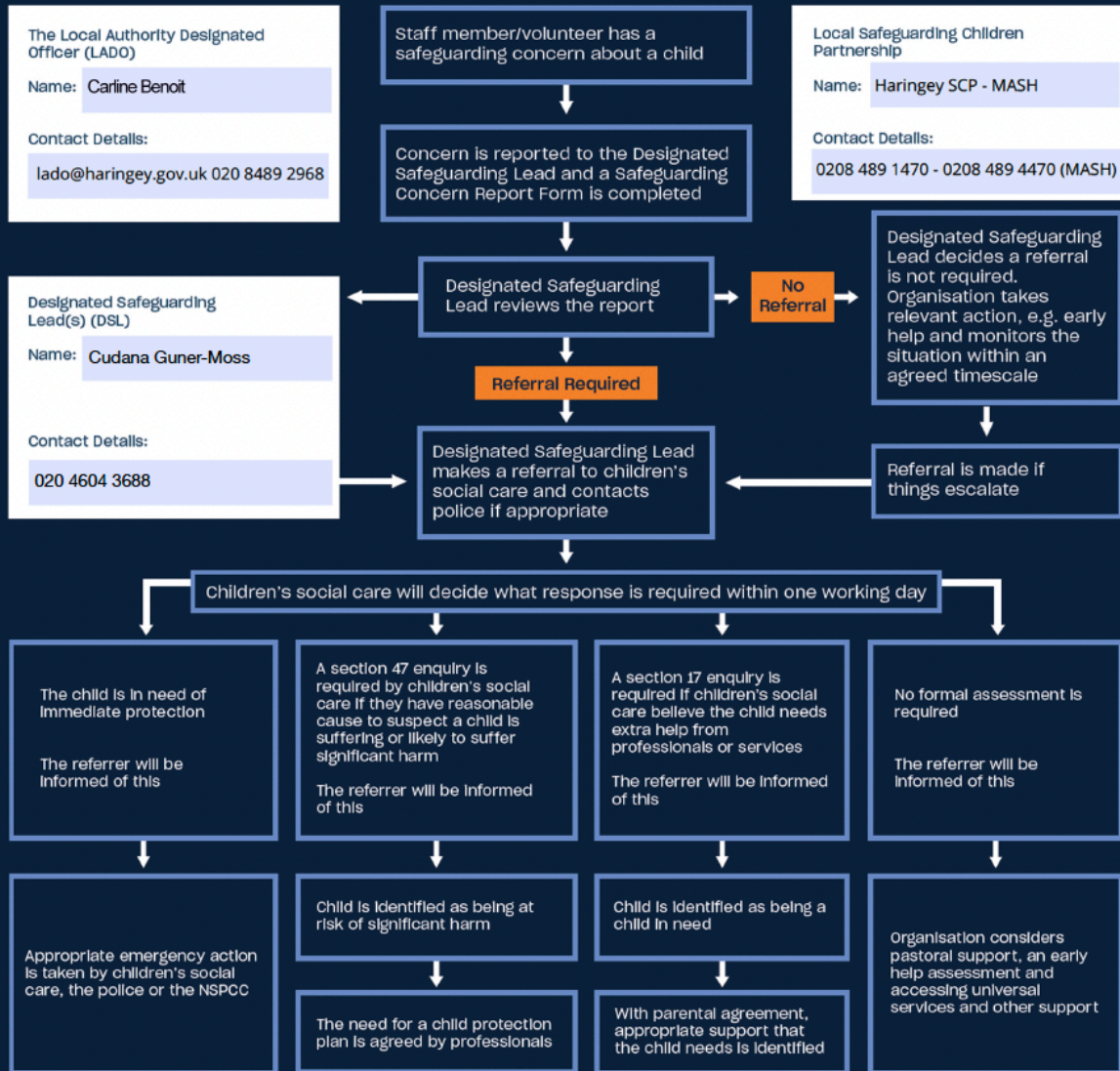
Flowchart of procedures for responding to safeguarding concerns

Please see the next page to view the flowchart.

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Flowchart of procedures for responding to safeguarding concerns



All concerns and correspondence will be kept in a secure, confidential file. The child's circumstances will be kept under review at all stages and a referral will be made again if needs be. The child's best interests must always come first.

If the concern is about a staff member/ volunteer in your organisation, the DSL should refer this to the LADO who will determine the best route of action to be taken.

If your concern would involve a Prevent/Channel referral, contact:
prevent@haringey.gov.uk

If you have a concern that a child has undergone, or is about to undergo, FGM, contact:
020 8489 4470 (MASH)