Safeguarding Policy and Procedure

Item	Details
Policy owner	Matt Malkin
Position	Managing Director
Designated Safeguarding Lead	Matt Malkin
Deputy Safeguarding Lead	Kirsty Noble
Version	Version 2
Applies to	Learners and Staff
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1. Purpose and Scope

The purpose of this policy and procedure is to promote wellbeing, prevent harm and respond effectively where safeguarding concerns are raised. Skills-UK is committed to safeguarding children, young people and adults at risk from abuse, neglect, exploitation, radicalisation and harm while they are engaged with Skills-UK provision or services.

This policy applies to all Skills-UK staff, directors, volunteers, contractors and others working on behalf of Skills-UK. It must be followed whenever a concern, allegation, disclosure or incident involves a child, young person or adult at risk.

- Safeguarding is everyone's responsibility.
- The welfare and wellbeing of children, young people and adults at risk must be considered in all Skills-UK activity.
- All individuals have the right to equal protection from harm regardless of age, disability, gender, race, religion or belief, sexual orientation, pregnancy or maternity, marital status, gender reassignment, culture, language, immigration status or personal circumstances.
- Concerns must be acted on promptly and recorded accurately.

2. Legal and Statutory Framework

This policy is informed by relevant legislation and statutory guidance, including but not limited to:

- Care Act 2014 and Care and Support Statutory Guidance.
- Children Act 1989 and Children Act 2004.
- Working Together to Safeguard Children 2026.
- Keeping Children Safe in Education 2026, where applicable.
- Information Sharing to Safeguard Children and Young People (2026).
- Safeguarding Vulnerable Groups Act 2006.

- Counter-Terrorism and Security Act 2015 and Prevent Duty Guidance: England and Wales (2023).
- Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025.
- Equality Act 2010.
- Human Rights Act 1998.
- Modern Slavery Act 2015.
- Sexual Offences Act 2003.
- Domestic Abuse Act 2021.

 Mental Capacity Act 2005.

3. Adult Safeguarding under the Care Act 2014

This policy reflects statutory guidance issued under the Care Act 2014. Adult safeguarding means protecting an adult's right to live in safety, free from abuse and neglect. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while making sure the adult's wellbeing is promoted and their views, wishes, feelings and beliefs are taken into account.

Skills-UK adopts the six Care Act safeguarding principles:

Principle	Meaning in Skills-UK practice
Empowerment	People are supported and encouraged to make their own decisions and give informed consent.
Prevention	It is better to take action before harm occurs.
Proportionality	The least intrusive response appropriate to the risk presented should be used.
Protection	Support and representation should be available for those in greatest need.
Partnership	Local solutions should be delivered through services working with their communities.
Accountability	There should be accountability and transparency in safeguarding practice.

4. Definition of an Adult at Risk

For the safeguarding duty to apply under the Care Act 2014, the adult must meet all three criteria below:

- The adult has needs for care and support, whether or not the local authority is meeting any of those needs.
- The adult is experiencing, or is at risk of, abuse or neglect.
- As a result of their care and support needs, the adult is unable to protect themselves from either the risk of abuse or neglect or the experience of abuse or neglect.

An adult may have care and support needs because of age, disability, mental health, physical health, learning disability, sensory impairment, substance misuse, frailty, homelessness, domestic abuse, exploitation, trauma or other personal circumstances. Staff must not assume that an adult is or is not at risk based on appearance, age, diagnosis or employment status alone.

5. Multi-Agency Partnership Arrangements

Skills-UK recognises that safeguarding is most effective when agencies work together. Skills-UK will cooperate with local safeguarding partnership arrangements and relevant statutory, voluntary and community organisations to share information, seek advice and make referrals where required.

This may include working with:

- Local Authority Adult Safeguarding Teams and Adult Social Care.
- Local Authority Children's Social Care and Multi-Agency Safeguarding Hubs.
- Police, including emergency response where there is immediate danger.
- NHS services, mental health services, GPs and hospitals.
- Domestic abuse, sexual violence and exploitation services.
- Probation, Youth Justice and criminal justice agencies.
- DWP, Jobcentre Plus, employment support providers and funders where relevant.
- Voluntary and community sector support organisations.
- Education and Skills Funding Agency or other funders where notification is contractually or legally required.

Skills-UK will share safeguarding information lawfully, proportionately and on a need-to-know basis. Consent should be sought where appropriate, but concerns may be shared without consent where there is risk of significant harm, serious crime, coercion, public interest, risk to others or where seeking consent would place a person at further risk.

6. Children, Young People and Adults at Risk: Rights and Safeguarding Principles

Children, young people and adults at risk have the right to protection from abuse, neglect, exploitation and harm. They must be valued, listened to, respected and involved in decisions wherever possible and appropriate.

Skills-UK will endeavour to safeguard children, young people and adults at risk by:

- Valuing, listening to and respecting them.
- Adopting safeguarding and child protection procedures and a staff code of conduct.
- Recruiting staff and volunteers safely and completing appropriate checks.
- Sharing information about safeguarding and good practice with learners, parents/carers where appropriate, staff and volunteers.
- Sharing information about concerns with agencies who need to know.
- Providing effective management through supervision, support, training and clear accountability.
- Making reasonable adjustments and ensuring equality of access and response.

7. Equality, Diversity and Individual Needs

Each learner is an individual with different experiences, circumstances, communication needs and perspectives.

Safeguarding action must take account of culture, language, disability, communication needs, neurodiversity, mental health, trauma, sex, sexual orientation, gender identity, religion or belief, race, age, socioeconomic circumstances and immigration status.

Particular attention must be paid to individuals with disabilities, learning difficulties or other additional needs, communication difficulties, English as an additional language, mental health difficulties, experience of domestic abuse, homelessness, exploitation or previous trauma. Staff must make reasonable adjustments to ensure individuals can communicate concerns and access support.

8. Confidentiality and Information Sharing

All matters relating to Skills-UK, learners and families are subject to clear standards of respect and confidentiality. However, safeguarding information must be shared with appropriate agencies and professionals where necessary to protect children, young people or adults at risk.

- Never promise to keep a safeguarding concern secret.
- Explain that information may need to be shared with people who can help.
- Only share information with those who need to know.
- Record clearly what has been shared, with whom, when and why.
- Refer to the Skills-UK GDPR/Data Protection Policy where required, but do not allow uncertainty about data protection to prevent necessary safeguarding action.

9. Roles, Responsibility, Authority and Accountability

Role	Responsibility and Limitations
All staff, volunteers and contractors	Remain alert to signs of abuse or neglect; listen to concerns; report concerns immediately to the DSL or Deputy DSL; record accurately; follow this policy; do not investigate; maintain confidentiality.
Line Managers	Ensure staff understand procedures; support staff to report concerns; pass safeguarding information to the DSL immediately; ensure records are completed; monitor safe practice in delivery.
Designated Safeguarding Lead - Matt Malkin	Lead safeguarding decision-making; receive and assess concerns; provide advice; make or oversee referrals; liaise with local authorities, police, funders and partner agencies; maintain secure records; identify themes and training needs.
Deputy Safeguarding Lead - Kirsty Noble	Act in the DSL's absence; provide advice and guidance; support referrals and recording; contribute to safeguarding monitoring and policy review.
Directors	Ensure Skills-UK has effective safeguarding governance, resources, training, safer recruitment, supervision and oversight. Directors are accountable for compliance with statutory, contractual and local safeguarding requirements.
Learners	Are encouraged to speak to a member of staff, DSL or Deputy DSL if they feel unsafe or are worried

Role	Responsibility and Limitations
	about someone else. Learners are not responsible for investigating concerns.

Staff must understand their limitations: they must not investigate, confront alleged perpetrators, make promises of confidentiality, delay reporting, or make decisions alone where a safeguarding threshold may be met.

10. Safer Recruitment

Skills-UK is committed to safer recruitment and will take reasonable steps to ensure staff and volunteers are suitable to work with learners, children, young people and adults at risk.

- Role descriptions will include safeguarding responsibilities where appropriate.
- Identity and right-to-work checks will be completed before appointment.
- At least two references will be sought where possible, including the most recent employer where appropriate.
- Employment history, gaps and relevant qualifications will be checked.
- DBS checks will be completed at the appropriate level for the role, including enhanced DBS checks where the role is eligible.
- DBS checks will be renewed in line with Skills-UK safer recruitment practice and contractual requirements, normally every three years, or staff may be required to maintain DBS Update Service registration where appropriate.
- Safeguarding declarations and suitability checks will be completed as part of recruitment and induction.
- Any concerns arising during recruitment will be risk assessed by senior leaders before appointment or continued engagement.

11. Staff and Volunteer Induction, Training and Supervision

All staff and volunteers must receive safeguarding information as part of induction before or at the start of their duties. This includes how to recognise concerns, how to respond to disclosures, how to contact the DSL and what records must be completed.

- All staff and volunteers must complete safeguarding induction before unsupervised activity with learners.
- All staff and volunteers must complete safeguarding training appropriate to their responsibilities before undertaking unsupervised activity with learners. Prevent training will also be completed where it is relevant to the person's role or Skills-UK's contractual or statutory responsibilities.
- All staff must complete annual safeguarding and Prevent refresher training.
- The DSL and Deputy DSL must complete appropriate designated safeguarding lead training. Formal training will be refreshed at least every two years, supported by relevant updates, briefings and continuing professional development between formal training events.
- Safeguarding will be included in staff supervision, team meetings, standardisation, quality assurance and performance review as appropriate.
- Volunteers, sessional staff and contractors must be briefed on reporting routes and must be supervised according to role and risk.

- Training records will be maintained and monitored by Skills-UK management.

12. Recognising Child Abuse and Significant Harm

Skills-UK currently works primarily with adult learners but may work with children or young people in the future. Staff may also become aware of concerns involving someone under 18 through their work.

A child is anyone who has not yet reached their 18th birthday. Child protection concerns include abuse, neglect, exploitation and circumstances in which a child is suffering, or is likely to suffer, significant harm.

Staff must remain alert to physical abuse, emotional abuse, sexual abuse and neglect. They should also be aware of concerns including child-on-child abuse, bullying and cyberbullying, sexual harassment, serious violence, county lines, criminal exploitation, child sexual exploitation, online abuse, radicalisation, forced marriage and female genital mutilation.

The examples in the table below are not exhaustive. Staff must report any concern about a child or young person immediately to the DSL or Deputy DSL and must not investigate it themselves.

Child abuse category	Definition
Physical abuse	May involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating, fabricating or inducing illness, or otherwise causing physical harm.
Emotional abuse	Persistent emotional ill-treatment that causes severe and adverse effects on emotional development, including conveying that a child is worthless, unloved, inadequate, threatened, silenced or exploited.
Sexual abuse	Forcing or enticing a child or young person to take part in sexual activities, including contact and non-contact activity, grooming, sexual exploitation and online sexual abuse.
Neglect	Persistent failure to meet a child's basic physical or psychological needs, likely to result in serious impairment of health or development.

Staff should also be alert to peer-on-peer abuse, bullying including cyberbullying, sexual harassment, serious violence, county lines, criminal exploitation, child sexual exploitation, online abuse, radicalisation, forced marriage and female genital mutilation.

13. Adult Safeguarding: Ten Categories of Abuse

Staff must be able to recognise all forms of abuse and neglect within adult safeguarding practice.

The examples below are not exhaustive.

Category	Definition	Possible indicators/signs
1. Physical abuse	Assault, hitting, slapping, pushing, misuse of medication, restraint, inappropriate physical sanctions or causing deliberate physical harm.	Unexplained injuries, bruising, burns, fractures, repeated accidents, fear of particular people, flinching, reluctance to seek medical help.

Category	Definition	Possible indicators/signs
2. Domestic abuse	Incident or pattern of controlling, coercive, threatening, degrading or violent behaviour between intimate partners or family members. Includes psychological, physical, sexual, financial and emotional abuse, honour-based abuse and forced marriage.	Fearfulness, isolation, partner/family member speaking for them, injuries, anxiety, missed sessions, lack of access to money/phone, controlling texts/calls.
3. Sexual abuse	Rape, sexual assault, sexual harassment, inappropriate touching, indecent exposure, sexual photography, sexual exploitation or sexual acts to which the adult has not consented or could not consent.	Disclosure, genital pain/injury, sexually transmitted infections, pregnancy, distress around certain people/places, withdrawal, changes in behaviour.
4. Psychological or emotional abuse	Threats, humiliation, intimidation, coercion, verbal abuse, cyberbullying, isolation, unreasonable control, harassment or deprivation of contact.	Low self-esteem, anxiety, depression, fearfulness, confusion, withdrawal, compliance, change in confidence or presentation.
5. Financial or material abuse	Theft, fraud, scams, coercion about money, misuse of property, benefits or bank cards, pressure relating to wills, property, inheritance or possessions.	Unpaid bills, missing money, lack of essentials, sudden debt, unexplained withdrawals, another person controlling money, anxiety about finances.
6. Modern slavery	Human trafficking, forced labour, domestic servitude, sexual exploitation, criminal exploitation and forced or compulsory labour.	No control over documents, fear, restricted movement, poor living conditions, working excessive hours, being transported by others, signs of coercion.
7. Discriminatory abuse	Harassment, slurs or unfair treatment because of age, disability, race, religion or belief, sex, sexual orientation, gender reassignment or other protected characteristics.	Derogatory comments, exclusion, fear, withdrawal, unequal access to services, repeated complaints, bullying or hate incidents.
8. Organisational abuse	Poor care or professional practice within an organisation, service or setting, including neglect, poor standards, rigid routines, lack of dignity or unsafe systems.	Repeated concerns, poor records, unsafe staffing, lack of privacy, institutional routines, complaints ignored, unsafe or degrading practice.
9. Neglect and acts of omission	Ignoring medical, emotional or physical care needs, failure to provide access to health, care, support, medication, nutrition, heating or safety.	Poor hygiene, weight loss, dehydration, untreated conditions, unsuitable clothing, missed medication, unsafe living conditions.

Category	Definition	Possible indicators/signs
10. Self-neglect	A person's behaviour that threatens their own health, safety or wellbeing, including neglect of personal hygiene, nutrition, health, environment or hoarding.	Poor personal care, malnutrition, untreated illness, hoarding, unsafe home, refusal of essential support, social isolation.

14. General Indicators, Signs and Symptoms of Abuse

Abuse may be a single act, repeated acts, poor practice, neglect, exploitation, failure to act or a pattern of controlling behaviour. Indicators do not prove abuse on their own, but they must be taken seriously and reported.

- Unexplained injury, bruising, burns, fractures, pain or repeated accidents.
- Sudden changes in mood, behaviour, attendance, confidence, appearance or communication.
- Anxiety, depression, fearfulness, withdrawal, tearfulness, anger or distress.
- Poor hygiene, weight loss, hunger, unsuitable clothing or untreated medical conditions.
- Missing possessions, unpaid bills, lack of money, sudden debt or financial control by another person.
- Reluctance to speak in front of a partner, family member, carer, peer or employer.
- Signs of coercion, control, intimidation, exploitation or fear of consequences.
- Frequent missed appointments, unexplained absences or sudden disengagement from learning.
- Isolation from friends, family, support services or community.
- Concerning online contact, grooming, cyberbullying, threats or sharing of images.
- Disclosure by the individual or by another learner, family member, professional or partner agency.
- Staff instinct that something is not right, even if the individual does not disclose.

15. Responding to a Disclosure or Safeguarding Concern: Staff Procedure

All staff and volunteers must follow the procedure below where a disclosure is made or a safeguarding concern is identified. Immediate safety takes priority over all other steps.

Step	Action required	Timescale
1. Listen and remain calm	Stop and listen. Take the concern seriously. Allow the person to speak freely. Do not appear shocked or dismissive.	Immediately
2. Reassure	Tell the person they have done the right thing by telling someone. Do not promise confidentiality. Explain that information may need to be shared with people who can help keep them or others safe.	Immediately
3. Do not investigate	Do not ask leading questions, confront the alleged perpetrator, examine injuries beyond what is needed for safety, or attempt a formal interview. Use open	Immediately

Step	Action required	Timescale
	prompts only, such as “Tell me what happened” or “Is there anything else you want to tell me?”	
4. Consider immediate risk	If the person is in immediate danger, requires urgent medical attention, a crime is in progress or there is immediate risk to life, call 999. Preserve evidence where possible.	Immediately
5. Report internally	Inform Matt Malkin, the DSL, or Kirsty Noble, the Deputy DSL, without delay. If neither is available and there is an immediate risk, contact emergency services or the relevant Local Authority safeguarding service and then inform a Director.	Immediately and same day
6. Record	Write a factual record using the cause for concern/incident form. Include date, time, location, names, exact words used where possible, observed injuries/behaviour, action taken and who was informed. Keep original notes.	As soon as possible and within 24 hours
7. DSL review	The DSL will review risk, consider consent, check whether a local authority, police, funder or other referral is required and agree immediate protective actions.	Same working day, or immediately for urgent concerns
8. Referral	Where the adult safeguarding threshold or another safeguarding threshold may be met, the DSL, Deputy DSL or authorised senior person will contact the relevant Local Authority safeguarding service or emergency service.	Immediately for urgent risk and normally within 24 hours
9. Follow-up	The DSL will monitor actions, record outcomes, liaise with agencies and ensure ongoing support for the learner and staff involved.	Ongoing until concern is closed or transferred

16. Recording and Safeguarding Records

For all safeguarding concerns, a written record with clear dates, times, names and actions must be started and kept up to date. Records must be factual, objective and stored securely with restricted access.

- Use the Skills-UK cause for concern or incident report form.
- Use a body map where there are visible injuries, ensuring this is factual and not investigative.
- Record the person's own words where possible.
- Record decisions, rationale, referrals, advice received, consent decisions and follow-up actions.
- Do not store safeguarding records in general learner files unless secure access controls are in place.
- Do not delay reporting because a form is incomplete.
- Safeguarding records must be retained in accordance with Skills-UK's retention arrangements and applicable legal, contractual and insurance requirements.

17. Local Authority Reporting Process

The DSL is responsible for ensuring that safeguarding incidents are reported to the relevant Local Authority where thresholds are met. The relevant Local Authority will normally be the authority for the area in which the adult lives. Where the correct referral route is unclear, the DSL or Deputy DSL will seek advice without delaying urgent protective action.

Assess whether there is immediate danger. Call 999 if urgent police or medical help is needed.

1. Speak with the person at risk where safe and appropriate, explain concerns and seek consent for referral where appropriate.
2. Do not seek consent if doing so would increase risk, delay urgent action, place others at risk, prevent detection of a crime or where the person lacks capacity for the decision.
3. Complete the internal safeguarding record and gather factual information.
4. Contact the relevant Local Authority safeguarding route for advice or referral.
5. Submit the relevant safeguarding concern form or telephone referral as required by the Local Authority.
6. Record the referral reference number, name of professional spoken to, advice received and agreed actions.
7. Inform funders, commissioners or regulators where required by contract, law or local procedure.
8. Continue to support the learner and cooperate with multi-agency enquiries.

18. Allegations Concerning Staff, Volunteers or Senior Staff

Allegations concerning colleagues are challenging, but safeguarding must always come first. Staff must remain open to the possibility that a member of staff, volunteer, contractor or senior leader may pose a risk.

- Allegation concerning a staff member or volunteer: report to Matt Malkin.
- Allegation concerning Matt Malkin: report to Kirsty Noble or another Director.
- Allegation concerning Kirsty Noble: report to Matt Malkin or another Director.
- Allegation concerning both safeguarding leads or a Director: follow the Whistleblowing Policy and contact the relevant Local Authority, police or other appropriate external authority.
- Do not alert the alleged perpetrator or investigate the matter yourself.
- Skills-UK disciplinary procedures may run alongside safeguarding, LADO, Local Authority or police processes.
- Records must clearly show actions, advice, decisions and outcomes.

Skills-UK will make a referral to the DBS where the legal referral conditions are met, including where a person has been removed from regulated activity, or would have been removed had they not left, because they harmed or posed a risk of harm to an adult.

19. Cumulative and Low-Level Concerns

Some concerns may not appear significant in isolation but may form part of a pattern. Staff must report accumulative, repeated or low-level concerns to the DSL so that information can be collated and risk can be properly assessed.

20. Online Safety

Skills-UK understands its responsibility to educate learners about e-safety and support safe, legal and appropriate use of the internet, digital platforms, email, social media, mobile phones and emerging technologies.

- Learners must tell staff immediately if they receive offensive, threatening, abusive or concerning online communication.
- The use of obscene, threatening, harassing, discriminatory or abusive language is not permitted and may be subject to Skills-UK disciplinary procedures or legal action.
- Skills-UK will support learners to understand online risks, including scams, grooming, exploitation, harassment, misuse of personal information, image-based abuse and unsafe contact.
- Staff must only capture, store or use photographs, recordings or learner work for authorised purposes and with an appropriate lawful basis. Learners must not photograph, record or distribute images of others without their knowledge and permission.
- Learners must not take or distribute photographs or videos of others without their knowledge and consent.
- Complaints of a safeguarding nature must be managed in line with safeguarding procedures.
- Emerging technologies will be risk assessed where relevant.

21. Prevent, Radicalisation and Extremism

Skills-UK recognises that vulnerability to radicalisation may constitute a safeguarding concern. Skills-UK will meet any Prevent responsibilities arising from legislation, commissioning arrangements or funding contracts.

Staff will receive training appropriate to their responsibilities so they can recognise concerns and respond proportionately where someone may be vulnerable to radicalisation or being drawn into terrorism.

Prevent concerns must be reported to the DSL immediately and recorded in the same way as other safeguarding concerns. The DSL will seek advice and make a referral through the appropriate local Prevent or Channel pathway where required.

22. Support for Learners and Staff

Skills-UK will seek to support individuals affected by safeguarding concerns, including those who disclose abuse, witnesses, learners who may have caused harm and staff receiving disclosures. Support may

include signposting, reasonable adjustments, referral to external agencies, risk assessment, safety planning and ongoing contact where appropriate.

23. Referral Contacts and Sources of Advice

In an emergency, call 999. Do not delay urgent action while trying to contact the DSL.

Contact/Agency	When to use	Details
Skills-UK DSL	Matt Malkin, Designated Safeguarding Lead	07975 831053 matt@skills-uk.co.uk
Skills-UK Deputy DSL	Kirsty Noble, Deputy Safeguarding Lead	Internal contact details
Emergency services	Police / ambulance / fire	999
Police non-emergency	South Yorkshire / West Yorkshire Police non-emergency route	101
NSPCC Helpline	Child protection advice	0808 800 5000
Ann Craft Trust	Safeguarding adults in organisations / advice and resources	0115 951 5400
Modern Slavery and Exploitation Helpline	Modern slavery advice and reporting	08000 121 700
National Domestic Abuse Helpline	Domestic abuse support	0808 2000 247
Samaritans	Emotional support	116 123
CQC	Concerns about regulated health or care services	03000 616161

24. Commissioners, Regulators and Funders

Where a safeguarding or Prevent concern is being investigated by the Local Authority, police or another statutory agency, Skills-UK will consider whether any funding partner, commissioner, prime contractor, awarding organisation, insurer or regulator must be notified. Information will only be shared where this is legally or contractually required, or otherwise lawful and necessary.

25. Related Policies and Documents

- Staff Code of Conduct;
- Safer Recruitment Policy and Procedure;
- Staff Code of Conduct;
- Whistleblowing Policy;
- Data Protection Policy;
- Equality, Diversity and Inclusion Policy;
- Health and Safety Policy;
- Complaints Policy;
- Risk Assessment Policy;
- Lone Working Policy;

- Staff Dignity at Work Policy;
- Prevent procedures and risk assessment;
- Safeguarding Concern Report Form;
- Body Map; and
- Safeguarding Training Records.

26. Review and Monitoring

This policy will be reviewed at least annually, or sooner if there are changes to legislation, statutory guidance, local safeguarding procedures, Skills-UK delivery activity, contracts or following a safeguarding incident or learning review.

Annex A - Quick Safeguarding Flowchart

Stage	Action
Concern, disclosure or allegation identified	Listen, reassure, do not promise confidentiality and ensure immediate safety.
Immediate danger or crime in progress?	Call 999 first, then inform DSL.
No immediate danger	Report to DSL or Deputy DSL immediately.
Record	Complete safeguarding record within 24 hours; keep original notes.
DSL decision	Assess risk, seek consent where appropriate, contact Local Authority/police/funder as required.
Referral needed	Refer immediately for urgent risk and normally within 24 hours where thresholds are met.
Follow up	Record outcomes, support learner/staff and monitor until closed or transferred.