Safeguarding Policy (Children & Vulnerable Adults)

KBM Training & Recruitment Limited (KBM) is dedicated to upholding the highest standards and taking all reasonable measures to ensure the safety and well-being of children, young people, and adults participating in our learning services. We are committed to fulfilling our social and moral obligations to safeguard such individuals fully in accordance with the law, and where necessary, with the assistance of relevant external agencies.

This policy outlines KBM's approach to safeguarding and promoting the welfare of children and vulnerable adults. It encompasses all facets of our operations and applies to everyone associated with KBM, including permanent and temporary employees, subcontractors, and other stakeholders. We prioritize promoting the well-being of adults, considering their views, wishes, feelings, and beliefs as appropriate. Our organizational culture encourages the identification and review of near misses to facilitate continuous learning and improvement.

We regularly provide mandatory training and awareness sessions on Safeguarding/Prevent to our staff and apprentices/learners. Every child, young person, and adult, without exception, has the right to protection from abuse, regardless of age, disability, gender, marriage and civil partnership, pregnancy and maternity, race, religion and belief, gender, sexual orientation, or socio-economic background.

We endeavor to foster a positive learning and working environment where individuals can be their authentic selves and engage in learning and work without fear of harm. Our recruitment process ensures that employees are carefully vetted, trained, supervised, and appropriately screened through Disclosure and Barring Service (DBS) checks where required. All employees are expected to adhere to the Company's Safeguarding Code of Conduct and to proactively respond to any allegations in accordance with our reporting procedures.

This Safeguarding policy also addresses County Lines compliance. KBM staff are briefed on various risk factors associated with serious violence, such as male gender, frequent absence or permanent exclusion from school, history of child maltreatment, and involvement in criminal activities like theft or robbery. Guidance on addressing these issues is provided through resources such as the Home Office's Preventing youth violence and gang involvement and Criminal exploitation of children and vulnerable adults: county lines guidance.

Designated Safeguarding Lead (DSL): Waqas Yaqoob, Senior Manager (Operations)

Scope and purpose

This policy applies to:

- KBM learners, apprentices and customers.
- employees (individuals who work – or have applied to work for the company either on a permanent, temporary, contractual or voluntary basis);
- employers (organisations that work in partnership with us)

- suppliers (external partners)
- external stakeholders and visitors

The purpose of this policy is to set out our approach to safeguarding children, young people and adults and protecting them from a range of potential harm.

Company's safeguarding principles

The Company's Safeguarding Policy and associated policies are based on the following principle:

- The welfare of children, young people and vulnerable adults are the primary concern
- All children, young people and vulnerable adults have the right to protection from abuse
- It is the responsibility of experts to determine whether abuse has taken place, but it is everyone's responsibility to raise/report any concerns using the appropriate procedures outlined in this policy
- All incidents of suspicious practice and allegations must be taken seriously and responded to swiftly and appropriately
- All personal information must be kept confidential and handled in line with the UK GDPR, the Data Protection Act 2018, and the Human Rights Act 1998, ensuring the privacy and rights of learners and staff are fully respected.

Definitions and terms of abuse

Child - A child is defined as someone who has not reached 18 years of age.

Young Person - A young person is defined as someone normally between 14-17 years of age.

Vulnerable Adult - Following the Protection of Freedoms Act 2012 the definition of regulated activity relating to adults no longer labels adults as 'vulnerable'. Instead, the definition identifies the activities which, if any adult requires them, lead to that adult being considered vulnerable at that particular time. This means that the focus is on the activities required by the adult and not on the setting in which the activity is received; or the personal characteristics or circumstances of the adult receiving the activities or the frequency in which they receive the service. An adult is defined as vulnerable when they are in receipt of a 'regulated activity' in relation to vulnerable adults. Regulated activity is therefore defined by the following 6 broad categories:

1. Providing health care
2. Providing personal care
3. Providing social work
4. Assistance with cash, bills and/or shopping
5. Assistance in the conduct of a person's own affairs

6. Providing transportation of individuals where that transport is provided because of age, health or disability

For more information, please refer to the Safeguarding Vulnerable Groups Act 2006, as amended by the Protection of Freedoms Act 2012, which outlines the framework for safeguarding adults and children in regulated activity.

For serious violence, we use further advice for schools and colleges provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance.

Discriminatory Abuse

Discriminatory abuse includes psychological abuse, harassment and discrimination which is motivated by a person's age, gender, disability, sexual orientation, race, cultural background or religion. Discrimination may be a motivating factor in other forms of abuse such as domestic violence or hate crime.

Where the abuse or neglect is motivated by age, gender, sexual orientation, immigration status, racial, religion or disability; or occurs in a domestic violence situation; or perceived as a Hate Crime: the abuse will be considered to be aggravated by these factors.

Discriminatory abuse can be in the form of personal or institutional discrimination. Personal discrimination is the prejudice of the individual, whereas, Institutional discrimination is where systems and structures directly discriminate against potential or actual users of a service.

Signs and symptoms of Discriminatory Abuse can include:

- fearfulness expressed in the eyes, person avoids looking at the potential abuser, flinching on approach
- emotional withdrawal
- sleep disturbance
- low self-esteem
- unexplained fear or defensiveness
- isolation / shunning by others
- threats or intimidation, bullying or shouting
- unexplained attacks on property or possessions
- continual favouritism to other people in preference to the individual
- internalising the discrimination to the extent that they express similar discriminatory views about others

Other types of Abuse which could be considered Discriminatory:

Hate Crimes: any incident which constitutes a criminal offence which is perceived by the victim or any other person as being motivated by prejudice and hate.

Ageism: discrimination based on age, especially against the elderly.

Gender Discrimination: is a belief that one sex is superior to the other and that the superior sex has endowments, rights, prerogatives and status greater than those of the inferior sex.

Homophobia: discrimination against (fear or dislike of) homosexual people and homosexuality

Transgender Discrimination: discrimination against people who are transgender

Religious Intolerance: is either intolerance motivated by one's own religious beliefs or intolerance against another's religious beliefs or practices.

Racism: the belief that all members of each race possess characteristics or abilities specific to that race, especially so as to distinguish it as inferior or superior to another race or races.

Disablism: discriminatory, oppressive or abusive behaviour arising from the belief that disabled people are inferior to others.

Physical Abuse

Physical Abuse is the physical mistreatment of one person by another which may or may not result in physical injury. Physical abuse includes assault, hitting, slapping, scratching, pushing, kicking, pinching, burning, force-feeding, misuse of medication or the withholding of medication or treatment, unwarranted or inappropriate restraint, forced isolation or inappropriate sanctions, unwarranted or unauthorised deprivation of liberty, false imprisonment or abduction, rough handling causing injury or any injury not fully explained by the history given.

Signs and symptoms of Physical Abuse can include:

- unexplained bruises or welts on body, including face, lips, mouth, body, arms, back, buttocks, thighs
- bruises in various stages of healing, clusters forming regular patterns, reflecting the shape of an article or finger marks
- unexplained burns, especially on soles, palms and back, immersion burns, rope burns, electric appliance or carpet burns
- unexplained fractures to any part of the body, especially if in various stages of healing, multiple or spinal injuries
- unexplained lacerations or abrasions to the mouth, lips, gums, eyes, external genitalia
- recoiling from physical contact or flinching
- malnutrition – rapid or continuous weight loss, insufficient supply of food on premises, dehydration, complaints of hunger
- lack of personal care, inadequate or inappropriate clothing, inadequate heating
- untreated medical problems
- unmanaged urinary / faecal incontinence
- signs of medication misuse such as drowsiness
- use of furniture and other equipment to restrict movement

Other types of Abuse which could be considered Physical:

Domestic Violence: any incident, or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are, or have been intimate partners, or family members regardless of gender or sexuality;

Forced Marriage: A marriage conducted without the free and valid consent of one or both parties, where duress, coercion, or pressure is involved. Forced marriage is a violation of internationally recognised human rights and is prohibited under the Matrimonial Causes Act 1973 and the Forced Marriage (Civil Protection) Act 2007.

'Honour' Based Violence: An incident or crime committed to protect or defend the perceived honour or "izzat" of a family or community. HBV is distinct from other forms of violence, as it often involves collusion or complicity from family or community members. It can include harassment, assault, unlawful imprisonment, forced marriage, forced pregnancy or abortion, unexplained death, and, in extreme cases, murder. Such violence typically occurs when the family believes the individual has acted in a way that dishonours them, and the act is intended as punishment. For more information about honour based violence visit Karma Nirvana's website www.karmanirvana.org.uk

Environmental Abuse: includes depriving someone of their liberty, sustained restrictions on a person's freedom of movement as a result of the physical environment the person is in, culture of the environment or institution. It can also mean a child living without expressions of love, living in unsuitable / unclean accommodation.

Sexual Abuse

Sexual abuse is the involvement of individuals in sexual activities to which they have not had the freedom and capacity to give their informed consent to, before and during the act, and/or may not fully comprehend. These acts include rape and attempted rape, sexual assault by penetration, sexual assault, abuser touching the victim's body for their own gratification, indecent exposure, non-contact abuse (pornography), and sexual harassment, causing or inciting a person to engage in sexual activity without their consent. The use of social media and the internet has introduced 'cyber' sexual abuse such as 'sexting' and un-authorised sharing of sexual images.

Signs and symptoms of sexual abuse can include:

- full or partial disclosure or hints of sexual abuse
- signs of depression, stress
- recoiling from physical contact
- unusual difficulty in walking and sitting
- sexually-transmitted disease, urinary tract / vaginal infections
- love bites, bruises or finger marks on thighs or arms
- significant change in sexual behaviour, language or outlook
- fear of males or females

- pregnancy in a person who is not able to consent
- Worries over social media content and sharing of personal content (see Cyber Abuse)

Other types of Abuse which could be considered Sexual:

Female Genital Mutilation: (FGM) is a collective term for procedures which include the removal of part or all of the external female genitalia for cultural or other non-therapeutic reasons.

Sexual Exploitation: Sexual exploitation of young people and vulnerable adults involves exploitative situations, contexts and relationships where the vulnerable person receives 'something' (e.g. food, accommodation, drugs, alcohol, SIM cards and mobile phones, cigarettes, affection, gifts, money) or perceived friendship/boyfriend as a result of them performing, and/or others performing on them, sexual activities.

We adhere to Child Criminal Exploitation (CCE) paragraphs 33, 34, and 35 as given below:

- 33. Specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, pickpocketing, committing vehicle crime, or threatening/committing serious violence against others.
- 34. Children can become trapped in criminal exploitation because perpetrators may threaten them or their families, entrap them in debt, or coerce them into carrying weapons for "protection." Children involved in criminal activity as a result of exploitation may not always be recognised as victims by adults or professionals, especially older children. Even if the child appears to have agreed to the activity, they may still be a victim of CCE.
- 35. Girls' experiences of criminal exploitation can differ from boys'. Indicators may not be the same, but professionals should recognise that girls are also at risk. Both boys and girls involved in CCE may be at an increased risk of sexual exploitation, and safeguarding measures should reflect this.

Psychological / Emotional Abuse

Psychological or emotional abuse is action or neglect by a person which impairs the psychological wellbeing of another person. This results from being repeatedly made to feel unhappy anxious afraid humiliated or devalued by the actions or inactions and/or attitudes of others and includes emotional abuse, threats of harm or abandonment, deprivation of contact, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks. People who use social media can be at risk from being humiliated or abused 'on-line'

Signs and symptoms of Psychological/Emotional abuse can include:

- fearfulness expressed in the eyes, avoids looking at the caregiver, flinching on approach
- ambivalence to carer
- emotional withdrawal
- sleep disturbance
- low self-esteem
- unexplained fear or defensiveness
- threats or intimidation, bullying or shouting
- significant pressure on a person to commit criminal acts
- threat to abandon person or put them "away"
- promises which are not kept
- few visitors, phone calls or outings
- locking the person in at home, or in a car
- significant community pressure for example anti-social behaviour
- Withdrawing from on-line or reality social groups (see Cyber Abuse)

Other types of Abuse which could be considered Psychological:

Anti-Social Behaviour: acting in a manner that caused or was likely to cause harassment alarm or distress to one or more persons not of the same household as the defendant.

Discriminatory Abuse: as described above

Cyber Abuse: We monitor IT usage at KBM/the use of technology and social networking sites to threaten, bully, harass, groom for exploitation, stalk, pose risks to personal safety and wellbeing or discriminate against an adult at risk. This could be through the use of a PC, laptop, tablet, mobile phone, gaming console or television with internet access. Threats can come through content, contact and conduct. This includes text messages, phone calls, pictures, video clips, emails, chat room messages, instant messaging and websites. Signs and symptoms can include spending long periods of time online, secrecy about a mobile phone and/or computer, withdrawal from social contact, depression, mood swings, unexplained gifts, sleep disturbance and self-harming.

Financial or Material Abuse

Financial abuse is the misappropriation of an individual's funds, benefits, savings, assets etc. or any other action that is against the person's best financial interests. This includes theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, denying access to money, or the misuse or misappropriation of property, possessions or benefits.

Signs and symptoms of Financial/Material Abuse can include:

- unusual or inappropriate bank activity
- a Power of Attorney obtained when a person is unable to comprehend
- recent change of deeds or title of house
- person lacks belongings or services which they can clearly afford

- recent acquaintances expressing sudden or disproportionate affection for a person with money or property
- carer asks only financial questions of the worker, does not ask questions about care
- withholding money
- person managing financial affairs is evasive or uncooperative.

Neglect and Acts of Omission

Neglect is the deliberate withholding or unintentional failure to provide appropriate and adequate care and support to a child or vulnerable adult. Under Section 44 of the Mental Capacity Act 2005, which remains in force, "Anyone who has a duty of care to a person who lacks capacity is guilty of an offence if they deliberately or recklessly ill-treat that person or willfully neglect that person."

It does not matter whether the behaviour was likely to cause, or actually caused, harm or danger to the victim's health. Willful neglect usually means that a person has deliberately failed to carry out an act they knew they had a duty to do.

Signs and Symptoms of Neglect and Acts of Omission can include:

- physical condition of the person is poor
- unexplained or untreated deterioration in health and wellbeing, including not seeking appropriate medical attention
- inadequate heating or lighting
- poor personal hygiene
- malnutrition – loss of weight
- dehydration
- demanding food or drink
- pressure sores
- inconsistent or reluctant contact with health or social agencies
- lack of social support and/or refusal to arrange access to callers / visitors
- inappropriate, old or shabby clothing, or being kept in night clothes during the day
- sensory deprivation, not allowed to have hearing aid, glasses or other aids to daily living
- accumulation of medication, or prescriptions not being collected from pharmacy
- increased number of incidents or accidents e.g. falls or physical altercations with others, which appear to have resulted from a lack of supervision both inside and outside of the home environment

Extremism and Radicalisation

Since 2010, when the UK Government published the Prevent Strategy, there has been a continued focus on safeguarding children, young people, and families from violent extremism. Both locally and nationally, extremist groups have attempted to radicalise vulnerable children and young people, promoting extreme views that may justify political, religious, sexist, or racist violence, or steering them into rigid ideologies that are intolerant of

diversity. These factors leave young people at risk of further radicalisation. KBM recognises this risk and implements safeguarding measures in line with the Counter-Terrorism and Security Act 2015 (Prevent Duty) and current statutory guidance to identify and protect vulnerable learners.

KBM values freedom of speech and the expression of beliefs / ideology as fundamental rights underpinning our society's values. Individuals have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

The normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation. KBM is clear on its legislative and moral duty to view exploitation and radicalisation as a safeguarding concern and act accordingly.

Signs and Symptoms of Extremism or Radicalisation can include:

- being in contact with extremist recruiters;
- accessing violent extremist websites, especially those with a social networking element;
- possessing or accessing violent extremist literature;
- using extremist narratives and a global ideology to explain personal disadvantage;
- justifying the use of violence to solve societal issues;
- joining or seeking to join extremist organisations; and
- significant changes to appearance and/or behaviour;
- experiencing a high level of social isolation, resulting in issues of identity crisis and/or personal crisis

Further, this policy incorporates the Keeping Children Safe in Education (KCSIE) 2025 statutory guidance, which came into force on 1 September 2025. KBM complies with the current requirement that children's social care assessments consider harm occurring outside the home, recognising that abuse or exploitation can take place in wider contexts such as peer groups, the community, or online environments. Schools and training providers should provide comprehensive information as part of the referral process to support a contextual safeguarding approach that considers all available evidence to protect the child. Additional guidance is available here: Contextual Safeguarding (contextualsafeguarding.org.uk)"

KBM has a separate policy to ensure we comply with and support CONTEST, the Government's Counter Terrorism Strategy and in particular the PREVENT strategy to stop people from becoming terrorists or supporting terrorism.

Procedure for reporting

KBM Safeguarding – PREVENT reporting procedure which details the procedure to be followed when dealing with child protection, safeguarding and PREVENT reporting. In order to ensure appropriate action is taken in such circumstances KBM has adopted and utilised the principles of the 5 R's model below:

Recognition

- Recognition covers both disclosures of abuse and your personal concerns about a learners welfare
- Disclosure of abuse is likely to be direct
- A concern that you have may arise from either a conversation or a change in a learners behaviour

Response

- Do not interview - just listen and clarify if necessary
- Remain calm and listen
- Inform the person that the concerns must be recorded and passed on so that the issue can be dealt with
- Reassure the person that they have done the right thing in reporting their concerns and that you will do everything you possibly can to help
- Do not make unrealistic promises around confidentiality

Reporting

- All disclosures must be reported to Waqas Yaqoob, Designated Safeguarding Lead at waqas.yaqoob@kbmgroup.co.uk.
- Urgent safeguarding concern, please call on 020 8992 4506
- DO NOT DISCUSS THE DISCLOSURE WITH ANYONE ELSE
- Safeguarding Children and Vulnerable Adults Disclosure/Concern Form given as Annex-1 will be used for reporting.

Recording

Record precisely what has been alleged/happened - use the words of the learner

- This should be scanned and emailed to the Designated Safeguarding Lead. The original should also be sent in a sealed envelope and marked as confidential. It should not automatically be added to a learner/employer file and copies should not be made
- Your record should use accurate quotation
- If appropriate, include factual observations
- Once you have reported concerns using this process it is the responsibility of the Designated Safeguarding Lead to take any further decisions as to the actions which would follow. This may or may not directly involve you.

Referral

- Only a Designated Safeguarding Lead can make the decision to refer a complaint or allegation having gathered and examined all relevant information
- Only a Designated Safeguarding Lead should look into a complaint, allegation or suspicion of abuse. Actions carried out by others could be construed as unjustified interference which could jeopardise an investigation and any possible subsequent court case
- No employee is in a position to decide whether abuse has taken place

Contact points for advice and support

The following members of staff have been identified as Safeguarding contacts:

- Designated Safeguarding Lead (DSL) – Waqas Yaqoob

All disclosures must be reported to the Designated Safeguarding Lead at waqas.yaqoob@kbmgroup.co.uk or contact KBM via telephone: 020 8992 4506

Safer Recruitment

We operate safer recruitment processes designed to recruit safely and fairly in line with the Disclosure and Barring Service (DBS) Code of Practice, the Rehabilitation of Offenders Act 1974, the Safeguarding Vulnerable Groups Act 2006, and the most recent statutory guidance in Keeping Children Safe in Education (KCSIE) 2025, which came into force on 1 September 2025.

For the full statutory guidance, see:

📄 Keeping Children Safe in Education (KCSIE) 2025 — UK Government statutory guidance for schools and colleges:

https://www.gov.uk/government/publications/keeping-children-safe-in-education--2

All interviews will include at least one colleague that is safer recruitment trained. All existing and newly recruited staff (including temporary and associate) who carry out regulated activity have DBS checks.

A weekly review of DBS records is undertaken by HR/DSL to ensure checks are valid and in date. If awaiting DBS confirmation for a new member of staff, they will be withheld from all learner-facing activity or, will receive 100% supervision of learner-facing activity until the DBS is in place.

During the probation period all staff will have a mitigation risk assessment in place dealing down additional monitoring and checks that ensure we mitigate any risk to learners/participants. This is in place for whole duration of probation.

Training

Staff complete a comprehensive induction and mandatory training when they join the business.

- Safeguarding Children, Young People and Vulnerable Adults
- Prevent
- Modern Slavery and Human Trafficking
- Fundamental British Values
- Lone Working
- Cyber Security
- Driver Safety Awareness
- Fire Safety Awareness
- General Data Protection Regulation
- Manual Handling
- Protecting Against Bribery and Corruption in the Workplace
- Understand Organisational Cultures, Equality, Diversion, and Inclusion.

We provide regular information and CPD activities to staff within our quality update to ensure staff are kept up to date and given the confidence to address and respond to issues. All staff undertake formal refresher training annually.

We provide all learners/participants with opportunities to explore safeguarding in a safe environment and in a way that is relevant to their learning programme with the aim of improving their knowledge, confidence, and awareness of safeguarding. Each month we send a learner newsletter to all live learners/participants which provides information to extend their learning on many key areas including safeguarding, Prevent and British Values.

Support

KBM is committed to providing timely and effective support to all learners, customers and employees to achieve and maintain a safe and secure environment for all. To support this, staff receive training to support the 5 R's model. Details of useful contacts and support agencies such the local Safeguarding Board; Local Children's' Services, Local Adult Services; Local Police Station and other specialist agencies are also available locally and centrally.

This document reflects the following key pieces of legislation

- Keeping Children Safe in Education (KCSIE) 2025 – statutory guidance for schools and colleges in England, in force from 1 September 2025.
- Working Together to Safeguard Children (2018, updated 2023) – statutory guidance for inter-agency working to safeguard and promote the welfare of children.
- Safeguarding Vulnerable Groups Act 2006 – framework for regulated activity and barring.

- Education Act 2002 – sets out duties of schools and education providers regarding welfare, curriculum, and standards.
- Children Act 2004 – establishes the framework for children's services and inter-agency safeguarding arrangements.
- ● Education and Training (Welfare of Children) Act 2021 – extends safeguarding duties to certain training providers.
- ● Information Sharing: Advice for Practitioners (2018) – non-statutory guidance supporting effective and lawful sharing of information in safeguarding contexts.

Monitoring and review

This policy will be monitored annually to review its effectiveness and will be updated in accordance with necessary changes.

Agreed/signed by: Salman Khan, CEO/Director

Annex-1

Safeguarding Children and Vulnerable Adults Disclosure/Concern Form

Learner's Name	
Address	
Date of Birth	
Programme Attended:	
BRIEF DETAILS OF THE ALLEGATIONS/DISCLOSURE/CONCERN *Use the learners/apprentices own words (factual information only. What happened? Who was involved? When did it happen? Where did it happen? How did it happen?)*	
Date & Place of Disclosure/Concern	
Member of Staff (name)	Date:
Member of Staff (signature)	Date:
Learner's Signature	Date: