

Policy Statement - Safeguarding Children and Vulnerable Adults



Purpose

BLCI is committed to safeguarding and promoting the welfare of children and adults who may be at risk of abuse or neglect. The welfare of students is paramount. All staff, contractors, homestay providers, volunteers and activity providers share responsibility for recognising concerns, reporting them promptly and maintaining professional boundaries.

This policy should be read alongside BLCI's staff code of conduct, safeguarding procedures, safer recruitment procedures, homestay procedures, health and safety arrangements, complaints/disciplinary procedures and relevant emergency procedures.

Key Statutory Guidance & Legislation

This policy is informed by the Children Act 1989 and 2004, Education Act 2002, Safeguarding Vulnerable Groups Act 2006, Equality Act 2010, Sexual Offences Act 2003, Care Act 2014, Data Protection Act 2018 and UK GDPR, and relevant current statutory guidance including Keeping Children Safe in Education 2026 and Working Together to Safeguard Children 2026.

BLCI will also have regard to relevant local safeguarding arrangements and guidance issued by the local authority and safeguarding partners.

Definitions

A child is a person under the age of 18. A person does not lose their entitlement to safeguarding because they are aged 16 or 17, live independently or are in further education.

For adults, BLCI will use the safeguarding principles in the Care Act 2014. An adult may require safeguarding support where they have care and support needs, are experiencing or at risk of abuse or neglect, and are unable to protect themselves because of those needs. BLCI will respond to concerns on a case-by-case basis and will not assume that a diagnosis, disability or other characteristic automatically means that a person is an adult at risk.

Safeguarding Principles Designated Safeguarding Lead

- Children and adults should be treated with dignity, respect and fairness.
- Safeguarding is everyone's responsibility.
- Concerns must be reported promptly and staff must not investigate allegations themselves.
- Concerns, allegations and disclosures will be taken seriously and dealt with appropriately.
- BLCI will promote an inclusive, anti-discriminatory culture and challenge racism, discrimination, bullying and harmful behaviour.
- Information will be shared lawfully and proportionately when this is necessary to safeguard a child or adult.
- Safeguarding records will be accurate, relevant, secure and retained in accordance with BLCI's data protection and retention arrangements.

Designated Safeguarding Lead Staff Responsibilities & Training

The Designated Safeguarding Lead (DSL) at BLCI is the Welfare Officer, Luke Kramer. The DSL can be contacted on 01273 647370 or luke@brightonlc.co.uk or approached directly in the main administration office.

If the DSL is unavailable, concerns must be reported to the Centre Director, Gary Charles Farmer, or to the appropriately trained safeguarding member of staff designated to provide cover. BLCI will ensure that suitable safeguarding cover is available during periods of operation, including high-season activity.

The DSL provides safeguarding leadership, advice and oversight, maintains safeguarding records, coordinates referrals where appropriate, and works with relevant external agencies and safeguarding partners.

Staff Responsibilities & Training

All staff must understand that safeguarding is part of their role. All staff must know how to recognise concerns, who to report them to and what to do if a student makes a disclosure.

BLCI will provide safeguarding induction and appropriate ongoing training. Staff must read the relevant current safeguarding information issued by BLCI, including the applicable requirements of Keeping Children Safe in Education 2026. Staff must also follow BLCI's local procedures and the DSL's instructions.

Reporting concerns & disclosures

A member of staff who has a concern about the safety or welfare of a child or adult, or who receives a disclosure, must report it to the DSL as soon as possible. If the concern involves the DSL, it must be reported to the Centre Director or another appropriate senior safeguarding lead.

Staff should listen calmly, take the concern seriously, avoid leading questions, avoid promising confidentiality, explain that information may need to be shared to keep someone safe, and record the facts as soon as possible. Staff must not investigate, confront an alleged perpetrator, or attempt to determine whether an allegation is true.

Where there is an immediate risk of serious harm or an emergency, the police or emergency services should be contacted without delay. The DSL will consider whether a referral to children's social care, adult social care, police or another appropriate agency is required.

Information sharing and data protection

BLCI will process personal data in accordance with the UK GDPR and Data Protection Act 2018. Safeguarding information will be shared lawfully, fairly and only with those who need the information for a legitimate safeguarding purpose. Data protection must not be used as a reason to withhold information where sharing is necessary to protect a child or adult from harm and a lawful basis for sharing applies.

Safeguarding records will be stored securely with access restricted to appropriate staff. Staff should record concerns objectively, distinguishing facts from opinion and identifying the source of information where appropriate.

Safer recruitment and DBS checks

BLCI will operate safer recruitment procedures appropriate to its roles and will undertake the checks required for the position. DBS eligibility will be assessed according to the duties actually undertaken and the current legal framework; this policy does not assume that every role is legally entitled to the same level of DBS check.

From 1 September 2026, the supervision exemption for regulated activity with children has been removed. BLCI will therefore review roles involving teaching, training, instructing, caring for or supervising children and will obtain the appropriate enhanced DBS and barred-list information where the legal criteria are met.

Where a DBS disclosure or other recruitment information raises a concern, BLCI will consider the nature, seriousness and relevance of the matter, the circumstances, the time elapsed and any other relevant information before making an employment decision. Decisions will be recorded appropriately and handled confidentially.

Staff and relevant homestay providers must notify BLCI of any subsequent matter that may affect their suitability to work with or accommodate under-18s, in accordance with their contractual or placement obligations.

Homestay and accommodation safeguarding

- BLCI will assess and vet homestay applicants before approval.
- All household members and regular visitors must be declared as required by BLCI's homestay procedures.
- DBS checks and other suitability checks will be completed where legally required and in accordance with BLCI's homestay risk assessment.
- Homestays hosting under-18 students will be monitored and reviewed according to BLCI procedures.
- Under-18 students will receive appropriate accommodation, welfare information, emergency contacts and curfew arrangements.
- Unsuitable accommodation will be removed from the approved homestay list.
- Parents/guardians will be provided with relevant information and consent arrangements for activities or circumstances requiring it.

Professional boundaries and conduct

- Staff must maintain professional relationships with students and must not seek inappropriate or secretive relationships.
- Personal phone numbers, personal email addresses and personal social-media accounts must not be used for communication with under-18 students except where an exceptional safeguarding or emergency circumstance requires it and the contact is reported appropriately.
- Where electronic communication with students is necessary, staff should use BLCI-approved professional channels.
- Staff must not arrange inappropriate private meetings with under-18 students or invite students to their homes.
- Staff must avoid unnecessary one-to-one situations and should, where practicable, remain within sight or hearing of other adults.
- Physical contact must be appropriate, necessary and proportionate.

- Staff must not take or share photographs, videos or other information about students except through approved BLCI processes and with the appropriate permissions.
- Any boundary concern, inappropriate communication or allegation involving a staff member must be reported.

Social programme and activities

Activities involving under-18 students must be planned and delivered in accordance with safeguarding and health and safety requirements. Appropriate staffing, supervision, risk assessment, emergency arrangements and student welfare measures must be considered. Activity leaders must know how to contact BLCI's emergency and safeguarding contacts.

External providers who have contact with under-18 students will be assessed and managed in accordance with BLCI's supplier and safeguarding procedures, including DBS requirements where applicable.

Allegations and concerns about staff

Any allegation or concern that a member of staff, volunteer, contractor, homestay provider or other person working with students has harmed a child, may pose a risk of harm, or has behaved inappropriately must be reported immediately to the Centre Director and DSL, unless the concern is about one of them, in which case it must be escalated to the appropriate alternative senior person or external safeguarding authority.

BLCI will follow the applicable local authority allegations-management arrangements and current statutory guidance. The organisation will not conduct an informal investigation that could prejudice an appropriate safeguarding or police process.

Child-on-child abuse and harmful behaviour

BLCI recognises that children can abuse other children. Concerns may include bullying, sexual harassment, sexual violence, coercive or controlling behaviour, discriminatory abuse, physical abuse, online abuse and exploitation. Such concerns will be taken seriously, reported to the DSL and managed in accordance with current safeguarding guidance and the needs of all students involved.

Online safety

BLCI recognises that safeguarding risks can arise online as well as in person. Staff should remain alert to online abuse, grooming, exploitation, sexual harassment, harmful content, bullying and other online harms. Concerns must be reported to the DSL and managed under BLCI's safeguarding and acceptable-use arrangements.

Adult safeguarding

Where there are concerns that an adult may be experiencing abuse or neglect, staff must report the concern to the DSL. The DSL will consider the person's wishes, immediate safety, capacity where relevant, the nature of the concern and whether referral to adult social care, police, health services or another agency is appropriate.

Confidentiality, whistleblowing and speaking up

Staff must never promise a child or adult that information will be kept secret. Information will be handled sensitively and shared only as necessary for safeguarding. Staff who believe a safeguarding concern is not being dealt with appropriately must raise the matter through BLCI's safeguarding, complaints or whistleblowing arrangements and, where appropriate, with an external safeguarding authority.

Review and monitoring

The Centre Director has overall responsibility for the policy, with delegated safeguarding responsibility to the DSL and relevant management staff. The policy will be reviewed at least annually and sooner where legislation, statutory guidance, local safeguarding arrangements or BLCI procedures change.

Appendix A – Code of Good Practice for Staff, Students and Volunteers

- Treat all students with dignity and respect.
- Maintain professional boundaries and avoid favouritism, secrecy or over-familiarity.
- Where possible, avoid working alone with a child and remain within sight or hearing of another adult.
- Use approved communication systems and maintain professional language.
- Report safeguarding concerns, disclosures and boundary concerns promptly.
- Do not investigate allegations yourself.
- Do not use personal social-media accounts to communicate privately with under-18 students.
- Do not invite under-18 students to your home or arrange inappropriate private meetings.
- Do not engage in inappropriate physical contact, sexualised behaviour, jokes or comments.
- Do not photograph, record or publish student images or information except through approved BLCI procedures.
- Challenge inappropriate behaviour and report it rather than ignoring it.

Appendix B – Code of Behaviour for Young People and Vulnerable Adults

Students and visitors are expected to respect other students, staff, accommodation providers and BLCI premises. Behaviour that places others at risk or involves violence, harassment, discrimination, sexual misconduct, bullying, possession or use of prohibited substances, or serious damage to property may result in removal from an activity or other appropriate action.

Students must follow BLCI's safety, emergency, attendance, curfew and accommodation rules. Concerns about their own safety or the safety of another student should be reported to a member of staff or the Welfare Officer.

Appendix C – Recognising Abuse and Safeguarding Concerns

Safeguarding concerns may involve physical abuse, sexual abuse, emotional or psychological abuse, neglect, financial or material abuse, discriminatory abuse, domestic abuse, exploitation, bullying, online abuse, coercive or controlling behaviour, sexual harassment or other behaviour that places a child or adult at risk.

Staff should consider changes in behaviour, injuries, fearfulness, withdrawal, inappropriate gifts or money, inappropriate sexualised behaviour, concerning online activity, unexplained absences, disclosures, or any other information that causes concern. There may be no visible sign of abuse. Staff do not need proof before reporting a concern.

LK/GF