Safeguarding Children and Vulnerable Adults Policy

Reviewed and adopted by Board of Trustees: 1st October 2026

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Safeguarding Children, Young People, and Vulnerable Adults Policy

This policy applies to all employees, trustees, seconded staff, formal volunteers, freelancers, and Third-Party Providers working on behalf of Construction Youth Trust. For the purposes of this policy, the term 'staff' includes all those listed above, unless specifically differentiated.

This policy will be reviewed annually.

1. The Policy

1.1. Construction Youth Trust enables young people across London and North Kent to access career opportunities in the construction industry, with a priority focus on young people from disadvantaged backgrounds and underrepresented groups. Construction Youth Trust raises awareness of construction careers among young people, provides basic employability training, connects young people with employers, and offers one-to-one support to help them progress on the pathway into sustainable work or training, including apprenticeships.

1.2. Construction Youth Trust is committed to safeguarding and promoting the welfare of children, young people, and vulnerable adults and to ensuring appropriate action is taken to support them if they are at risk of harm. Construction Youth Trust requires all staff to share this commitment.

1.3. Construction Youth Trust believes all children, young people, and vulnerable adults should have the same protection regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation. We are committed to anti-discriminatory practices and recognise the additional needs of children, young people, and vulnerable adults from minority ethnic groups and disabled children and the barriers they may face, especially around communication.

1.4. This policy should be read in conjunction with other supporting procedures and policies, including Behaviour, Data Protection, Volunteering, Whistleblowing, Bullying and Harassment, Equalities, and Crisis Management.

2. Purpose

2.1. 2.1. The purpose of this policy is to:

- Provide a framework for the protection of children, young people, and vulnerable adults with whom, or on behalf of whom, Construction Youth Trust works.
- Provide all staff with guidance on how to respond to concerns they may have.
- Provide all staff with guidance on how to report concerns.
- Ensure compatibility with other Construction Youth Trust polices which contribute to the overall safety of children and vulnerable adults.
- Ensure Construction Youth Trust is operating in line with our values and within the law regarding our communication with young people, both in person and online.

2.2. All staff and trustees receive a copy of this policy.

2.3. Construction Youth Trust staff have no powers to investigate the external safeguarding issues of children, young people, or vulnerable adults. It is not the responsibility of Construction Youth Trust to decide whether there is an issue. It is, however, the responsibility of staff at Construction Youth Trust to act if there is cause for concern, in order that the appropriate agencies can investigate and take any action necessary to protect a child, young person, or vulnerable young adult.

3. Policy Application

3.1. Construction Youth Trust operates organisation-wide procedures including the Safeguarding Protocols included in Appendix 2. Specific responsibilities for safeguarding will be clearly defined in job/role descriptions and person specifications.

4. Values

4.1. Construction Youth Trust believes that:

- All children, young people, and vulnerable adults have the right to be protected, and should be listened to and have their views taken seriously.
- It has a duty of care to children, young people, and vulnerable adults that it comes into contact within the course of its business.
- It is always unacceptable for a child, young person, or vulnerable adult to experience abuse of any kind.
- Staff should act immediately if they believe a child, young person, or vulnerable adult is at risk of harm.
- Staff need to be aware of how issues of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation impact on their understanding of and response to keeping children, young people, and vulnerable adults safe.
- Joint working between agencies is essential for the protection of children, young people, and vulnerable adults.

4.2. Construction Youth Trust is committed to:

- Supporting young people to be confident and have good self-esteem.
- Ensuring that all young people in our care feel safe and supported.
- Listening and responding to young people and valuing all forms of communication.
- Operating effective systems to enable young people to communicate that they feel safe or unsafe.
- Ensuring its staff are aware of the possibility of a safeguarding issue and are supported to know how to address this.
- Having clear procedures for reporting and responding to allegations and concerns about a young person's safety.
- Working co-operatively with other agencies.
- Operating a Safeguarding Team to ensure decisions concerning complicated and sensitive issues are arrived at through informed discussion, whilst respecting confidentiality.
- Carrying out enhanced Disclosure and Barring Service (DBS) checks where appropriate for all employees, freelancer staff, and formal volunteers that are likely to encounter children, young people, and/or vulnerable adults, updating these checks regularly (at least every 3 years), and maintaining an internal DBS Single Central Record. An enhanced DBS check will only be required for session volunteers (as defined below) if they are taking part in a Construction Youth Trust programme that includes building an unsupervised one-to-one working relationship with young people, such as a mentoring programme.
- Ensuring any safeguarding information that comes to light regarding young people is incorporated into the young person's information on a reasonable need-to-know basis, whilst still ensuring confidentiality where applicable.

5. Definitions

The definitions of Construction Youth Trust are:

5.1. Children and Young People

The Children's Act, 1989 defines a child or young person as being up to the age of 18 years old. Extensions of this exist for children who have special needs and for those in local authority care settings. For the purposes of this policy, the term young person shall be used.

5.2. Vulnerable Adults

A vulnerable adult is a person who is 18 years of age or over, and who is, or may be, in need of community care services by reason of mental or physical disability, age or illness, including mental illness, and who is or may be unable to take care of themselves, or unable to protect themselves against significant harm or serious exploitation.

The Care Act 2014 provided a legal footing for adult safeguarding: it sets out a clear legal framework for how local authorities and other parts of the system should protect adults at risk of abuse or neglect. This is in addition to the Mental Capacity Act 2005 and Human Rights Act 1998.

5.3. Freelancer

Construction Youth Trust may at times employ an individual (whether as a sole trader or through their own company) to deliver Construction Youth Trust designed sessions or programmes. These individuals are defined as freelancers.

5.4. Session Volunteers

Construction Youth Trust receives the support of many organisations and companies who donate the time of their employees to help CYT staff introduce young people to the real world of work and support them in their development. Session Volunteers are industry employees who accompany CYT staff to sessions and/or other delivery, usually on a one-off ad-hoc basis. They are supervised at all times by the CYT staff team and are never left alone with young people.

Third-Party Providers

Construction Youth Trust may at times utilise the services of a third-party business to use their employees to undertake sessions or programmes on behalf of Construction Youth Trust. There is no direct employment between Construction Youth Trust and the person who undertakes the delivery. Activities undertaken may have been designed by Construction Youth Trust or by the provider.

5.5. Trustees

A member of Construction Youth Trust's Board of Trustees.

5.6. Formal Volunteers

When an individual, other than a trustee, is providing regular time and expertise to Construction Youth Trust in a professional context which is over and above that of a Session Volunteer, they are a Formal Volunteer.

5.7. Signposted Opportunities

CYT's aim is to support young people to make positive progress on their individual journey to a rewarding career. From time to time, we may signpost young people to

opportunities with external organisations. This may include employer job fairs, local council opportunities and other youth organisation events. CYT are not involved in the preparation or delivery of these opportunities and do not take any responsibility for them.

CYT-Facilitated Opportunities5.9 CYT-Facilitated Opportunities
CYT's aim is to support young people to make positive progress on their individual journey to a rewarding career. From time to time, we may connect young people to opportunities with employers and other organisations to support them on their career journey. This may include Live Vacancy Days and other CYT-delivered events. It may also include job opportunities, work experience and work trials provided by a partnered employer to support a young person to secure their next step. It is the responsibility of the young person and their parent/guardian to do their own due diligence before attending any opportunity.

6. Legislation and Guidance

6.1. Over the last 10 years there has been a wealth of legislation and guidance relating to the protection of children, young people, and vulnerable adults. Construction Youth Trust's safeguarding policy is informed by the following published guidance documents:

- The Children's Act 2004 places a duty on a range of organisations and individuals to have in place arrangements that safeguard and promote the Welfare of children.
- 'Working Together to Safeguard Children – a guide to inter-agency working to safeguard and promote the welfare of children (2018)' sets out the arrangements that organisations should have in place to safeguard children.
- Charities who operate within certain regulated sectors are subject to guidance specific to them, such as Keeping Children Safe in Education. While Construction Youth Trust is not regulated like a college or school, the Trust's Safeguarding Policy is informed by this guidance.
- The Care Act 2014 sets out a legal framework for how local authorities and other parts of the system (includes voluntary sector) should protect adults at risk of abuse or neglect.
- The Charity Commission has a regulatory role focused on the conduct of trustees. The Charity Commission has published its own guidance, which fall into two parts. First, a policy paper titled 'Safeguarding Children and Young People (2014)'; and secondly a strategy document called 'Strategy for Dealing with Safeguarding Vulnerable Groups including Children issues in Charities' (2013).

7. Types of Abuse and Recognition

7.1. Abuse can take a number of forms including:

7.1.1. **Physical**: causing physical harm to a child by hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating or some other method. Physical harm can also be caused when a parent or carer fabricates the symptoms of or deliberately induces illness in a child.

7.1.2. **Sexual**: forcing or enticing a child to take part in sexual activities, whether the child is aware of what is happening. Sexual abuse includes both physical contact and non-contact, online/offline, group or peer influenced activities. Sexual

behaviour displayed by young people themselves is deemed harmful when it is coercive, non-consensual, or not developmentally typical.

7.1.3. **Emotional**: the persistent emotional maltreatment of a child in a way likely to cause severe and persistent negative effects on the child's emotional development.

7.1.4. **Neglect**: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health and/or development.

7.1.5. **Discriminatory**: Acts or comments, including incitement of others to commit abuse. Includes racist, sexist, or homophobic abuse, as well as abuse relating to age, illness, or disability.

7.2. More information on different types of abuse can be found in Appendix 1.

7.3. Staff may become aware of abuse in a number of ways:

- Disclosure by a child or vulnerable adult
- Disclosure or remarks made by another party (e.g., carer, other professional or member of the public)
- Discovery of bruising or marks on an individual's body
- Unexplained changes in behaviour or personality
- Evidence of disturbance or explicit detail in drawing, writing, or play
- Evidence of neglect in terms of cleanliness, personal hygiene, failure to thrive or apparent exposure to unnecessary risks
- Persistent lateness, poor or irregular attendance or persistent absence from their training venue

8. Prevent Duty

8.1. The Trust recognises its public duty, as an organisation that works with young people, to have due regard for the need to prevent young people from being drawn into terrorism. This includes violent terrorism, as well as non-violent extremism which can create environments conducive to terrorism. Extremism is defined in the Prevent Strategy as 'vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

8.2. Staff are made aware what radicalisation means and why people may be vulnerable to being drawn into terrorism as a consequence of it. They understand the risk and signs of radicalisation. Any concern that a young person may be at-risk of radicalisation or being drawn into terrorism will be dealt under our safeguarding reporting procedure.

8.3. The DSL and Deputy DSL will be responsible for ensuring that staff members are aware of their Prevent duty and the steps to take if there is any concern for a young person. All staff are made aware of their Prevent duty through an external training course from Gov.uk. Construction Youth Trust requires all staff and trustees to refresh this training every 3 years.

9. Roles and Responsibilities for Safeguarding Children, Young People, and Vulnerable Adults

Construction Youth Trust believes that safeguarding is everyone's responsibility. The Trust has designated roles with additional safeguarding responsibilities. These are outlined below.

9.1. The Board of Trustees

The Board ensures that Construction Youth Trust:

- Has a Safeguarding policy and procedures in place that are consistent with any statutory requirements and guidance, reviewed and updated annually.
- Appoints the Designated Safeguarding Lead (DSL), Deputy Designated Safeguarding Lead (Deputy DSL(s)), and Trustee Safeguarding Lead(s).
- Ensures all staff, trustees, and formal volunteers receive appropriate safeguarding training when they are recruited, refresher training at appropriate intervals, and information on Construction Youth Trust's safeguarding arrangements during their induction to the organisation.
- Has procedures in place for dealing with allegations of abuse against children, young people, or vulnerable adults whilst in the care of Construction Youth Trust.
- Follows Safer Recruitment protocols that include checks on staff, trustees, and volunteers' suitability to work with children, young people, and vulnerable adults (see Appendix 4 for more information).
- Includes Safeguarding as an essential item on the organisation's risk register
- Trustees receive quarterly safeguarding monitoring reports from the Safeguarding Team, acting where appropriate.

9.2. The Safeguarding Team

The Safeguarding Team is responsible for:

- Undertaking a regular meeting to discuss safeguarding, at least twice yearly or convened at any time when a potential risk has been identified or a significant incident reported.
- Completing an annual review of the safeguarding policy and supporting procedures.
- Preparing an Action Plan and monitoring and reporting progress against the implementation of actions.
- Providing advice and making recommendations to the Chief Executive and trustees on the safeguarding of young people across the organisation.
- Coordinating safeguarding arrangements and providing support to staff on all matters to do with the application of the policy.

The Safeguarding Team is made up of the following members:

- Russell Taylor, Trustee
- Carol Lynch, Chief Executive
- Pearl O'Keeffe, Head of Programmes
- Naomi Ryan, Senior Programmes Manager
- Esmee White, Programmes Hub Manager

9.2.1.1. **Designated Safeguarding Lead**

The Designated Safeguarding Lead is responsible for:

- Ensuring all staff are aware of this policy and related documentation.
- Supporting staff involved in reporting incidents.
- Ensuring the Safeguarding Team are appropriately involved and supported in any safeguarding decisions made.
- Ensuring all staff receive regular updates and information on all relevant safeguarding matters.
- Preparing timely safeguarding reports for the CEO and trustees, as and when required.
- Discussing safeguarding concerns and supporting colleagues to arrive at effective responses within the confidentiality of the Safeguarding Team.
- Liaising with the local authorities, local social services, police authorities, and other agencies on individual cases of suspected or identified child abuse.
- Acting as the contact person(s) within the organisation (this may be delegated to other members of the Safeguarding Team with the approval and supervision of the DSL).
- Liaising with staff on a 'need to know' basis so that children, young people, and vulnerable adults' rights to confidentiality are ensured.
- Supporting the planning of any curricular or other learner provision.
- Representing the Trust at child protection meetings, if required.
- Ensuring that the Deputy DSL is fully briefed and equipped to carry out the role of DSL during any planned or unplanned absences.

Designated Safeguarding Lead: Pearl O'Keeffe, Head of Programmes
Address: London Scottish House, 95 Horseferry Road, London SW1P 2DX
Telephone: 020 7467 9540
Mobile: 07943 068555

9.2.2. **Deputy Designated Safeguarding Lead**

The Deputy Designated Safeguarding Lead is trained to the same level of the DSL and, in the absence of the DSL, carries out those responsibilities necessary to ensure the safety and protection of all young people.

Joint-Deputy Designated Safeguarding Lead: Esmee White, Programmes Hub Manager
Address: London Scottish House, 95 Horseferry Road, London SW1P 2DX
Telephone: 020 7467 9540
Mobile: 07960078872

Joint-Deputy Designated Safeguarding Lead: Naomi Ryan, Senior Programmes Manager
Address: London Scottish House, 95 Horseferry Road, London SW1P 2DX
Telephone: 020 7467 9540
Mobile: 07508738689

9.3. Staff

The responsibilities of staff are to:

- Ensure the general safety and wellbeing of young people and all those who

come in to contact with them.

- Ensure they are familiar with and adhere to all relevant safeguarding policies and procedures including those involved in recognising and reporting safeguarding incidents and the staff safeguarding code of conduct (see Appendix 4).
- Ensure young people on our programmes are aware of how to raise any safeguarding concerns and how the concern will be dealt with.
- Report all concerns, without judgement about their significance, to the DSL or DDSL.
- Ensure appropriate risk assessments are in place before undertaking any activity involving young people and that preventive and protective measures identified in risk assessment are followed for all activities.
- Ensure that volunteers, freelancers, and third-party providers are aware of Construction Youth Trust's safeguarding policy and know how to recognise and report any concerns.
- Adhere to appropriate confidentiality.
- Undertake appropriate training and refresher training annually or as directed.
- Ensure that session volunteers are never left alone with a young person or groups of young people.
- Ensure the Trust has access to an up-to-date and appropriate DBS/criminal record check for them as individuals, updated at least every three years.
- Inform the Trust immediately of any criminal convictions, warnings, reprimands, etc. including motoring offences and suspensions that may alter the status of their DBS check. This obligation extends to and includes any allegations made by previous employers even though the staff member may consider them to be untrue. The Trust encourages the openness of colleagues in making the Trust aware at an early stage of any circumstances where they become involved with the police or are being investigated for a potential offence.

Breaches of the Trust's safeguarding policy, protocols, and/or Code of Conduct will be reported to the DSL, Deputy DSL, and the CEO. Serious and persistent breaches will be dealt with via Trust's disciplinary and HR processes.

10. Requirements for Working with the Trust

10.1. Staff (employees, formal volunteers and freelancers)

To successfully secure a position with Construction Youth Trust, prospective staff will be required to:

- Complete a standard application form.
- Complete a declaration form to disclose previous spent/unspent convictions.
- Declare that they are not aware of anything that would make them unsuitable to work in a charity supporting young people and vulnerable adults.
- Provide identity documents including photographic identity.
- Provide proof of right to work in the UK.
- Provide at least two satisfactory referees, who are able/willing to confirm that to their knowledge there is no reason the individual should not be allowed to work with children, young people, and vulnerable adults.
- Provide qualification certificates if required for the role.
- Complete an enhanced Disclosure and Barring Service (DBS) check where appropriate and make the DBS certificate available for the Trust to check, if the

role/place of work requires it i.e., if they are likely to encounter children, young people, and/or vulnerable adults. Applicants will be made aware in advance if they are applying for a post that requires a DBS check. In certain circumstances, the Trust may accept a certificate requested for another role.

All role descriptions contain information about Safeguarding responsibilities. The Safer Recruitment procedures set out in Appendix 4 will be followed for all employed positions that may involve direct contact with young people.

10.2. Trustees

Construction Youth Trust checks the identity and suitability of all Trustees and requires an Enhanced DBS check to be undertaken. The Trust may accept a DBS check requested for another role. An induction pack is provided and where possible an induction day arranged for new Trustees which includes a session on safeguarding. All Trustees complete an annual Trustee Declaration as required by the Charity Commission.

10.3. Third Party Providers

Third Party Providers will be asked to confirm the following for their employees and/or associates who are working on behalf of Construction Youth Trust:

- That the individuals have been identity-checked and have permission to work in the UK as part of their recruitment process in writing.
- That a suitable and clear DBS check has been received within the last 3 years for the role their employee/associate is to undertake and a copy to be provided to Construction Youth Trust.
- That appropriate safeguarding training and refresher training is undertaken.
- That there is a safeguarding policy in place.
- That the provider has adequate insurance, including Employer's Liability Insurance and Public Liability Insurance of at least £10,000,000 and that cover extends to young people.
- Third party providers will be required to adhere to any risk assessment provided by Construction Youth Trust where the provider is undertaking activities that have been designed by Construction Youth Trust. Where the provider is undertaking an activity they have designed, the provider will be asked to provide a risk assessment to Construction Youth Trust. For activities with schools, the risk assessment will be provided to the school for their consideration. No activity can commence without Construction Youth Trust, and the school where relevant, confirming that the risk assessment meets their requirements.

10.4 External/Signposted Opportunities

Construction Youth Trust's aim is to support young people to make positive progress on their individual journey to a rewarding career. From time to time, the Trust may signpost young people to opportunities with employers and external organisations such as apprenticeships, jobs, careers fairs, and/or work experience placements. However, Construction Youth Trust is not responsible for external opportunities and does advise or recommend any particular opportunity. It is the responsibility of young people themselves, along with their parents/guardians, and referral partners, to do the appropriate due diligence and make sure they are satisfied with the suitability of any potential external opportunities

While work experience placements may be organised with the support of Construction Youth Trust, the placement is entirely under the care of the host employer who will be responsible for the young person on site/office during the placement. Work Experience providers as required to complete a Due Diligence Checklist before undertaking any work experience placements to confirm they have a number of measures in place including insurance, risk assessments, health and safety policies and first aiders on site..

No specific requirements for sign-posted only activities.

10.5 Session Volunteers

Session Volunteers will be required to read and sign Construction Youth Trust's Child Protection Briefing document before each session and will always be supervised by Trust staff. Trust staff must add the date that the document was signed to Salesforce immediately. If the volunteer provided photo consent, Trust staff must also add a copy of the document to Salesforce.

Safeguarding Training

10.4. It is important that all staff have training to enable them to recognise the possible signs of abuse and neglect and to know what to do if they have a concern.

10.5. All staff are expected to undertake online safeguarding awareness training as part of their induction to the organisation. Refresher training takes place annually for employees and formal volunteers, and every three years for trustees. Freelancers are also expected to undertake appropriate safeguarding training before commencing work with the Trust or provide documentation that equivalent training has been undertaken in the previous 12 months.

10.6. Prior to starting and again in their first week of employment, new staff, formal volunteers and freelancers are given a copy of the Construction Youth Trust Safeguarding Policy, together with other related policies.

10.7. All those leading on Construction Youth Trust's recruitment for employees carry out Safer Recruitment training. There will always be at least one trained person involved in any recruitment and selection process. Safer Recruitment training must have been completed/refreshed within two years prior to the recruitment process.

10.8. The DSL and Deputy DSL undergo CPD accredited Advanced (DSL) Child Protection Training which is refreshed every two years.

10.9. All staff undergo additional PREVENT training which is refreshed every three years.

11. Recording and Reporting

11.1. <u>Reporting Procedure</u>

If a Construction Youth Trust staff member becomes aware of any safeguarding concerns relating to a young person, they must follow the standard reporting procedure set out below.

- The staff member must record the details of the incident/concern as soon as reasonably possible using the Safeguarding Incidents reporting form on Salesforce to automatically alert the DSL, Deputy DSL, and CEO, even if it has been resolved. The staff member must include as much information as possible including dates, times, venues, names of all those involved, and wherever possible, the exact language used by the young person involved.
- If the incident/concern is reported to Construction Youth Trust staff by a session volunteer or other third-party individual, Trust staff must ask them to record their concern in writing as above and report the incident/concern on their behalf.
- If the young person(s) involved is under the care of a school, college, or other agency, Trust staff must share their concern with the lead contact that is present. Even if the incident/concern is resolved, or the lead contact agrees to report the incident to their organisation's processes, Trust staff must still report the incident internally as outlined above.
- If Trust staff believe the incident/concern requires the immediate attention of the Safeguarding Team, they must make direct contact with the DSL (or Deputy DSL/CEO if DSL is not available) to ensure they are aware of the incident/concern. The incident/concern must still be recorded Salesforce as soon as reasonably possible, even if it has been resolved.
- Following an incident report, the DSL and/or Deputy DSL will decide on what action to take within 24 hours, including consulting with the school, college, or other partner agency. The DSL and/or Deputy DSL will inform the staff member that reported the incident if any further information or action is required from them.
- The Chief Executive will be informed of serious incidents at the earliest opportunity by the DSL or Deputy DSL. See the Trust's Crisis Management Policy.
- The DSL and/or Deputy DSL will prepare a quarterly report detailing patterns observed from reported safeguarding incidents/concerns to present and discuss at Safeguarding Team meeting.
- Any highly confidential safeguarding records relating to child and vulnerable adult welfare concerns will only be kept electronically, with access limited to the DSL, Deputy DSL, and Chief Executive. A record will be kept and the young person's contact page on Salesforce will be marked that there is confidential information available to staff who are to engage with the student with access to it sought via the Safeguarding Lead, Deputy, or Chief Executive.

11.2. Where a Criminal Offence is Suspected

Wherever a criminal offence is alleged, or is suspected to have taken place, the police must be contacted for further advice. The DSL will consult with the school, college, partner agency, Local Authority Designated Officer, or Team of Designated Officers as appropriate to clarify who will contact the police. If it is agreed that a third party should contact the police, then the DSL will follow this up to ensure it has happened.

11.3. Immediate Risk or Danger

If a young person is at immediate risk of harm or in a situation where forensic evidence could be required, Trust staff must contact the emergency services immediately before reporting the incident on Salesforce or contacting a member of the Safeguarding Team.

11.4. Concerns about a Construction Youth Trust Colleague

Construction Youth Trust's Whistleblowing Policy enables staff to raise concerns and/or allegations in confidence and for a sensitive investigation to take place.

If a member of staff has concerns about a colleague relating to safeguarding, they should contact the DSL or Deputy DSL. They will decide whether the Local Authority Designated Officer or Team of Designated Officers need to be contacted. Any concerns about the behaviour of the Chief Executive will be reported immediately to the Chair of the Board of Trustees by the DSL. Any concerns about the DSL or Deputy DSL should be reported to the Chief Executive.

The Chief Executive will inform the Disclosure and Barring Service if a member of staff, formal volunteer, or trustee is removed or resigns from post due to safeguarding issues.

The Chief Executive, in liaison with trustees, will decide whether to refer a safeguarding issue to the Charity Commission. See the Trust's Crisis Management Policy.

Reference should also be made to Construction Youth Trust's Whistleblowing Policy if appropriate.

11.5.

11.6. Ensuring Young People and Others are Aware of How to Raise Concerns

Construction Youth Trust takes proactive measures to ensure young people, parents, session volunteers, schools, and other partners know how to raise safeguarding concerns.

Young people, parents, session volunteers, schools, and other partners are made aware of the email address(safeguarding@constructionyouth.org.uk) which can be used to raise safeguarding concerns (with regards to CYT staff or otherwise) confidentially. Emails to this address are automatically forwarded to the DSL, Deputy DSL, and CEO.

Any concerns received through the confidential email should be addressed immediately by the DSL, or the Deputy DSL if the DSL is not available.

If the complaint involves the DSL, then they are dealt with by the CEO.

11.7. Young People Subject to a Child Protection Plan

Construction Youth Trust staff will ask the relevant agency, school, or local authority, when a young person in our care is subject to a Child Protection Plan, for any issues that it should be aware of and how they should be addressed. Trust staff will take forward an appropriate risk assessment for the individual, dependent upon issues that are divulged.

The name of the relevant contact, such as social worker and/or care manager, must be clearly recorded on the young person's contact page.

When a child is on a Child Protection Plan, Construction Youth Trust staff will discuss with the relevant contact what information they want us to share.

11.8. How to Respond if a Child Confides Abuse to You

Construction Youth Trust understands the importance of responding appropriately to Safeguarding disclosures from young people and requires all staff to follow the below universal guidance, regardless of the age of the young person involved.

It is important to:

- Stay calm and be patient.
- Try to find a quiet place where your conversation will not be interrupted but still follow Trust protocols about remaining within eyeshot or earshot of another responsible adult.
- Be welcoming, even if the time isn't convenient for you. It may have taken a great deal of courage for them to approach you, and they may not do so again.
- Try to make the young person feel safe and secure. Reassure them that they have done nothing wrong in telling you.
- Listen carefully and take it seriously.
- Ask questions for clarification only.
- Explain what you will do with the information and what will happen next.
- Write down what you have been told as soon as possible and follow the Trust's reporting procedures.
- Inform the lead contact present if the young person is under care of a school, college, or other agency before reporting the incident.

It is important to not:

- Promise confidentiality.
- Ask leading questions.
- Look panicked, shocked, or angry.
- Make the young person repeat their story.
- Interrupt.
- Give an opinion.
- Inform parents until you have discussed the disclosure with the DSL/Deputy DSL.

If a young person is at immediate risk of harm or in a situation where forensic evidence could be required, Trust staff must contact the emergency services immediately before reporting the incident on Salesforce or contacting a member of the Safeguarding Team.

If a child asks for confidentiality and refuses to say anything further when they are told this cannot be guaranteed, Trust staff must inform the lead contact that is present, if applicable, and report the incident as soon as possible.

12. Confidentiality and Sharing Information

12.1. All staff will understand that safeguarding issues warrant a high level of confidentiality to ensure that confidential information is not released into the public domain.

12.2. Staff should only discuss concerns with the DSL, Deputy DSL, or CEO. The Safeguarding Team will then decide who else needs to have the information and will disseminate it on a need-to-know basis.

12.3. All safeguarding information relating to concerns about a young person will be stored electronically and in line with the principles of the Data Protection Act 1998. There will be a flag on the young person's record that a safeguarding issue exists, but access will be restricted to the DSL, Deputy DSL, and Chief Executive. If necessary, confidential information will be made available to staff who engage with the young person on a need-to-know basis.

12.4. If any member of staff receives a request from an agency or individual to see a young person's safeguarding protection record or information relating to a safeguarding incident, they must refer the request to the DSL. The DSL will ensure they can identify who is requesting the information before sharing it and then record what has been shared, when, why, and with whom.

13. E-Safety

Construction Youth Trusts believes that young people should never experience abuse of any kind, including online abuse. Young people on Construction Youth Trust programmes should be able to use the internet for education and personal development, but safeguards need to be in place to ensure they are kept safe. Construction Youth Trust recognises that we have a duty to ensure all young people and staff involved in our organisation are protected from potential harm online. We will seek to keep young people and staff safe by:

- Providing clear and specific directions to staff on how to behave when interacting with young people online.
- Responding appropriately to any incidents of inappropriate online behaviour, whether by a staff member or young person, during CYT programmes/activities, in line with our standard reporting procedures.
- Examining and risk assessing any social media platforms and new technologies before they are used within the organisation.

Young people on Construction Youth Trust programmes may be given access to the Trust's internet network as part of a programme. Young people will access a separate segregated network that blocks access to inappropriate websites and content. Information on how to join the young person's network is posted around Trust offices and available to all staff.

Young people may request and be given a Trust-owned device to complete the programme. These devices can be remotely managed and disabled by Construction Youth Trust staff. They also contain web filtering to block access to inappropriate websites and content. Young people and their parent/guardian will sign an Equipment Code of Conduct form before receiving the device.

14. Risk Assessments

15. 1 Construction Youth Trust has developed risk assessment templates designed to safeguard the young people that we engage with, our staff, and volunteers. The areas covered by these risk assessment templates are:

- 121 Support (including working online)

- Group Online Sessions
- Visit to Third-Party Site
- Travel in CYT Care
- School Sessions
- Practical Activities
- Individual Young Person

15. Reviewing and Monitoring the Safeguarding Policy

16.1 It is the responsibility of the Safeguarding Team to review and monitor Construction Youth Trust's Safeguarding Policy and procedures.

16.2 The Board of Trustees are responsible for considering and agreeing changes to the policy and procedures as recommended by the Safeguarding Team.

16.3 All Senior Leaders, Senior Managers, and Managers, supported by the DSL and Deputy DSL, are responsible for ensuring the policy and procedures are implemented consistently across the organisation.

16. Useful Safeguarding Contacts

The table below contains useful contacts which can be used when seeking guidance on safeguarding issues. This list is not exhaustive and as Construction Youth Trust operates across a few boroughs it is necessary to know where to locate the contact details of the appropriate Local Authority Designated Officer (usually by searching on the internet under the county or borough name then LADO).

NSPCC Child Protection Helpline	www.nspcc.org.uk help@nspcc.org.uk 0808 800 5000
Safe CIC	https://www.safecic.co.uk/
Get Safe Online	https://www.getsafeonline.org/personal/article- category/safeguarding-children/

17. Appendices

Appendix 1: Definitions & Signs of Child Abuse
Appendix 2: Safeguarding Protocols
Appendix 3: Safeguarding Code of Conduct
Appendix 4: Safer Recruitment Procedures
Appendix 5: Adverse Risk Assessment Template
Appendix 6: Safeguarding Disclosure Form

Appendix 1: Definitions & Signs of Child Abuse

Construction Youth Trust defers to the NSPCC's guidance on the definitions and signs of child abuse, as detailed below. For further information, please refer to the NSPCC's guidance.

1. What is child abuse?

What is child abuse? Child abuse happens when a person harms a child. It can be physical, sexual or emotional, but can also involve neglect. Children may be abused by:

- Family members
- Friends

- People working or volunteering in organisational or community settings
- People they know
- Strangers

2. What is neglect?

Neglect is not meeting a child's basic physical and/or psychological needs. This can result in serious damage to their health and development. Neglect may involve a parent or carer not:

- Providing adequate food, clothing or shelter
- Supervising a child or keeping them safe from harm or danger (including leaving them with unsuitable carers)
- Making sure the child receives appropriate health and/or dental care
- Making sure the child receives a suitable education
- Meeting the child's basic emotional needs – this is known as emotional neglect.

Neglect is the most common type of child abuse. It often happens at the same time as other types of abuse.

3. General signs of abuse

Children experiencing abuse often experience more than one type of abuse over a period of time. Children who experience abuse may be afraid to tell anybody about the abuse. They may struggle with feelings of guilt, shame or confusion – particularly if the abuser is a parent, caregiver or other close family member or friend.

Many of the signs that a child is being abused are the same regardless of the type of abuse. Anyone working with children or young people needs to be able to recognise the signs. These include a child:

- Being afraid of particular places or making excuses to avoid particular people
- Knowing about or being involved in 'adult issues' which are inappropriate for their age or stage of development, for example alcohol, drugs and/or sexual behaviour
- Having angry outbursts or behaving aggressively towards others
- Becoming withdrawn or appearing anxious, clingy or depressed
- Self-harming or having thoughts about suicide
- Showing changes in eating habits or developing eating disorders
- Regularly experiencing nightmares or sleep problems
- Regularly wetting the bed or soiling their clothes
- Running away or regularly going missing from home or care
- Not receiving adequate medical attention after injuries.

These signs do not necessarily mean that a child is being abused. There may well be other reasons for changes in a child's behaviour such as a bereavement or relationship problems between parents or carers. If you have any concerns about a child's wellbeing, you should report them immediately following the reporting procedures outlined in this policy.

Appendix 2: Safeguarding Protocols

1. Supervision Protocols

1.1. Group Sessions

The Trust's default adult to young person ratio is 1:10 for young people 13 years and above; 1:8 for young people 12 years and below, as per NSPCC guidelines. Exceptions are:

- Groups evaluated as low risk (e.g., sixth formers with no particular risks identified by school), then ratio can be increased to 1: 15 or higher if appropriate
- Ratio may be decreased if there are higher risk young people participating in the activities (e.g., young people with special educational needs; young people affected by violent crime)

Every group of young people must be supervised by at least one DBS verified member of the Construction Youth Trust team or trusted partner organisation (e.g., YJS, school, third party provider).

Young people must not be left alone with a single adult, including Construction Youth Trust staff, at any time. Trust staff must always be within eyeshot or earshot of another responsible adult when working with young people e.g., a trainer could work with a young person or a small group of young people in a separate area if there is an open door/window to other staff members.

1.2. One-to-One Sessions

One-to-one session must only be held in Construction Youth Trust offices or on the premises of trusted partner organisation whose staff are aware of the session(s) in advance. One-to-one sessions must not be carried out in public places such as cafes or restaurants. If held in a trusted partner organisation's premises, these arrangements must be confirmed in writing in advance of each meeting including partner staff being aware that one-to-ones must always be in eyeshot or earshot of another responsible adult. Trust staff must indicate the location of all meetings, including one-to-one sessions, in their Outlook diary and record the identity of the young person on CRM.

Construction Youth Trust staff must only conduct home visits under exceptional circumstances provided that the following conditions are met:

- The staff member has received written consent from their line manager at least 2 days prior to the home visit
- The staff member will always be accompanied by a referral partner
- The staff member has obtained a risk assessment from the referral partner prior to cover the visit and has uploaded it to the young person's contact page

1.3. Unsupervised Times

Young people under the age of 18 must be supervised at all times while in the care of Construction Youth Trust, unless the Trust has received parental consent stating otherwise from the programme registration form. It is the responsibility of Trust staff to clarify on the programme registration form if young people will be left unsupervised at any time, for example to leave the premise during lunch breaks, and to obtain parental consent for this.

Young people over the age of 18 can be left unsupervised unless it is unsafe to do so. If a group or individual young person is deemed medium or high risk, Trust staff must discuss extra precautions with the school or referral partner contact to protect the safety of all young people involved on the programme. These will be detailed in an Individual Risk Assessment created for the young person.

2. Communication With Young People

Details relating to how and when Construction Youth Trust staff will communicate with young people will be clearly outlined to young people, parents, schools, and referral partners on programme registration documentation.

2.1. Means of Communication

Construction Youth Trust requires staff to log all communications with young people, including face-to-face and online sessions, emails, calls, and text/WhatsApp messages on Salesforce. All communication with young people must take place via professional laptops and mobile devices.

Construction Youth Trust can communicate with young people using WhatsApp under the following conditions:

- Staff use their work mobile phone and number
- Staff use a professional display picture (e.g. CYT logo or professional photo)
- Staff disable the “last active” feature so that young people cannot see when they were last active online
- The young person they are communicating with has completed a programmes registration form
- If the young person is under 18, the Trust has received parental consent to communicate with the young person from the registration form
- Staff follow the current protocols of logging all calls and messages on Salesforce
- Staff do not delete message, send voice notes, broadcast messages, or view or post statuses under any circumstances
- Staff do not communicate with young people in group chats
- Staff to ensure young people do not use disappearing messages for any communication with CYT.

If staff receive inappropriate messages, images, or voice notes of any kind from a young person, they must report it as soon as reasonably possible following standard reporting procedures

2.2. Hours of Communication

Staff should avoid communicating with young people outside of normal office hours, including on the weekend. Young people will be made aware that Construction Youth Trust mobile phones are normally switched off outside of working hours. If staff plan to communicate with a young person outside of these hours (e.g. a young person is starting work at 9am on a Monday and their coach needs to check in with them before their day starts), they must get permission from the DSL or Deputy DSL in advance, except in the following exceptional unplanned circumstances:

- Communicating any immediate issues relating to the location of an activity e.g. the location of a 9 am session at a third-party venue changes last minute or a young person is unable to find the venue.

- Cancellation of planned activities need to be communicated urgently e.g. notification is received out of hours that a work experience placement starting on the Monday morning has been cancelled.
- A young person contacts a staff member out-of-hours e.g. a young person calls staff in distress at 7.30 am because they are anxious about a CSCS test or work experience placement starting at 10 am. If this situation arises, every attempt will be made initially to deal with the issue within working hours and/or via text e.g. staff might text that they are available to talk to the young person at 9 am. If this is not possible, and the situation requires immediate attention, staff should then contact the young person via their emergency contact in the first instance if they are available and it is deemed safe to do so. Staff should also attempt to contact our own DSL or Deputy DSL and/or their own manager if possible. As a last resort, if all other avenues have been exhausted and the staff believe the issue needs immediate attention, staff can communicate directly with the young person and, if necessary, call emergency services. Any unplanned communication out of hours should be logged on the CRM with any safeguarding concerns reported in the usual way.

Staff should avoid communicating with young people on school programmes outside of term-time except in the following instances:

- Young people are transitioning on to their next step e.g., Year 11s in the summer holiday after their GCSE exams or Year 13s after their A-levels.
- For evaluation purposes.
- Young people are completing a work experience placement outside of term-time.
- It has been pre-agreed with the school, and they have provided the contact details of their safeguarding lead.
- If a young person is progressing onto a different CYT programme.
- To provide post-transition supporting leading up to, and at the beginning of, a young person commencing an employment/education/training opportunity.

2.3. <u>Social Media</u>

Construction Youth Trust acknowledges that potential risks may arise from young people attempting to contact Trust staff through social media. Staff should seek the advice of the DSL or Deputy DSL if they have any concerns about the internet, social media, and/or digital/online learning platforms and follow the below protocols.

- Staff must not 'friend', 'follow', or 'connect' with young people who are on Construction Youth Trust programmes/activities on any social media accounts.
- Staff must remove/unfriend/block any young people who do attempt to follow/friend them on social media and must inform the DSL/Deputy DSL as soon as possible, following standard reporting procedures.
- Staff must not communicate with young people on any social media account or via private messages. Staff must not make any direct contact with young people using Construction Youth Trust's social media platforms.
- Staff are strongly advised to make personal social media account(s) private to avoid attempted contact and/or interaction with young people. If staff have a public social media account(s), they are responsible for the content that they post and must be mindful that it could be viewed by a young person. Construction Youth Trust strongly advises all staff to consider whether the content of their social media accounts could be viewed as inappropriate.
- Any disclosure of abuse or safeguarding concern raised through social media, or a digital/online learning platform should be dealt with in the same way as face-to-face disclosure, following Construction Youth Trust's standard reporting

procedures.

3.

3.1. LinkedIn

Construction Youth Trust recognises the important of LinkedIn for a young person's professional development. Trust staff can assist young people with setting up a LinkedIn profile under the following circumstances:

- The young person is over 16 and is on one of our long-term coaching programmes.
- The young person has a genuine need to create a profile.
- Trust staff inform the young person that they cannot connect with Trust staff member's personal pages.
- Trust staff inform the young person that they should only connect with volunteers they meet through CYT programmes if there is a professional need (e.g. following work experience or prior to an interview).
-

Trust staff must not connect on LinkedIn with young people currently on CYT programmes. If a young person sends a Trust staff member a request to connect, they must decline the request. Trust staff can accept requests from young people formerly engaged on CYT programmes if there is a professional need (e.g. if a young person now works for an employer partner and/or volunteers with us).

4. Travel

It is the responsibility of Construction Youth Trust staff to clarify on the programme registration form if young people will be required to make their own way to and from a venue and ensure that they receive the required parental consent.

If Construction Youth Trust staff are required to travel with a group of young people without a teacher present, they must complete a specific Travel risk assessment. Two responsible adults must always travel with a group of young people, including one DBS checked member of Trust staff or a trusted partner, unless in the exceptional circumstances detailed below. The driver of a regulated taxi service can be considered another responsible adult.

In exceptional circumstances, a young person may be allowed to travel unaccompanied in a taxi/uber (for example back to their home, school/college, hospital, etc.) but only with the agreement of their parent/guardian, school, or other individual acting in loco parentis.

In a circumstance where a young person becomes ill whilst travelling and needs to disembark the transportation, a Construction Youth Trust staff member is required to accompany them and ensure they will remain within ear/eyeshot of another responsible adult at all times. If this is not possible, the entire group must also disembark and wait with the young person until alternative arrangements can be made.

5. Visits to Third-Party Sites

Construction Youth Trust understands the importance of facilitating visits to workplaces/construction sites to give young people the opportunity to gain insight into

the industry. The Trust has created a guide, relying on BuildUK and the ISO 45001 accreditations to support with vetting sites before facilitating a visit.

Trust staff must ensure that the employer hosting a site visit has both a certificate of Common Assessment Standard or an ISO 45001 before confirming any visit. If the employer has one of these, they will be considered a 'Credible Employer', from a safety perspective, for two years.

If the employer does not have either of these accreditations, Trust staff are required to complete a pre-visit safeguarding check, using the Trust's Pre-Site Visit Checklist one week in advance. Trust staff are required to consult the Third-Party Visit Guide before confirming any site/workplace visits.

6. First Aiders

All Construction Youth Trust delivery staff will receive Emergency First Aid at Work training, which is refreshed every 3 years.

7. Parental Consent

Parental consent will be sought for all programmes and activities involving young people under the age of 18 who are under the care of Construction Youth Trust. This can be via the parental consent form which details:

- All activities to be undertaken
- Location of activities
- Travel arrangements
- Supervision arrangements including any unsupervised times and activities
- Description of who the young people are likely to interact with (e.g. other young people from their school, young people from other schools, other young people, CYT staff, industry volunteers)
- When and how CYT staff will communicate directly with young person
- Any likely interaction with members of public
- Food & refreshment arrangements if relevant
- Photo consent
- Confidential email address that any safeguarding concerns can be reported to
- Information about External Opportunities and the due diligence

Construction Youth Trust coaches can alternatively obtain consent through phoning parents directly and asking for verbal consent for all the points covered by parental consent form. Construction Youth Trust staff must log this call on CRM so it can be identified and itemise what was specifically covered in the call.

Construction Youth Trust recognises that some young people may not be in contact with their parent(s), and thus, may allow in certain circumstances a referral partner to act in loco parentis and provide consent to take part in a programme on their behalf. This must be recorded as above.

Young people missing parental consent may only take part in 121 sessions, group activities, and visits to third-party sites if a school staff member actively participates. Young people without parental consent can only be taken on third-party visits if the school has provided consent in writing, acting in loco parentis. Coaches must create a risk assessment outlining the controls in place to ensure young people and others are kept safe.

8. Risk Assessing Individual Young People

For young people under the care of Construction Youth Trust, we will evaluate the risk of harm to the young people and to others prior to young person beginning any programmes, according to the below protocols. This includes working with referral partners, including schools, to identify in advance any possible risks and putting measures in place to control risks appropriately, such as:

- Any relevant child protection or safeguarding issues relating to the young person
- Significant health/medical issues
- Substance misuse issues
- Violent or aggressive behaviour
- Self-harming behaviour
- Criminal behaviour including gang involvement or sexual offences

The Trust's assessment of a young person's level of risk will be based on a comprehensive review of all available information, including the referral form, programme registration form, and any other information provided by the young person or their parent/guardian(s).

All information relating to a young person that has been identified as medium or high risk must be properly recorded and saved in the system appropriately. An individual risk assessment must be created for all medium or high-risk young people and be signed off by the CYT coach, their line manager, and the school/referral partner prior to any young person beginning any programmes.

8.1. Risk Assessing Learners from Schools

For school programmes, risk assessments will initially be carried out at a group level. Trust staff will ask the appropriate school contact to complete a group referral form indicating any significant risks or additional needs that staff should be aware of prior to beginning the programme. Trust staff will review the referral form and evaluate the risk level of the group. If any individual risk assessments are required, Trust staff must complete the risk assessment to be signed off by their line manager prior to beginning the programme, in agreement with the school. This does not include one-off in-school group sessions.

8.2. Risk Assessing Young People Referred by Our Partners

All referral partners will be asked to complete an individual referral form for each young person that they refer to identify any risks or issues that Trust staff should be aware of. Trust staff would contact the referral partner for a meeting if the information provided on the form is unclear or incomplete.

All referral partners will be required to help us assess the young person's level of risk, both regarding harm to themselves and to others, prior to the young person beginning a programme so that appropriate measures can be put in place. If a referral partner indicates that a young person is medium or high risk, or that any of the above risks apply to them, Trust staff must set up a meeting with the referral partner to complete an individual risk assessment. The individual risk assessment must be completed by the CYT coach, signed by their line manager and the referral partner, and uploaded to the young person's CRM page before they begin any programmes.

Construction Youth Trust staff will also ask the referral partner to inform us in what capacity they know the young person and for how long. If Trust staff deem their knowledge of the young person insufficient to create an informed risk assessment, they must ask the referral partner and/or young person to provide an alternative referee. If this cannot be provided or is information remains insufficient, staff must follow the below self-referral protocol.

8.3. Risk Assessing Young People Who Self-Refer

If a young person wishes to referral themselves to a Construction Youth Trust programme, Trust staff will initially ask the young person if they have a professional in their lives that can complete a referral form. If the young person can provide a professional referral (such as a social worker, GP, or Leaving Care worker) staff must follow the above protocol.

If the young person cannot provide a professional referral, Trust staff must ask them to complete a self-referral form and then require them to attend an informal interview to discuss their form at Construction Youth Trust office or a trusted partner premises. The interview must be conducted by at least two Trust staff members or a one Trust staff member and another professional from a trusted partner organisation. The young person may be accompanied by a parent or guardian if they wish. Staff must be alert to the potential risks of meeting an unknown individual and will put reasonable precautions in place.

Following the informal interview, Trust staff must create an individual risk assessment for the young person based on all available information. Trust staff must err on the side of caution until they get to know the young person better. All self-referrals will be deemed to be at least medium risk and individual risk assessments will be required for all young people who self-refer.

If Trust staff deem the young person to exhibit worrying signs of behaviour at any stage of the referral process, they must not allow the young person to join the programme unless they are able to provide a professional referral. Alternative provision, such as online support, may be provided until such time as Trust staff have a clearer picture of risks involved working with the young person.

8.4. Risk Assessing Groups of Individual Young People

Construction Youth Trust staff must assess the risk of every group of young people, based on all available information, and will put appropriate measures in place for group deemed to be medium or high risk. These might include:

- Reducing the ratio of adults to young people
- Arranging to have an induction prior to programme start
- Supervising lunches
- Supervising or managing access to toilet facilities
- Reducing exposure to public
- Minimising travel outside of immediate area etc.
- Always having a second colleague or other responsible adult (referral partner, volunteer, teacher) sitting in on one-to-one video calls

The risk level will be reviewed on a regular basis to ensure control measures continue to be appropriate.

7.5 Risk Assessing Young People Who Misuse Substances

Construction Youth Trust recognises that the construction and built environment industry has a no tolerance policy for drug and alcohol misuse and will often randomly drug test employees. To prevent a young person from being in an unsafe environment on site and to sustain strong relationships with employer contacts in the industry, Construction Youth Trust will not work with young people that have disclosed they recreationally misuse substances unless they are taking action to stop. In this situation, CYT staff to confirm that young person is availing of support before working with them. If a young person on a programme has previously disclosed substance misuse issues, CYT staff to check in with young person to ensure this is no longer the case.

7.6 Risk Assessment Escalation Process

Construction Youth Trust staff must ensure that all required risk assessments are completed and in a thorough manner. If appropriate risk assessments are not completed correctly, this will be escalated through the Safeguarding Team and to relevant SLT member, with SLT and HR deciding next steps.

7.7. Reviewing Individual Risk Assessments

Construction Youth Trust staff will review individual risk assessments regularly (at least every six months or sooner if made aware of a new or changed safeguarding concern relating to a young person) and must inform their line manager immediately if they have reason to believe the risks involved in working with the young person have changed. The risk assessment will then be updated, and appropriate measures put in place.

9. Physical Intervention

In the unlikely event physical intervention is needed when working with young people, it must only be used as a last resort when all other forms of intervention have not worked or are impracticable. Trust staff should ensure that they always maintain a non-confrontational manner when dealing with young people.

9.1. When it is Acceptable to Intervene

Physical intervention is only deemed necessary to prevent a young person from:

- Committing any offence
- Causing injury to, or damage to the property of, any person (including themself)
- Instigating others to cause injury or damage

Where possible a clear oral warning to the young person that physical intervention may have to be used should be given.

9.2. Types of Physical Intervention

The only types of physical intervention which are deemed to be reasonable are:

- Passive physical contact resulting from standing between two young people or blocking a young person's path.
- Active physical contact such as leading a young person by the hand or arm; ushering a young person away by placing a hand in the centre of their back.
- And, only in the most extreme circumstances, using an appropriate restrictive hold.

9.3. Reasonable Intervention

Decisions on whether circumstances justify the use of reasonable physical intervention/contact will depend on:

- The seriousness of the incident.
- The chances of achieving the desired result by other means.
- The relative risks associated with physical intervention compared to using other strategies.

All incidents where physical intervention has been used must be reported following standard procedures.

10. Other Physical Contact with Young People

Although physical contact with young people is not encouraged, there are circumstances where appropriate professional physical contact is deemed acceptable:

- When comforting a distressed young person.
- When congratulating or praising a young person.
- When demonstrating how to use tools or equipment.
- When giving first aid (appropriate personal protective equipment will be worn).

11. Accepting Gifts from Young People

The Trust recognises there may be times when a young person wishes to thank a Trust staff member for their support in the form of a gift. If a Trust staff member receives a gift from a young person, they must open the gift immediately in front of another Trust staff member, referral partner or teacher. Gifts of relatively low value (worth £10 or under) are appropriate to accept. However, there are some types of gifts which are not appropriate to accept. Acceptable gifts could include chocolates and flowers. Unacceptable gifts could include money, alcohol, or personal items such as a framed photo.

Trust staff are expected to make a judgement on the price/nature of gift and decide whether they feel comfortable to accept the gift. If an unacceptable gift is offered, Trust staff are to compassionately inform the young person that they are unable to accept the gift due to our safeguarding policy and report it as a safeguarding incident via the reporting procedure. Trust staff must inform the teacher/referral partner about a gift offering, whether the gift is accepted or declined.

Any gift accepted by Trust Staff must be declared to the Finance and Central Resources Manager in accordance with the Trust's Conflict of Interest Policy.

Appendix 3: Safeguarding Code of Conduct

All staff have a duty of care for the physical and mental well-being of all young people taking part in our Activities/Programmes. For the purpose of child protection, a young person is recognised as a child up to the age of 18 years or a vulnerable adult.

All Construction Youth Trust staff must sign up to this code of conduct as part of their annual safeguarding disclosure process. It covers all interaction with young people as well as

delivery of Construction Youth Trust programmes. This includes sessions delivered live, virtually on streams/webinars, or pre-recorded content for beneficiaries to access on demand, as well as interactions on the telephone, via email or in-person.

1. **Your Safeguarding Responsibilities**
    - Ensure the general safety and wellbeing of students and all those who come in to contact with them.
    - Ensure you are familiar with and adhere to all relevant safeguarding policies and procedures including those involved in recognising and reporting incidents.
    - Ensure young people on our programmes are aware of how to raise any safeguarding concerns and how the concern will be dealt with.
    - Ensure full and appropriate risk assessments are in place before undertaking any activity involving young people and/or vulnerable adults and that preventive and protective measures identified in risk assessment are followed for all activities.
    - Report all concerns, without judgement about their significance, to the DSL or Deputy DSL, via the reporting procedure.
    - Ensure that volunteers, freelancers and third-party providers are aware of Construction Youth Trust's safeguarding policy and know how to recognise any concerns and report them.
    - Adhere to appropriate confidentiality.
    - Undertake appropriate training and refresher training annually.
    - Ensure no child is left unsupervised with a person who has not been DBS checked.

2. **Safeguarding Protocols**
    - All activities involving young people will be supervised by at least one DBS verified member of the Trust Team or trusted partner organisation (also DBS verified).
    - Groups of young people will not be supervised by a single adult working alone at any time unless the group is within sight and/or earshot of other adult(s) e.g., a staff member could work with a small group of young people in a separate area if there is an open door/window to other staff members.
    - One-to-ones will be carried out only in Construction Youth Trust offices or on the premises of trusted partner organisation whose staff are aware in advance that Construction Youth Trust will be carrying out one-to-ones. One-to-ones will not be carried out in public places.
    - One-to-ones to be held within sight and/or earshot of other responsible adults who are aware that the session is happening and the context of the meeting.
    - Construction Youth Trust requires staff to log all communications with young people, including face-to-face and online sessions, emails, calls, and text/WhatsApp messages, on CRM. All communication with young people must take place through professional laptop and mobile devices.
    - Staff should avoid communicating with young people outside of normal office hours, except in specific exceptional circumstances (see Appendix 3).

Breaches of the Trust's safeguarding policy, protocols and Code of Conduct will be reported to the DSL and the CEO. Serious and persistent breaches will be dealt with via Trust's disciplinary and HR processes.

Appendix 4: Safer Recruitment Procedures

Safer Recruitment is an important aspect of safeguarding young people. Construction Youth Trust is committed to following the below procedures in the four key stages to ensure Safer Recruitment processes for all positions that may involve direct contact with young people.

1. Safer Recruitment Process

1.1. Deter

Construction Youth Trust ensures that our commitment to safeguarding children, young people, and vulnerable adults is widely promoted. The Trust's Safeguarding Policy is available on our website, as well as on request.

Construction Youth Trust is committed to safeguarding and promoting the welfare of children, young people, and vulnerable adults. We will only consider candidates for employment that share this commitment. All roles are subject to safer recruitment practices, and this position will require an Enhanced Disclosure and Barring Service (DBS), where appropriate.

All applicants are sent an Application Pack which includes:

- A Job Description that includes the post holder's individual responsibility to safeguard and promote the wellbeing of children, young people, and vulnerable adults in their care
- A Person Specification that highlights we are seeking candidates who support the Trust's mission and share our commitment to safeguarding and promoting the welfare of children, young people, and vulnerable adults
- Confirmation that a DBS check will be carried where relevant
- Confirmation of Probation Period (for longer-term contracts only)
- A copy of our Safeguarding Policy
- Applicants are required to complete an Application Form which includes:
- A section that fully identifies the individual concerned
- A full employment history with all employers and dates
- An education/training history including qualifications obtained with dates and institutions
- A section that asks applicants to set out their suitability for the role as per the Job Description and Person Specification
- A separate self-declaration of convictions and cautions, and a signed statement that they are not barred from working with any vulnerable groups
- The names and contact details of at least two referees including their current or most recent employer (and a statement to the effect that referees will be asked about whether the applicant has been the subject of any safeguarding concerns)

If applicants apply with a CV only and are considered for the interview long-list, they will be asked to complete an Application Form in good time so it can be properly reviewed before interview.

1.2. Reject

All applications will be considered carefully by the selection panel before being long listed for interview. Applications that have been long listed for interview are scrutinised by at least two members of Trust staff, referring to the Job Description and Person Specification. Staff identify any concerning inconsistencies or gaps with dates in employment history to flag in interview.

All interviews are carried out by at least two members of Trust staff, including at least one member of staff who has completed Safer Recruitment training. In addition to standard questions that all candidates are asked, the selection panel also ask questions related to the candidate's individual application, probing any inconsistencies or gaps in dates. Any areas of concern arising from the application form or from what the candidates says during the interview will be explored in further detail. Following the interview, the selection panel will have a full discussion on all candidates.

A second interview may also be carried before final selection is made.

The applicant's self-declaration of convictions and cautions is not considered by the selection panel as part of the initial interview process. After the initial interview process, the selection panel will be made aware of any previous convictions or cautions for any candidate(s) still being considered, and an open and measured discussion will be had with the candidate in a separate meeting or as part of a second interview. Any applicant who would pose a risk to children, young people, or vulnerable adults and/or is barred from working with any of the above groups must be screened out at this point. The process for Adverse Information Risk Assessment is detailed below.

No applicant will be selected unless all members of the selection panel are satisfied that there are no areas for concern in relation to safeguarding.

1.3. Prevent

Once the selection has been made and the successful candidate has been approved by the CEO, candidates are informed that any job offer is conditional on the following:

- At least two satisfactory references
- A satisfactory enhanced DBS check, including a criminal record check for any period that the candidate lived or worked outside of the UK for 6 months or more while over the age of 16
- Proof that the candidate is entitled to work in the UK

The selection panel will discuss the most relevant references to seek with the candidate, which may include additional or different referees to those offered on the original Application Form. The Trust will always seek employment focused references first, one of which should be the candidate's current/most recent employer. If the candidate's employment with their current/most recent employer is/was less than 6 months or is an unrelated role to the position applied for, the selection panel may request the candidate provides an alternative or additional reference from a more relevant employer (e.g., a previous role working with young people). Character references from a person of standing known to the candidate in a professional capacity (e.g., University Lecturer or teacher) may be considered, but usually only when employment references are not available.

All referees are specifically asked about the candidate's suitability to work with children, young people, and vulnerable adults and whether they are aware of any safeguarding concerns in relation to the candidate. References will only be deemed acceptable by the Trust if the referee is willing and able to offer appropriate assurances in this area.

Additionally, all references will be thoroughly checked to ensure:

- The information provided is consistent with candidate's application form (e.g., dates of employment, details of referee)
- The referee has known the applicant for a reasonable period of time
- The referee is authorised and/or appropriate to provide the reference
- The referee's email address matches the format used by the relevant organisation (e.g., employer or university email format)

If there are any questions or concerns in a reference, the Trust will follow up with the referee by phone to clarify (or by email if a phone call is not possible or appropriate). All discrepancies will be explored to ensure there is a reasonable explanation. If necessary, the candidate will be asked to correct/amend the details on their Application Form accordingly and a written record of feedback from referee will be retained.

Additional references, including character references, can also be sought if deemed necessary.

If any questions or concerns in relation to safeguarding remain, the potential candidate will be required to have a discussion with the DSL before proceeding with employment. The Adverse Information Risk Assessment process may also be followed.

No applicant's employment will be confirmed unless all members of the selection panel are satisfied that they have no areas for concern in relation to safeguarding. Before formally confirming employment, the identity of the candidate is verified in person using photo identification. Documentation that proves the candidate is eligible to work in the UK is also sought.

Following the candidate's acceptance of the conditional offer, an appropriate DBS check will be requested, dependent on the role and duties of the candidate. Additional criminal records checks will be made for individuals who have lived or worked outside of the UK for at least 6 months while aged over 16 years. If the official routes for obtaining an International Criminal Record check are unavailable, the Trust in these circumstances will explore alternative avenues with the relevant official body (e.g. on official advice in Ireland, request the candidate make a 'Subject Access Request' directly to the GARDA). Appropriate DBS/criminal record checks must be completed within 30 days of employment commencing and, until they are completed to the satisfaction of the Trust, no employee will be left unsupervised with young people. If the checks are not completed with 30 days, an Adverse Information Risk Assessment will be carried out.

If the DBS or other criminal records check process raises any issues or questions, these will be explored in an open and measured discussion with the candidate. If there are any unresolved concerns at this stage, including if it becomes clear that the candidate failed to reveal information or was untruthful in their application, the conditional offer will be rescinded. Records of all pre-employment checks will be retained.

1.4. Observe & Supervise

All new starters are given a timetabled induction, of which safeguarding is a central feature. All Construction Youth Trust staff are required to complete external safeguarding training, as well as internal training on our Safeguarding Policy. Safeguarding is a standard topic at the monthly staff meeting as well as in additional training sessions to relay any changes to procedures or policies.

All staff have an identified line-manager who ensures they are closely observed and supervised, particularly during their probation period.

The Trust requires all employees that come into contact with young people to update their DBS check on a regular basis, at least every three years. Additionally, all employees are required to complete an Annual Safeguarding Check which will include a Declaration of Criminal Record Status.

Employees in relevant positions are made aware that they must inform the Trust immediately of any criminal convictions, warnings, or reprimands that could affect their DBS status. Employees are asked to disclose at the earliest possible opportunity any situation that has the potential to lead to a criminal conviction or has the potential to undermine the Trust's confidence, and the confidence of our partners, in that individual's suitability to work with children, young people, and vulnerable adults.

2. Adverse Risk Assessment Process

Construction Youth Trust acknowledges that situations may arise when information is brought forward that could potentially affect an individual's suitability for employment at an organisation with safeguarding at its core. This could apply to a potential candidate applying for a job or an existing employee. For example:

- Information is declared by a candidate within the criminal record self-declaration
- An offence is highlighted within a DBS check
- A reference raises a concern about an individual's suitability to work with children
- A current employee informs the Trust that that an allegation has been made against them, or they have been arrested etc

It is disclosed to the Trust that a current employee has been convicted of an offence or has received a warning or reprimand outside of work. This process may also be used where there are gaps in the information the Trust is able to obtain about a candidate/employee (e.g. references, criminal checks).

If the post is covered under the Rehabilitation of Offenders Act 1974, careful consideration must be given as to whether a criminal record should prevent an individual from continuing with their appointment/job role.

Some disclosures, as detailed below, are of such a nature that it is deemed to constitute an automatic bar from employment. For all other offences, examples of which are listed below, an adverse risk assessment will be undertaken. Please note the following is not an exhaustive list.

Automatic Bar from Employment	Adverse Information Risk Assessment
Unspent or spent sexual offences	Spent offences relating to the supply of drugs
Unspent offences relating to the supply of drugs	Unspent or spent offences relating to the possession of drugs
Disqualification Order not to work with children and/or vulnerable adults	Unspent or spent offences relating to theft or dishonesty
Previous dismissal in relation to abuse of or failure to take proper care of clients	Previous disciplinary action in relation to abuse of or failure to take proper care of clients

Entry on the Registers created by the Protection of Children Act 1999 or the Care Standards Act 2000	Previous disciplinary action in relation to dishonesty
Entry on the Sex Offenders Register	Unspent or spent offences relating to violent behaviour e.g., assault
	Unspent or spent driving offences

If an Adverse Information Risk Assessment is required, a Senior Manager will arrange for a discussion with the applicant/current colleague to assess the details around the nature of the offence, alleged offence, or concern raised. They will keep a thorough record of this discussion using the Adverse Information Risk Assessment template below.

This discussion must include the following:

- The nature of the offence(s)/alleged offence(s)/issue(s) raised.
- The circumstances surrounding the offence(s)/alleged offence(s)/issue and any explanation(s) offered.
- Whether the conviction/issue is relevant to the position applied for/current role
- The seriousness of any offence/issue disclosed.
- The age of the applicant at the time of the offence(s)/issue.
- The length of time since the offence(s)/issue occurred.
- Whether the individual has a pattern of offending behaviour, where relevant
- Whether the individual's circumstances have changed since the offending behaviour/issue arose.
- If a current employee, any relevant record at work.

The Senior Manager will consider the information ascertained during this discussion and put forward a recommendation to the Trust's Safeguarding Trustee as to whether the candidate/employee should continue to the next stage of the recruitment process or continue in their role, and any recommended control measures if so (e.g. supervision, regular check-in/monitoring meetings, training or support such as counselling if needed).

The Trust's Safeguarding Trustee will make the final decision which will be recorded in the Adverse Information Risk Assessment template.

In the event of an issue arising for a colleague currently employed, the Trust would consider undertaking a fresh DBS check in order to be as fully informed as possible when assessing the situation.

The Trust's disciplinary procedures will be followed for decisions relating to the employment of existing employees where appropriate.

Appendix 5: Adverse Risk Assessment Template

To be completed by Senior Manager conducting Adverse Information Assessment:

Employee/Candidate Name	
DBS Disclosure Number (if applicable)	

Current Position/Position Applied For	
Date Offence/Alleged Offence/Issue(s) Took Place	
At what stage did the applicant/employee declare?	□ Interview Stage □ DBS Application Stage
Senior Manager's recommendation as to whether the applicant/employee should proceed to the next stage of recruitment/continue in role. If recommendation is to proceed/continue, please outline any recommended control measures e.g. supervision of face to face delivery with YP. NB: Advice can be sought from HR.	
Signed (Senior Manager):	
Date:	
Please indicate if it was necessary to inform/consult our insurers: Yes/No If yes, detail outcome:	

To be completed by Designated Safeguarding Trustee:

Trustee's decision as to whether the applicant/employee should proceed to next stage of recruitment /continue in role. If decision is to proceed/continue, please outline any control measures to be put in place e.g. supervision of face to face delivery with YP.
Reasons for Decision:
Signed:
Date:
Please indicate if it is necessary to inform other trustees of decision: Yes/No

Appendix 6: Annual Safeguarding Review & Disclosure Form

Construction Youth Trust staff are required to annually complete a Declaration of Criminal Status and Annual Safeguarding Review form.

Annual Safeguarding Check

Name			**Date:**		
Date of most		**Date Safeguarding**		**Date Staff Code**	

recent DBS check		**Training refreshed**		**of Conduct reviewed**	

Annual Safeguarding Policy Review and Staff Code of Conduct declaration – please tick as appropriate

I have read, understood and agree to abide by the Construction Youth Trust Safeguarding Policy including the Staff Code of Conduct as detailed in the policy.

☐ Yes ☐ No

Annual Criminal Record Self-declaration

For all positions working, or potentially working, with children and other people in vulnerable circumstances, the Trust is entitled to know on an on-going basis about any cautions and convictions that might affect your DBS status and/or suitability to work with children.

A criminal record will not, in itself, automatically lead to the removal of an employee from their position, unless they pose a risk to and/or are barred from working with children and vulnerable groups. The Trust is committed to taking an open and measured approach if a current employee discloses an offence or any other matter arises that might be relevant to their position. Please refer to the Trust's Safeguarding Policy for our adverse information risk assessment protocols.

You must inform the Trust immediately of any criminal convictions, warnings, reprimands that could affect their DBS status. Employees are asked to disclose at the earliest possible opportunity any situation that has the potential to lead to a criminal conviction or, otherwise, has the potential to undermine the Trust's confidence, and the confidence of our partners, in that individual's suitability to work with children and other vulnerable groups. This information will be discussed with sensitivity and confidentiality. Failure to reveal information that is not protected (including convictions, cautions, reprimands or final warnings) could lead to disciplinary proceedings/dismissal.

Please see our Equalities Policy for our policy on recruiting and employing ex-offenders.

Please tick as appropriate

Do you have any convictions, cautions, reprimands or final warnings which are not protected as defined by the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (as amended in 2013)?

☐ Yes ☐ No ☐ None not already declared and discussed with the Trust

Are you aware of any situation that has the potential to lead to a conviction, caution, reprimand or final warning or, otherwise, undermine the Trust's confidence, and the confidence of our partners, in your suitability to work with children and other vulnerable groups?

☐ Yes ☐ No ☐ None not already declared and discussed with the Trust

If you answered Yes to either question, please contact the Trust's HR team immediately for a confidential discussion on the matter.

DECLARATION - I declare that the information provided on this form is correct. I understand that the declaration of a criminal record will not necessarily prevent me from carrying out my role at Construction Youth Trust.

Signed: