Safeguarding Children and Young People Policy

Protecting children through safe, trusted and trauma-informed relationships

Organisation	Aptitude Trust
Charity number	1115264
Policy owner	Board of Trustees
Approved by	Board of Trustees
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> **If a child is in immediate danger, call 999.** To raise a safeguarding concern, email safeguarding@aptitudetrust.org.uk.

1. Our commitment to safeguarding

Aptitude Trust is committed to protecting the safety, welfare and rights of children and young people whose education has been interrupted by trauma, crisis or difficult life circumstances.

The Charity recognises that children who have experienced trauma may have particular safeguarding needs. Their previous experiences may affect their ability to trust adults, communicate concerns, establish relationships and feel safe in educational or supportive environments.

Our approach is relational and trauma-informed. We believe that safety comes first, followed by trust, and then the opportunity to reconnect with learning. Safeguarding is fundamental to this approach.

We recognise that a safe and trusted relationship can be an important part of a child's recovery and development. However, such relationships must always operate within clear professional boundaries, appropriate accountability and effective safeguarding arrangements.

We are committed to ensuring that every child who comes into contact with the Charity is treated with dignity, respect, compassion and fairness.

We will:

- Put the safety and welfare of children at the centre of our work.
- Listen to children and take their experiences, views and concerns seriously.
- Recognise the impact of trauma without allowing trauma-informed practice to obscure safeguarding concerns.
- Prevent abuse, neglect, exploitation and inappropriate behaviour.
- Ensure that employees, trustees, volunteers and representatives understand their safeguarding responsibilities.
- Maintain safe and appropriate professional relationships.
- Work collaboratively with parents, carers, schools, specialist providers and statutory agencies, where appropriate.
- Respond promptly and appropriately to safeguarding concerns.
- Ensure that our research and educational activities uphold children's rights, safety and privacy.
- Learn from incidents and continuously improve our safeguarding arrangements.

The Charity has no tolerance for abuse, exploitation, harassment, discrimination or behaviour that places a child at risk.

2. Purpose and scope

This policy sets out how Aptitude Trust will protect children and young people through its charitable activities.

It applies to all trustees, employees, volunteers, consultants, contractors and other individuals acting on behalf of the Charity.

It covers all activities undertaken or supported by the Charity, including:

- Helping children access specialist educational placements.
- Funding or facilitating relational, therapeutic and trauma-informed support.
- Supporting one-to-one and small-group interventions.
- Sharing the Charity's approach and experience with educators and other professionals.
- Commissioning, undertaking and supporting educational research.
- Communicating with children, parents, carers, schools and partner organisations.
- Fundraising, events, publicity and other activities undertaken in the Charity's name.

This policy applies whether activities take place in person, online, in educational settings, at specialist placements, in community environments or elsewhere.

The Charity recognises that some of its work may be delivered by independent specialist providers. In these circumstances, the Charity will establish clear safeguarding responsibilities and take reasonable steps to satisfy itself that appropriate safeguarding arrangements are in place.

3. Legal and regulatory framework

The Charity will comply with applicable safeguarding legislation and have regard to relevant statutory guidance in Wales. The principal framework includes:

- Social Services and Well-being (Wales) Act 2014, particularly Part 7.
- Children Act 1989.
- Children Act 2004.
- Safeguarding Vulnerable Groups Act 2006.
- Protection of Freedoms Act 2012.
- Equality Act 2010.
- Human Rights Act 1998.
- Data Protection Act 2018.
- UK General Data Protection Regulation.
- Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act 2015.
- Wales Safeguarding Procedures.
- Welsh Government guidance, Working Together to Safeguard People, particularly Volume 5.
- Charity Commission guidance on safeguarding and protecting people for charities and trustees.

Where the Charity works with children in England or funds placements in England, it will also have regard to the applicable English statutory safeguarding framework and local procedures.

The Charity will ensure that safeguarding arrangements are reviewed when relevant legislation, guidance or the geographical scope of its activities changes.

4. Responsibilities

4.1 Board of Trustees

The Board of Trustees has ultimate responsibility for safeguarding governance within Aptitude Trust. The trustees will:

- Approve and review this policy.
- Ensure that an appropriately trained Designated Safeguarding Lead (DSL) and deputy are appointed.
- Ensure that safeguarding arrangements are proportionate to the Charity's activities.
- Ensure that safeguarding risks are considered in strategic and operational decisions.
- Ensure that appropriate recruitment and DBS arrangements are in place.
- Monitor safeguarding incidents, concerns and learning.
- Ensure that sufficient resources are available for safeguarding.
- Ensure that relevant external organisations have appropriate safeguarding arrangements.
- Consider whether serious incidents must be reported to the Charity Commission.

- Ensure that safeguarding concerns involving senior personnel can be escalated independently.

The trustees will receive regular safeguarding updates, maintaining confidentiality where necessary. At least one trustee should have designated responsibility for oversight of safeguarding governance.

4.2 Designated Safeguarding Lead

The Charity will appoint a Designated Safeguarding Lead (DSL), who will be responsible for coordinating the Charity's safeguarding arrangements. Their responsibilities include:

- Receiving and responding to safeguarding concerns.
- Advising trustees, employees and volunteers.
- Ensuring that concerns are referred appropriately.
- Liaising with local authority children's services and police.
- Maintaining confidential safeguarding records.
- Monitoring safeguarding training.
- Supporting the development of safeguarding risk assessments.
- Reviewing arrangements with specialist providers.
- Ensuring that safeguarding concerns are followed up.
- Advising the Board of Trustees about significant risks and incidents.

The DSL must have appropriate safeguarding training and access to professional advice. The DSL is not responsible for investigating allegations of abuse or replacing statutory safeguarding authorities.

Current Designated Safeguarding Lead: Mrs Myra Hughes

4.3 Deputy Designated Safeguarding Lead

The Deputy DSL will support the DSL and act in their absence. If a concern involves the DSL, it must be reported directly to the Chair of Trustees or another designated independent trustee.

Current Deputy Designated Safeguarding Lead: Mrs Claire Skyme
Current Designated Independent Trustee: Mrs Teresa Penn

All three can be contacted at safeguarding@aptitudetrust.org.uk. If your concern is about the DSL, please mark your email for the attention of the Designated Independent Trustee.

4.4 Employees, volunteers and representatives

Everyone working on behalf of the Charity must:

- Understand and comply with this policy.
- Maintain professional boundaries.
- Treat children with dignity and respect.
- Be alert to signs of abuse, neglect or exploitation.
- Report safeguarding concerns immediately.

- Record concerns accurately.
- Maintain confidentiality appropriately.
- Attend relevant safeguarding training.
- Cooperate with safeguarding enquiries.

Safeguarding is a shared responsibility. No individual should assume that someone else has reported a concern.

5. Safer recruitment and suitability

Aptitude Trust recognises the importance of ensuring that anyone working with children is suitable for their role. The Charity will operate safer recruitment procedures proportionate to the nature of each position. These may include:

- Written role descriptions.
- Application and selection procedures.
- Interviews and suitability discussions.
- Verification of identity.
- References.
- Verification of relevant qualifications and experience.
- Appropriate safeguarding questions.
- DBS checks where legally eligible.
- Appropriate induction and ongoing supervision.

5.1 DBS checks

The Charity will obtain DBS checks where roles are legally eligible. Enhanced DBS checks and children's barred-list checks will only be requested where the relevant statutory eligibility criteria are met.

Where an individual undertakes regulated activity with children, the Charity will ensure that the applicable legal requirements are followed. DBS checks will form part of a wider safer recruitment process and will not be treated as a guarantee of suitability.

The Charity will consider its legal duty to refer an individual to the Disclosure and Barring Service where the relevant conditions are met.

5.2 Ongoing suitability

Safeguarding responsibilities do not end when recruitment is completed. The Charity will ensure that concerns about an individual's conduct, suitability or professional boundaries are addressed promptly.

6. Sharing knowledge and practice with educators

The Charity shares its trauma-informed approach with educators to improve understanding and support for children affected by trauma. This work must promote safe, respectful and appropriate practice. The Charity will ensure that:

- Training and guidance reinforce professional boundaries.
- Safeguarding remains an integral part of trauma-informed education.
- Case studies are anonymised wherever possible.
- Identifiable information about children is not shared without an appropriate lawful basis.
- Educators are encouraged to follow their own safeguarding policies and statutory responsibilities.
- Any safeguarding concern disclosed during training or professional discussions is appropriately escalated.

The Charity's educational work must not inadvertently encourage practices that compromise a child's safety or welfare.

7. Recognising and reporting safeguarding concerns

All concerns about the safety or welfare of a child must be taken seriously. Concerns may arise from:

- A direct disclosure.
- Observed injuries or behaviour.
- Information from parents or carers.
- Concerns raised by schools or placement providers.
- Online activity.
- A child's presentation or changing behaviour.
- Concerns about the conduct of an employee, volunteer or other professional.

A concern does not need to be proven before it is reported.

7.1 Responding to a disclosure

If a child tells someone about abuse or harm, the individual must:

- Listen carefully.
- Remain calm and supportive.
- Take the child seriously.
- Allow the child to communicate in their own way.
- Avoid leading questions.
- Never promise secrecy.
- Explain that information may need to be shared to keep them safe.
- Reassure the child that they have done the right thing by speaking out.
- Record the child's words accurately.

- Report the concern immediately to the DSL.

Children who have experienced trauma may find disclosure difficult. Staff must not pressure a child to provide more information than they wish to give.

7.2 Immediate danger

If a child is in immediate danger or requires urgent medical assistance, call **999**. The DSL must be informed as soon as possible.

7.3 Referral to statutory services

Where there is concern that a child is experiencing or is at risk of abuse, neglect or other harm, the Charity will make a prompt referral to the appropriate local authority children's social services safeguarding team. The police must also be contacted where a crime may have occurred or there is an immediate risk requiring police intervention.

The Charity will follow the Wales Safeguarding Procedures and the relevant local authority arrangements. A referral must not be delayed while attempting to obtain additional evidence, investigate the allegation or secure internal approval.

The Charity will not assume that a school, parent, placement provider or other organisation has made a referral. It must establish that appropriate action has been taken.

7.4 Recording concerns

Safeguarding records should include:

- The child's name and relevant details.
- The date, time and location of the concern.
- The nature of the concern.
- What was observed or disclosed.
- The child's own words, where possible.
- The identity of any alleged perpetrator, if known.
- Any immediate action taken.
- The individuals or agencies contacted.
- Any decisions or advice received.
- Further action required.

Records must distinguish between fact, observation and opinion.

8. Allegations against employees, volunteers, trustees or representatives

Any allegation that an individual working for or representing the Charity has harmed a child, may have harmed a child or may pose a risk to children must be treated seriously. This includes allegations concerning conduct outside the Charity's activities where that conduct may indicate a risk to children.

The Charity will:

- Take immediate steps to protect the child or any other person who may be at risk.
- Report the concern to the DSL or, where the allegation involves the DSL, to the Chair of Trustees.
- Refer the matter promptly to the relevant local authority Designated Officer for Safeguarding (DOS), or the equivalent officer identified by the relevant local authority.
- Contact the police where appropriate.
- Follow the Wales Safeguarding Procedures for allegations and concerns about people in positions of trust.
- Consider appropriate interim measures, including changes to duties or suspension where necessary.
- Cooperate fully with statutory investigations.
- Ensure that any internal employment or disciplinary process does not interfere with statutory enquiries.

The Charity will not undertake its own investigation before referring an allegation to the appropriate authority. It will maintain appropriate confidentiality while ensuring that the safety and welfare of children take priority.

The Charity will consider its DBS referral obligations where the relevant statutory criteria are met.

9. Online safety and digital communications

The Charity recognises that children may be exposed to online grooming, exploitation, harassment and inappropriate communications. Any digital communication undertaken in the Charity's name must be appropriate, transparent and professionally managed.

Employees and representatives must:

- Use approved communication channels.
- Avoid inappropriate private communications with children.
- Never request or exchange inappropriate images.
- Never share personal or confidential information inappropriately.
- Maintain professional boundaries on social media.
- Avoid using personal accounts to communicate privately with children.
- Report any suspected online abuse or exploitation.

Where online sessions or remote support are undertaken, appropriate arrangements must be established regarding parental awareness, supervision, platform security and the recording of sessions. Sessions must not be recorded without a clear lawful basis, appropriate consent and suitable safeguards.

10. Working with parents, carers and families

The Charity recognises that parents and carers can play an important role in helping children rebuild confidence and re-engage with education. Where appropriate, the Charity will work collaboratively with parents, carers and those holding parental responsibility.

However, the Charity recognises that a parent or carer may themselves be the source of a safeguarding concern. Where informing a parent or carer could increase risk to a child, compromise an investigation or otherwise be inappropriate, the Charity will seek advice from the relevant safeguarding authority before doing so.

The child's safety and welfare must remain the primary consideration.

11. Information sharing and confidentiality

Safeguarding information will be handled sensitively and in accordance with the Data Protection Act 2018 and UK GDPR. The Charity will ensure that:

- Information is shared only where there is a legitimate and lawful basis.
- Information is accurate, relevant and proportionate.
- Safeguarding records are securely maintained.
- Access is restricted to authorised individuals.
- Appropriate retention arrangements are in place.
- Information is shared promptly where necessary to protect a child.

Confidentiality must never be used as a reason to withhold information needed to protect a child from harm. The Charity will document significant information-sharing decisions, including decisions not to share information where this is relevant.

12. Whistleblowing and raising concerns

The Charity encourages anyone involved in its work to raise concerns about unsafe practices, inappropriate behaviour or failures to follow safeguarding procedures. Concerns may be raised with:

- The DSL.
- The Deputy DSL.
- The Chair of Trustees.
- Another independent trustee where the concern involves the Chair.

The Charity will take all genuine concerns seriously and will not tolerate retaliation against anyone who raises a safeguarding concern in good faith.

Where an individual believes that a concern has not been appropriately addressed, they should be able to contact the relevant local authority safeguarding service or police directly.

13. Monitoring, review and learning

The Board of Trustees will review this policy at least annually and whenever significant changes occur in the Charity's activities, safeguarding responsibilities or applicable legislation. The review will consider:

- Safeguarding incidents and concerns.
- Feedback from children, families and partner organisations.
- The effectiveness of placement safeguarding arrangements.
- Recruitment and training records.
- Research governance.
- Changes in statutory guidance.
- Lessons identified through safeguarding reviews or external enquiries.

The Charity will use learning to strengthen its practice and maintain a culture in which safeguarding is embedded in all its activities.

14. Policy approval

This policy was approved by the Board of Trustees of Aptitude Trust in November 2026. Next review date: November 2027.