


COMPASS

Safeguarding Policy



Version 8
09-05-2025

COMPASS

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Policy Approved by:	Yolande Kalinics
Signed:	
Approved by the Governing Body:	TBC

Policy Review Record		
V3	13/03/2022	Reviewed by D. Williams, roles and responsibilities updated, and format of policy changed to Compass company policy format.
V4	08/03/2023	Policy updated to include the responsibilities of the governing body.
V5	11/09/2023	Policy amended to identify Felicity Stevenson as safeguarding deputy.
V6	08/04/2024	Policy reviewed and amended by Felicity Stevenson as the new DSL with new format.
V7	23/10/2024	Policy reviewed and amended by Kenneth Caswell as the new deputy DSL with new format.
V8	09/05/2025	Policy reviewed and amended by Yolande Kalinics to identify Yolande Kalinics as the new DSL. Monday.com Link to Safeguarding Reporting added to page 11

1.0 PURPOSE

The purpose of this document is to set out Compass' policy for the safeguarding of children, and any adults who may be considered vulnerable. Compass aims to adopt the highest possible standards and to take all reasonable steps in relation to the safety and welfare of all people in the course of our work. This policy aims to ensure that all children, young people, adults at risk of harm and those who work with them are safe and supported at Compass.

This policy is based on and incorporates elements of the following legislation, national and local guidance documents:

- Keeping children safe in education 2024
[Keeping children safe in education 2024.pdf](#)
- Safeguarding Vulnerable Groups Act 2006
[Safeguarding Vulnerable Groups Act 2006](#)
- Protection of Freedoms Act 2012
[Protection of Freedoms Act 2012](#)
- Care Act 2014
[Care Act 2014](#)
- Children Act 2004
[Children Act 2004](#)
- Working Together to Safeguard Children 2024
[Working together to safeguard children - GOV.UK](#)
- Disclosure and Barring Service guidance documents.
[About us - Disclosure and Barring Service - GOV.UK](#)

2.0 SCOPE

This policy applies to all members of staff at Compass, third party employees, associates, learners and volunteers who in the course of their duties, whilst on Compass business, may have contact with children (i.e., individuals under 18 years old) or adults at risk of harm.

The people to whom this Policy applies are described collectively in the rest of this document as 'Compass'.

3.0 DEFINITIONS

Safeguarding

For the purpose of this policy, safeguarding means protecting the health, wellbeing and human rights of individuals at risk, enabling them to live safely, free from abuse or neglect.

Safeguarding children

Safeguarding children is further defined as:

- Protecting children from maltreatment;
- Preventing impairment of children's health and development;
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care;
- Taking action to enable all children to have the best outcomes.

Adults at risk of harm

- Protecting the rights of adults to live in safety, free from abuse and neglect
- People and organisations working together to prevent and stop both the risks and experience of abuse or neglect
- People and organisations making sure that the adult's wellbeing is promoted including, where appropriate, taking fully into account their views, wishes, feelings and beliefs in deciding on any action
- Recognising that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances and therefore potential risks to their safety or well-being

Young person/young people

A person who is aged 16-17, but for the purpose of this policy will come under the definition of a child.

Abuse

Abuse is a violation of a person's human and civil rights by another. There is no exhaustive list of what may constitute abuse or exploitation, but includes:
A single or repeated act of any scale which causes harm;
Neglect or omission on the part of someone with caring responsibilities.

4.0 ROLES & RESPONSIBILITIES

Safeguarding

Safeguarding is everyone's responsibility at Compass. We all have a role to play in keeping ourselves and each other safe and have a duty to act if we are concerned for the wellbeing of another, whether on Compass premises or not. The following structures are in place to support everyone at Compass with this responsibility:

The Designated Safeguarding Lead has been appointed by the Governing Body and is responsible for all safeguarding concerns at Compass, and responsible for overseeing the management of safeguarding issues. They are also responsible for overseeing the training of safeguarding officers and other staff members as necessary, developing and reforming the safeguarding policy, attending any external meetings to represent safeguarding with Compass.

Designated Safeguarding Lead: Yolande Kalinics

Designated Safeguarding Officers are responsible for providing localised safeguarding advice and support as well as supporting the Designated Safeguarding Lead to ensure appropriate risk assessments are in place for relevant activities and monitoring the welfare of staff or students under the age of 18, in accordance with Keeping Children Safe in Education 2024 and ensuring that all safeguarding concerns are reported to the Designated Safeguarding Lead.

Designated Safeguarding Officers: Kenneth Caswell, Debbie Williams.

All staff have a responsibility to report any concerns about a learner or client's wellbeing to a safeguarding officer and to help foster a safe and inclusive environment for all adults and young people. All safeguarding concerns will be documented and reported to the safeguarding board on Monday.com.

5.0 GUIDING PRINCIPLES OF SAFEGUARDING

Compass applies the following core principles to safeguarding:

People who have regular contact, as part of their work or studies, with children or adults who may be vulnerable, should:

- Ensure they understand the implications of this Policy.
- Have regular safeguarding training.
- Be responsible for their own actions and behaviour and avoid any conduct which could lead any reasonable person to question their motivation and intentions.

A safeguarding concern should never go unreported. Compass take all safeguarding concerns seriously and will report concerns promptly. If there is immediate risk of harm to an individual, ring the Police on 999.

Any information relating to safeguarding concerns shall be handled in accordance with the Data Protection Act 2018 (GDPR). There may be occasions where a safeguarding concern is shared without the consent of the individual, as obtaining consent could place an individual at increased risk of harm or it could undermine the investigation, prevention, detection or prosecution of a serious crime.

Compass implement a risk-based approach to the development of policy and practice around safeguarding. Areas deemed to be of higher risk are outlined below and form the 'core' of Compass' safeguarding approach:

- Disclosure and Barring (DBS) checking for clinical staff, subcontractors and tutors who may work with learners under the age of 18;
- Enrolments of people under 18 years;
- Dealing with suspicions or allegations of abuse.

6.0 DISCLOSURE AND BARRING (DBS) AND RECRUITMENT

The Disclosure and Barring Service (DBS) helps organisations identify candidate who may be unsuitable for certain types of work, particularly work involving contact with children, young people and adults at risk of harm.

6.1 LEVELS OF DISCLOSURE

Standard check – checks undertaken include spent and unspent convictions / cautions held of the Police National Computer. This type of check is suitable for positions not working with children or adults at risk of harm.

Enhanced check – checks undertaken include spent and unspent convictions/ caution held on the Police National Computer plus information held locally by Police which is considered to be 'reasonably relevant' to the post. This type of check is suitable for positions with supervised activities with children which would be classified as 'regulated activity' if unsupervised; infrequent activities with children which would be considered 'regulated activity' if frequent; and activities with adults at risk of harm that are not deemed as 'regulated activities'.

Enhanced check for regulated activity - checks undertaken include spent and unspent convictions / cautions held on the Police National Computer, plus information held locally by Police which is considered to be 'reasonably relevant'; to the post, plus a check against the Adult or Barred list of individuals who must not work with these groups. This type of check is suitable for unsupervised 'regulated activities' with children on a regular basis; working in a 'specified place' (children); specified activities with adults deemed as vulnerable when in receipt of those activities.

All individuals at Compass who work with children under the age of 18 and vulnerable adults whether online or classroom learning and clinical staff, will have an enhanced DBS check carried out at the start of their employment and every 2 years thereafter.

6.2 REGULATED ACTIVITIES

The full definition of regulated activity is set out in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, as amended by the Protection of Freedoms Act 2012.

6.2.1 Regulated activity relating to children

i. Unsupervised activities: teach, train, instruct, care for or supervise children, or provide advice/guidance on wellbeing, or drive a vehicle only for children;

- ii. Work for a limited range of establishments ('specified places') with opportunity for contact, for example; schools, children's home, etc;
- iii. Relevant personal care, e.g., washing, dressing, healthcare by or supervised by a professional;
- iv. Registered child-minders.

(Work under i) and ii) is a regulated activity only if done regularly.)

6.2.2 Regulated activity relating to adults

- i. Providing healthcare;
- ii. Providing personal care;
- iii. Providing social work;
- iv. Assisting with cash, bills and/or shopping;
- v. Assistance with the conduct of a person's own affairs;
- vi. Conveying.

Regulated activity excludes family arrangements, and personal arrangements.

Compass complies fully with the DBS Code of Practice which sets out obligation for everyone participating in the Disclosure process.

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6.2.1 Regulated activity relating to children

- Unsupervised activity: teach, train, instruct, care for or supervise children, or provide advice/guidance on wellbeing, or drive a vehicle only for children;

7.0 DEALING WITH SUSPICIONS OR ALLEGATIONS OF HARM, ABUSE OR EXPLOITATION

Compass employees and associates who have contact with children or adults at risk of harm have a responsibility to be alert to the possibility that an individual may have been harmed or exploited. Where indicators of harm, abuse or exploitation can be difficult to recognise, it is not our responsibility to decide whether harm has occurred, but only to raise concerns that an individual may be or may have been harmed or exploited. If staff, in the course of their work at Compass, become aware of a safeguarding issue, this must be treated as an absolute priority over other work considerations. Any suspicions or allegations will be investigated and reported immediately.

If any suspicions or allegations are made against a member of staff, this will be investigated as a matter of emergency with the board of DSOs. Any contact made with the staff member and learners will be postponed or chaperoned until the investigation is complete.

7.1 RECOGNISING EMERGENCY SITUATIONS

Deciding whether a situation is an emergency is a matter of personal judgment, but someone who is expressing a concern about the immediate safety of themselves or others, or a threat to life of any person, would warrant contacting the emergency services.

Action should be taken by contacting the Police on 999. A Designated Safeguarding Officer or the Designated Safeguarding Lead should also be notified immediately.

7.2 DEALING WITH DISCLOSURES

A disclosure need to be handled sensitively. The following suggestions may be helpful:

- Actively listen, without interruption, giving the person time to share their experience.
- Show that you believe what they are saying to you.
- Affirm that they have done the right thing in disclosing their experience.
- Avoid denial.
- Respect the person by listening to what they have to say and taking what they say seriously.
- Provide a safe environment.
- Make sure the setting is confidential and comfortable.
- Maintain a calm appearance.

8.0 REPORTING PROCEDURES

Safeguarding is everyone's responsibility, and a safeguarding concern must take absolute priority above all other workloads.

8.1 PROCEDURE

Where a member of staff has a safeguarding concern or has witnessed an incident which gives them a cause for concern, they should immediately contact a Designated Safeguarding Officer. The responsibility for handling remains with the staff member dealing with the disclosure.

8.2 MANAGING AN IMMEDIATE RISK OF HARM

Where there is an immediate risk of harm to an individual, the staff member concerned must try to mitigate this risk by calling the emergency services (999) immediately.

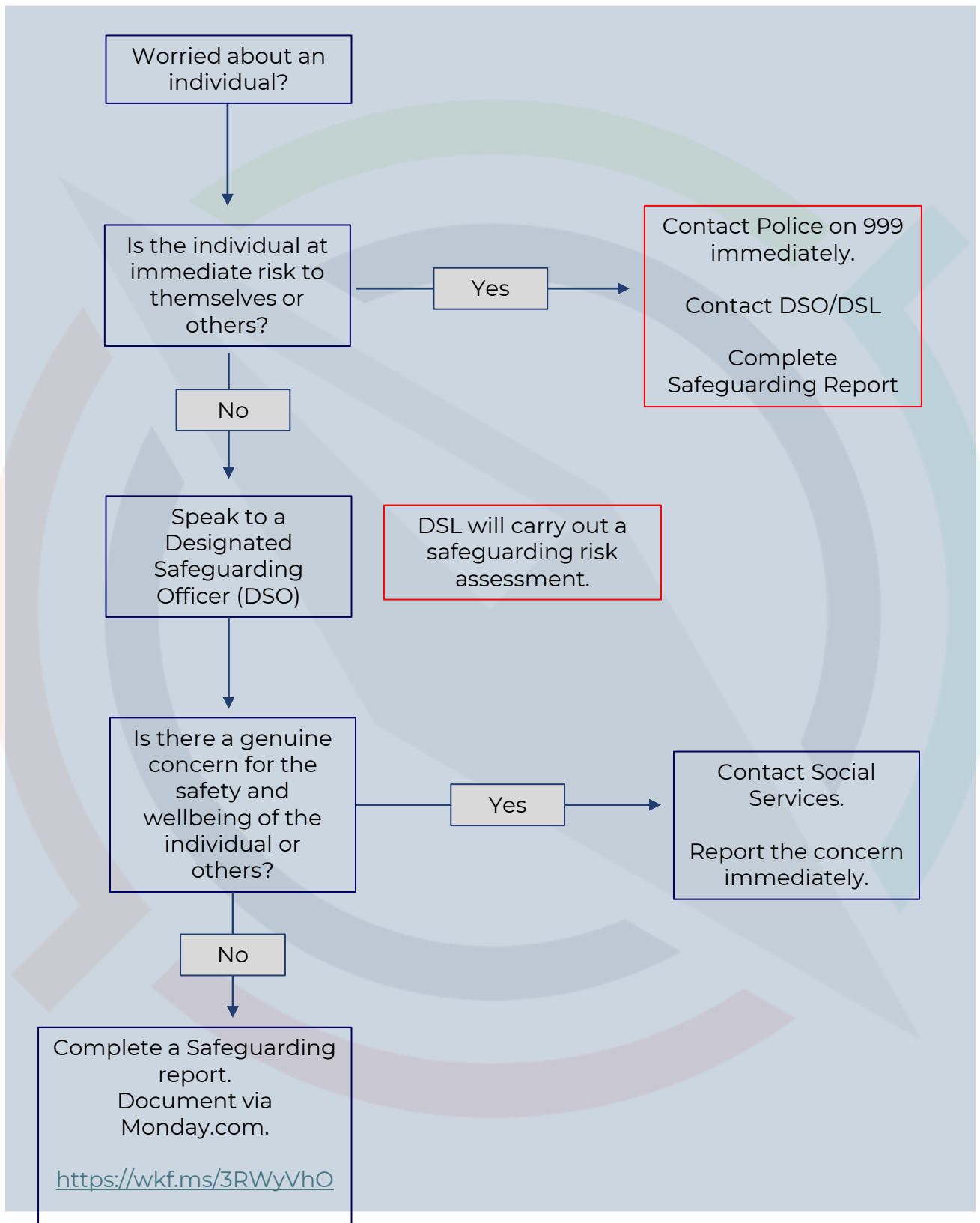
8.3 MANAGING DISCLOSURES TO A MEMBER OF STAFF

Where a staff member has received a disclosure or has witnessed an incident that doesn't require emergency de-escalation, they should contact a designated Safeguarding Officer (DSO) immediately. The DSO may advise the member of staff to make further contact with the individual concerned, to discuss context to the incident, and any other relevant details and to obtain the consent of the individual concerned. This responsibility lies with the member of staff.

The DSO and staff member should work together to report the incident and decide whether a referral to Social Services is necessary. Where the safeguarding concern related to possible radicalisation, the relevant DSO and staff member should discuss the matter further with the Prevent Lead.

Informed consent should be obtained from the individual concerned before making the referral wherever possible. It is therefore expected that staff discuss their intentions to refer a safeguarding concern to an external agency and gain consent to do so.

Where there is a significant risk of harm, an external referral must be made within 12 hours of first receiving the disclosure.



APPENDIX 2 – CODE OF CONDUCT

This advice relates to Compass' work with children: anyone under 18 years of age and may be a learner at Compass or adult at risk: anyone who is 18 years or over; who is or may be in need of community care services by reason of age, mental illness, other illness or disability; and who is or may be unable to take care of him or herself; or unable to protect him or herself against significant harm or exploitation and may be studying or working at Compass.

Your work may occasionally require you to carry out some of the 'Don'ts' such as physical contact or working in a 1 to 1 situation. Please do use common sense and continue your work, but also use your discretion to ensure your actions are necessary and appropriate in line with Compass policy and guidance. Where possible, arrange in advance for another staff member to be present, or inform them where you will be, how long and who you're with.

Staff should:

- Ensure welfare of the learners or clients (or subjects of the activity) always comes first regardless of aims of activity being carried out.
- Keep relationship on a professional footing, avoiding personal social contact.
- Try to separate personal and professional use of social media. Failure to do so may leave a staff member open to charges of bias (and could lead to disciplinary action).
- Ensure that any accidents involving individuals (whether children or adults) in their care are reported in accordance with Compass procedure.
- Treat all individuals equally and with dignity regardless of age, disability, gender reassignment, marriage and civil partnership; pregnancy and maternity, race, religion and belief, sex or sexual orientation.
- Be aware of and comply with the Safeguarding Policy and the Consensual Relationships Policy. In particular "Under the Sexual Offences Act 2003 it is an offence for anyone over the age of 18 working with young people (for example teachers, student mentors, academic staff etc.) to have a sexual relationship with a young person under the age of 18 who is in full time education."

Staff should avoid:

Working alone with a child / children or adult at risk. Always arrange for another adult to be present or be in an open or overlooked area or alternatively notify another member of staff and ensure he or she is nearby. This includes offering lifts to a child.

- Taking advantage of the position of trust that you are in as a staff member (in relation to any learners).
- Behaving in any manner that would leave any responsible person to question your suitability to work with children or adults at risk.
- Physical contact that could be open to misinterpretation by the child or a third party.
- Even when applying first aid staff should use discretion to ensure contact is necessary and appropriate.
- Conferring special attention and favour upon a particular individual or group of individuals or act in a manner that could be open to misinterpretation.
- Using or allowing others to use over familiar or sexually suggestive comments, inappropriate language or behaviour.



APPENDIX 3 – IDENTIFYING WARNING SIGNS

It is important to note that harm, abuse or exploitation is a violation of an individual's human and civil rights by any other person or persons. It can:

- Consist of a single act or repeated acts or multiples types of harm;
- Be intentional or unintentional or result from a lack of knowledge;
- Be an act of neglect, an omission or a failure to act;
- Cause harm temporarily or over a period of time;
- Involve taking advantage of existing vulnerabilities and needs that a person has: people in need of identity, friendship or care, who are frustrated, lost or feel they don't fit in;
- Involve manipulating or 'grooming' someone to get benefit or advantage or to make the person do something illegal or manipulating or dehumanising emotions to see others as outsiders and non-human – justifying actions – "they deserve it";
- Occur in any relationship; or be perpetrated by anyone, individually or as part of a group or organisation;
- Often constitute a crime, i.e. physical, sexual abuse, e.g. downloading or using pornographic images of children and/or storing them on computer equipment.

The following may indicate that harm is taking place (this list is not exhaustive):

- An accumulation of many changes in behaviour or appearance e.g. emotional, verbal and social behaviour as well as physical changes;
- Constantly being in receipt of new possessions which is out of character.
- Any allegation of mistreatment;
- Sudden, significant or unexplained change in behaviour;
- Inappropriate sexualised or risky behaviour;
- Concerns or injuries without an adequate explanation;
- Change in attitudes, defensive, quick to anger;
- Isolated and withdrawn or conversely forcing opinions on others;
- Non or poor attendance, change in standard of work;

- Physical and clothing changes;
- Being singled out and actively being discouraged from contact with friends and family.

Some of the above signs may just indicate that an individual needs some support. Please remember that a person can become vulnerable as a result of specific circumstances or situation which may increase the risk of exploitation.

