

Safeguarding Children and Adults at Risk Policy

Policy Scope

This policy applies to all Young Enterprise employees, contractors and volunteers across England, Wales and Scotland. This policy is approved by our Health, Safety and Risk Committee (HSRC) and the Risk and Audit Committee of our Board of Trustees, and will be reviewed at least annually.

Where the term 'safeguarding' is used throughout this policy for the purpose of brevity and clarity, it should be understood to encompass both Child Protection in Scotland and Safeguarding Children in England and Wales. Where differences in legislation and processes exist between UK nations, these will be applied dependent on the country of residence of an individual and/ or the location of the delivery of Young Enterprise programmes and services as relevant.

YE Designated Safeguarding Leads

Designated Safeguarding Lead	Deputy Designated Safeguarding Leads
<u>England, Wales and Scotland</u> Katherine Gale , Head of Volunteering 07745 739241 (work hours) 07741 250122 (outside work hours/ no answer on work phone)	<u>England and Wales</u> Maggie Ayre , Head of Educational Partnerships 07918 561349 (work hours) 07899 984597 (outside work hours/ no answer on work phone)
	<u>Scotland</u> Julie Degnan , Head of Scotland Operations 07849 406718 (work hours) 07849406718 (outside work hours/ no answer on work phone)

The role of the Designated Safeguarding Lead (DSL) is to oversee safeguarding policy, process, practice and knowledge at YE, and to respond to any safeguarding incidents or concerns that may arise.

Their responsibilities are:

- managing and recording all safeguarding concerns
- making referrals to social care, police, disclosure and barring service (DBS) / Disclosure Scotland and others as relevant
- liaison with other agencies and organisations including schools and colleges
- implementing lessons learned from safeguarding incidents and concerns
- ensuring all our people have the relevant level of safeguarding training, skills and knowledge
- ensuring all our people are recruited safely and appropriately
- reviewing this safeguarding policy annually or sooner

The Deputy Designated Safeguarding Leads (DDSL) will be available to support or cover for the DSL. They will also handle any complaints or allegations against the DSL.

Policy Overview

Young Enterprise (YE) is committed to safeguarding children and adults at risk from harm and abuse..

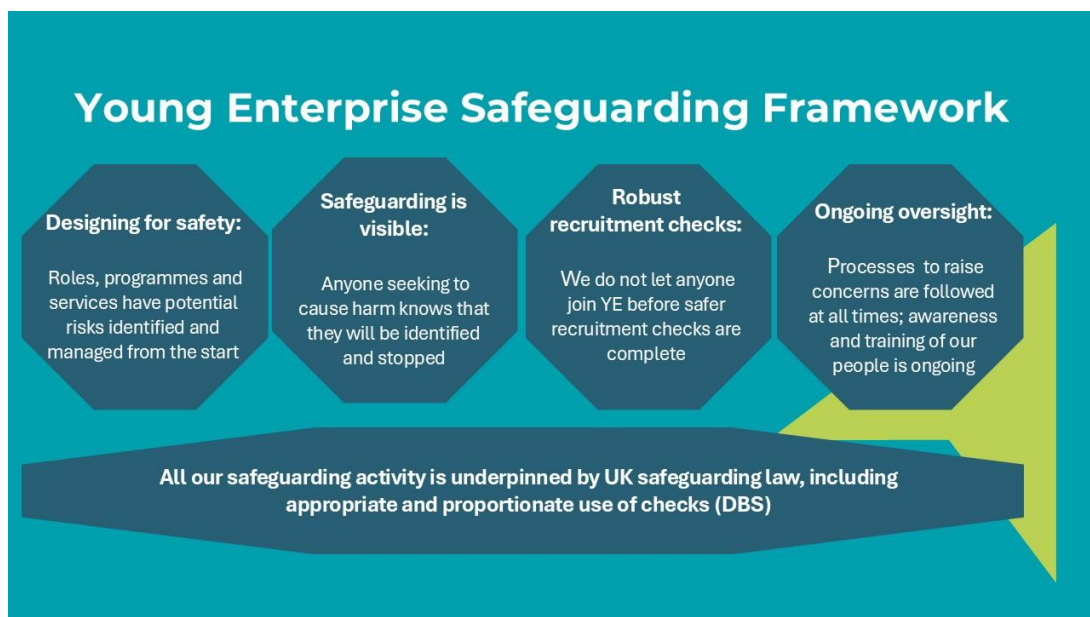
YE promotes best practice in safeguarding by:

- Ensuring all staff, contractors, and volunteers are carefully recruited, trained, and supported in line with UK safeguarding legislation;
- Addressing concerns promptly;
- Managing risks proactively;
- Continuously learning in response to safeguarding concerns.

We expect all our people and those we partner with to adhere strictly to this policy and associated safeguarding processes at all times. In the event of any concern, however small, about the welfare of any child or adult at risk, all YE employees, volunteers and contractors are expected to share those concerns, without delay, with the Designated Safeguarding Lead or the Deputy Designated Safeguarding Leads.

Our Safeguarding Framework

At YE we take a holistic approach to safeguarding of children and adults at risk:



Accountability for Safeguarding

The responsibility for Safeguarding at Board or Committee level is shared between members. Safeguarding is on the Charity's Risk Register. A senior member of the Charity at Board level has been appointed to take strategic responsibility for the organisation's safeguarding arrangements. This person is unconnected to the Designated Safeguarding Lead and the Deputy Designated Safeguarding Leads, and has up to date and relevant training in safeguarding.

Senior Lead Trustee for Safeguarding	Media enquiries in relation to safeguarding
Graham Farhall YE Trustee and Chair of the Risk and Audit Committee (RAC) Contact: CEO@y-e.org.uk	All media enquiries will be handled by Elsa Garey, Head of Marketing and Communications Contact: elsa.garey@y-e.org.uk

What is Safeguarding?

Safeguarding is the action that is taken to promote the welfare of children and vulnerable adults and protect them from harm and abuse.

YE believes that every young person has huge potential, and provides support, experiences and interventions to inspire and educate them to achieve that potential. However, no young person will reach their potential if they are not safe or are experiencing harm or abuse.

That is why safeguarding must always be our first priority – not only is it our legal duty as an organisation, but a strong safeguarding approach also means that our work with children and young people is as effective as it can possibly be.

All organisations working with children, adults at risk, parents, carers and/or families have responsibilities for safeguarding, and must have robust safeguarding policies and procedures in place.

Specifically, YE:

- has senior managers and Trustees accountable for safeguarding
- is clear that safeguarding is everybody's responsibility
- listens to children and adults at risk
- undertakes safer recruitment practices for all employees, contractors and volunteers
- take a risk management approach to the design of new programmes, services and roles
- has clear procedures for safeguarding children and adults at risk, as set out in this policy
- has procedures for dealing with allegations against, and concerns about, our employees, contractors and volunteers
- ensures safeguarding training forms part of the induction process and regular training programme for all our people, with additional annual refresher training for employees
- has clear safeguarding agreements and risk assessments in place when working with other organisations and partners, including undertaking appropriate due diligence

Definition of a child/young person

Although there is no single law that defines the age of a child across the UK, for the purposes of safeguarding policy and process within Young Enterprise **we define a child as anyone under the age of 18, until the date of their 18th birthday.**

This aligns with the UN Convention on the Rights of the Child, 1989, ratified by the UK government in 1991.

Definition of an adult at risk

There is no single law that defines an adult at risk across the UK. For the purposes of Safeguarding within Young Enterprise we define an adult at risk as a person aged 18 years or over, for their 18th birthday onwards- and in addition:

- has needs for care and support, and
- is experiencing, or is at risk of experiencing, abuse and neglect and
- as a result of those care needs, is unable to protect themselves from either the risk of, or the experience of abuse or neglect

Recognising Abuse in Children, Young People and Adults at Risk

Abuse can take many forms. In children and young people abuse includes:

- Bullying and cyberbullying
- Child sexual exploitation
- Child trafficking
- Criminal exploitation and gangs
- Domestic abuse
- Emotional abuse
- Female genital mutilation
- Grooming
- Neglect
- Non-recent abuse
- Online abuse
- Physical abuse
- Sexual abuse

Further details on each of these types of child and young people abuse can be found on the [NSPCC](#) website.

In adults at risk abuse includes:

- Physical abuse
- Psychological abuse
- Financial or Material abuse
- Sexual abuse
- Neglect & Acts of Omission
- Organisational Abuse
- Self Neglect
- Domestic abuse
- Modern Slavery
- Discriminatory Abuse

Further details about each of these types of abuse of adults at risk can be found on [Social Care Institute of Excellence \(SCIE\)](#) website.

What else might be of concern?

A child, young person or adult at risk who:

- is becoming secretive about where they are going to or who they are meeting
- will not let you see what they are accessing online
- is using a webcam in a closed area, away from other people
- is accessing the web or using a mobile for long periods and at all hours
- clears the computer history every time they use it
- receives unexpected money or gifts from people they don't know
- does not appear to have the money they should have

Alternatively, a person who:

- befriends a child, young person or adult at risk on the internet or by text messaging
- has links to children, young people and/or adults at risk on their social media pages especially if they work in a position of care such as a sports coach or care worker
- is secretive about what they are doing and who they are meeting

Online Safety (eSafety)

Modern digital technology has made access to information and communication increasingly easy for everyone, and therefore there are significant risks online for children and adults at risk, including:

- receiving or sending unwanted or upsetting texts, e-mail messages or images.
- being “groomed” by another with a view to meeting the child, young person or adult at risk for their own illegal purposes including sex, drugs or crime.
making, editing and sharing explicit images of children and adults at risk
- viewing or sending unacceptable material such as inciting hatred or violence.
- sending bullying messages or posting malicious details about others.
- overspending on shopping and gambling sites.
- inappropriate relationships or prostitution.

Because of the complex nature of the internet, where harm and abuse can cross countries and continents, there are particular referral pathways for eSafety concerns. Please see Appendix 1: eSafety Referral Flowchart for specific guidance.

Responding to disclosures and concerns

A disclosure is the process by which children and adults at risk start to share their experiences of abuse with others. A disclosure might look like someone telling you:

- they have or are being abused
- they have concerns about someone else
- they are themselves abusing or likely to abuse someone else

When a disclosure is made it is important to remember to:

- take what you are being told seriously
- stay calm and reassure
- never promise to keep it secret
- do not further investigate, but record key information of anything you are told or observe, with the date and your signature
- report your concern without delay and always contact the police if someone is in immediate danger
- always speak directly to YE's the DSL or DDSL .

Safeguarding responsibilities when responding to concerns

All our people at YE have a duty to report any safeguarding concerns or disclosures they encounter in the course of their role. If ever in any doubt, it is your responsibility to report it directly to the YE DSL and DDSL immediately.

Once you have followed the four steps outlined above, you have fulfilled your responsibility, and accountability for YE's ongoing response sits with the DSL and DDSL.

Depending on the nature of the concern, the DSL may report the incident to external bodies such as the police, the relevant local authority social services, and the Disclosure and Barring Service (DBS)/ Protection of Vulnerable Groups (PVG) Scheme. It is YE's policy that all concerns regarding a YE employee, contractor or volunteer will always be reported to the local authority as a matter of course prior to any internal investigation happening.

The DSL will also report the safeguarding concern and its outcome to the HSRC and Risk and Audit Committee. In the event of a serious safeguarding incident, the Board of Trustees may also have a duty to refer YE to the Charity Commission/ OSCR in Scotland. The DSL will also ensure that any lessons learned from safeguarding concerns are used to inform improvements to our ongoing safeguarding practice, policy and procedure at YE.

With regards to staff disciplinary and grievance procedures, we will take no steps until we have fully discussed and agreed a strategy with either the educational institution Designated Safeguarding Lead, social care services and/or the Police. Any safeguarding investigation will override the need to implement any such procedures until concluded.

Issues relating to volunteers will be dealt with according to our Volunteer Issue Resolution policy and procedure. Issues relating to contractors will be managed under the terms of their formal agreement with Young Enterprise.

Confidentiality, information sharing, record keeping and data protection

At all times when required, and especially where there is a safeguarding concern, we are committed to keeping records and sharing information which is:

- recorded on a safeguarding incident form, which can be found in the Safeguarding folder on SharePoint or provided by the DSL when an incident occurs
- of sufficient detail to identify the individual who is subject of concern and any significant others
- accurate, factual and non-judgmental
- timely (within 24 hours)
- signed and dated by the writer and co- signed by the DSL or DDSL
- shared and stored safely and securely as appropriate by the DSL or DDSL

Where personal data is required to be processed according to this policy, that processing activity must be undertaken in accordance with our data protection policy.

Data protection is not a barrier to sharing concerns about a child or an individual at risk. Always be open and honest about what you will do with the information. You should make a note in the safeguarding report of any express wish not to share the information but should not let this prevent you from sharing.

Lawful basis for processing information

Reliance on consent for processing personal data is not always appropriate for the following reasons:

- consent to the processing cannot be given by the data subject

- the controller cannot reasonably be expected to obtain the consent of the data subject to the processing
- the processing must be carried out without the consent of the data subject because obtaining the consent of the data subject would prejudice the provision of the protection mentioned (safeguarding of children and individual at risk; safeguarding of economic well-being of certain individuals)

In the circumstances mentioned above, in order to comply with our duty of care and safeguarding, we would process information raising safeguarding concerns and share them with relevant authorities when required, under the following lawful basis:

- a. Where an individual's life may be at risk we may process the data according to the UK GDPR Article 6(d) and GDPR Article 9 (c) where such processing is vital to the individual's life, and/or Art 10 UK GDPR supported by DPA 2018 Schedule 1, Part 2 paragraph 18 Safeguarding of children and of individuals at risk and/or paragraph 19 Safeguarding of economic well-being of certain individuals
- b. Where an individual or child is at risk – UK GDPR Article 6(f) legitimate interest, Article 9(g), substantial public interest, Art (10) UK GDPR, supported by DPA 2018 Schedule 1, Part 2 paragraph 18 Safeguarding of children and of individuals at risk
- c. Where an individual is at economic risk – UK GDPR Article 6(f) legitimate interest, Article 9(g) substantial public interest, Art 10 UK GDPR, supported by DPA 2018 Schedule 1, Part 2 paragraph 19 Safeguarding of economic well-being of certain individuals

When the above conditions are relied upon, an Appropriate Policy Document is required.

Data subjects' rights and other UK GDPR provisions may be restricted when concerning personal data processed in the circumstances described above. Restrictions on the data subjects' rights may be permitted by the exceptions included in the articles of the individual rights (UK GDPR) or by one of the exemptions included between Schedule 2 and 4 of the DPA 2018.

Examples of exemptions that might apply in the circumstances of safeguarding are the following:

- Schedule 2, Part 1, paragraph 2 (crime and taxation)
- Schedule 2, Part 3 (right of others)
- Schedule 3 – Part 5 (child abuse data)

Exceptions and exemptions are applied on a case by case basis.

Records of such processing must be kept to account for the action taken. The principles of the UK GDPR must be observed at all times.

Minimising the Risks

To minimise the safeguarding risks to children and adults at risk, Young Enterprise has certain practices and procedures that we undertake:

- **Photography & Filming Guidance**

Any images or films taken must be conducted in accordance with the Young Enterprise Photography and Video Consent Policy.

- **Buildings and Venues**

Risk assessments, which include safeguarding, will be carried out on all buildings and venues used by our organisation or by the host's venue management, such as schools.

- **Safer Recruitment**

For **employees and contractors** we currently do this by:

- advertising vacancies with a clear commitment required to safeguarding
- assigning all posts detailed job descriptions
- when a candidate is selected for interview the relevant criminal declaration form is sent for completion as set out by the Rehabilitation of Offenders Act 1974.
- always taking up two written references, one from the most recent employer or education establishment
- undertaking all interviews based on the job description, including a safeguarding question for all roles
- having sound procedures and recording for interviewing to ensure we are satisfied, and can evidence that the applicant is appropriate and suitable

Any appointment will only be confirmed subject to:

- satisfactory ID checks
- any relevant criminal records check (DBS/ PVG) at the appropriate level, including Certificate of Good Conduct for foreign nationals and the [International Child Protection Certificate](#) (ICPC) for anyone who has lived in the UK and also travelled overseas
- a follow up of written references by telephone if relevant to the vacant post
- a check of essential qualifications
- confirmation of the Right to Work in the UK for employed personnel

For **volunteers** we currently do this by:

- advertising roles with a clear commitment required to safeguarding
- requiring a Criminal Records Declaration form for all volunteers who need to disclose a criminal record
- an integrated safeguarding question on the volunteer application form for all volunteer roles
- any relevant criminal records check (DBS/PVG) at the appropriate level, including Certificate of Good Conduct for foreign nationals and the [International Child Protection Certificate](#) (ICPC) for anyone who has lived in the UK and also travelled overseas

- **Induction and Training**

All employees, volunteers and contractors must undertake safeguarding training before having contact with young people or adults at risk within their roles, which is completed at least every three years. In addition, all YE employees undertake annual safeguarding refresher training.

When needed, employees will receive further safeguarding training, at the appropriate level, as soon as possible, including additional Safeguarding Training for DSL roles and the Safeguarding Trustee.

Staff and contractors working directly with at risk groups will undertake the free online government training for [PREVENT](#). This is recommended, but not mandatory, for volunteers supporting at risk groups.

- **Working Practices**

Staff Ratios to Children, Young People and Adults at Risk

There must always be a minimum of two responsible adults present for any activities. A

responsible adult is defined as a Young Enterprise employee, Young Enterprise Volunteer, Young Enterprise contractor (all with both a valid DBS check and safeguarding training completion), or a member of staff associated with the educational institution in which the activity is conducted or linked to.

Lone and One to One Working/Volunteering

We will avoid lone working/volunteering of YE employees, contractors and volunteers wherever possible, and do not allow unsupervised one to one working/volunteering with children and adults at risk to protect both parties.

- **Events**

From time to time Young Enterprise events take place within publicly accessible venues in local communities; for example trade fairs and competitions within YE's Company Programme.

Young people aged under 16 must always be accompanied by at least one staff member under all circumstances. Young people aged 16 or over (Yr 12 and above) may attend events unaccompanied by responsible adults only under the condition that the [Safeguarding Risk Assessment](#) has been completed and returned to YE by the relevant educator in advance of the event.

Lone working/ volunteering expectations at events remain unchanged regardless of the age of the young people concerned. It is not considered lone working or volunteering to act in support of young people when within public areas at events. It would be considered lone working, for example, in a room separate from others, or when travelling in private transport to and from event venues where there is one adult alone with a young person or group of young people.

- **Young People within YE**

All young people under 18 who are undertaking volunteering, apprenticeships or work experience within our organisation are to be included within this policy and their safeguarding as individuals given the same importance as all young people we come into contact with. Any disclosures, observations of possible harm or concerning behaviour must be reported to the DSL or DDSL immediately.

They will also require an induction programme that includes awareness of our commitment to safeguarding within the remit of the Safeguarding Policy and in line with staff inductions. They will be provided with a key contact within Young Enterprise (this will normally be the member of staff responsible for them during their time within the organisation) and the contact information of the Designated Safeguarding Lead and Deputy Designated Safeguarding Lead. They will be made aware that any/all of these contacts can be approached should there ever be any concern. Emergency contact details for next of kin will be required from any young person working or volunteering with Young Enterprise in addition to a safeguarding risk assessment signed off by the DSL for the activity they will be undertaking within their role. These will be stored confidentially and deleted in line with our data retention policy.

We will check with the relevant local authority's education welfare team to see if an employment permit is required for any young people working or volunteering with us.

- **Safeguarding Code of Conduct**

Young Enterprise aims to provide a safe environment free from discrimination, upholding and promoting equality, diversity and inclusion. All staff, contractors and volunteers for Young

Enterprise undertake to:

- ✓ treat all children and young people and adults at risk with respect and dignity
- ✓ ensure that their welfare and safety is paramount at all times
- ✓ maintain professional boundaries both face to face and when using technology
- ✓ always listen to individuals and take account of their wishes and feeling
- ✓ always act in a professional way and not accept bullying, swearing or other disruptive behaviour
- ✓ avoid use of physical contact at all times
- ✓ avoid being alone with children, young people and adults at risk
- ✓ listen to, and act upon, any disclosures, allegations, or concerns of abuse
- ✓ participate in approved safeguarding training at appropriate levels
- ✓ follow our safeguarding policy at all times
- ✓ make activities FUN and enjoyable

- **YE's Rules of Virtual Engagement**

Governing digital call (MS Teams, Zoom & similar) interaction between staff, volunteers, and contractors with young people are intended to mitigate such risks:

1. The date/time for the session will be agreed in advance between staff/volunteer & the school/centre
2. The school's recognised & authorised representative will use their system access information/email details to set-up/convene the call
3. The representative will be in attendance on the call throughout the duration
4. There will be no direct contact between the staff/volunteer & young people outside the supervised medium of the call

Policy Date

This policy was agreed and disseminated on 1 October 2025 and will be reviewed annually or when there are substantial organisational changes.

Date of next review: September 2026

Appendix 1: eSafety Referral Flowchart

