

Safeguarding Policy

Worried about a child or an adult? Act now

Who	Contact
Immediate danger	Ring 999 first. Then tell the Designated Safeguarding Lead.
Our Designated Safeguarding Lead	Katie Smith, Office & School Transport Manager. Head Office 0161 480 0617
Deputy Designated Safeguarding Lead	Sam Nickson, Director. Head Office 0161 480 0617
Stockport Children's Services	0161 217 6028 , option 1
Cheshire East Children's Services (ChECS)	0300 123 5012 , option 3. Out of hours: 0300 123 5022
Stockport Adult Social Care	0161 217 6029 , Monday to Friday 8am to 8pm. Out of hours: 0161 718 2118
Cheshire East Adult Social Care	0300 123 5010 . Out of hours: 0300 123 5022
Concern about how we handle safeguarding	NSPCC whistleblowing advice line 0800 028 0285 (help@nspcc.org.uk)

1. Introduction and scope

Elite Services Limited, Elite Services Home to School Transport Limited, Elite Services Driver Training Limited, Carsville Coaches Limited and Freedom Travel North Limited trading as Smiths of Marple make a positive contribution to a strong and safe community. We recognise the right of every individual to stay safe.

Our staff come into contact with children and adults at risk through Home to School Transport, day trips and holidays, coach hire and private hire for the public, organisations and schools, and driver and minibus training. Contact with children and adults at risk is regulated and controlled at all times.

This policy sets out how we protect children and adults at risk and how we respond to concerns. It gives staff, paid and unpaid, a framework for good practice and makes clear what we expect of them. It applies to all employees, drivers, escorts, office and garage staff, directors, volunteers and sub-contracted drivers working on our behalf.

2. Who is responsible

Role	Responsibility
All staff	Follow this policy and related policies. Pass on every welfare concern straight away, using the steps in section 9. Be a good role model and help build safe working practice.
Directors	Make sure the policy is in place, effective and properly resourced, monitored and reviewed; that it is accessible to all staff; that staff have training; and that concerns are received and acted on seriously, swiftly and appropriately. Keep up to date with local safeguarding and DBS arrangements and keep working links with the relevant agencies.
Designated Safeguarding Lead (DSL)	Katie Smith, Office & School Transport Manager. Receives every concern, decides next steps, makes referrals, keeps the records and keeps this policy and staff training up to date.
Deputy DSL	Sam Nickson, Director. Acts when the DSL is unavailable, or when a concern is about the DSL.

3. Law and guidance this policy follows

Law or guidance	What it means for us
Keeping Children Safe in Education (KCSIE) 2026, in force from 1 September 2026	Statutory guidance for schools. The schools we serve follow it, so we work to it. The 2026 edition no longer has a short Annex A for non-teaching staff: everyone reads Part One.
Working Together to Safeguard Children (2023)	How agencies work together, including referrals and the role of the Local Authority Designated Officer (LADO).
Children Acts 1989 and 2004	Duty to promote welfare and cooperate with children's services.
Care Act 2014	Adult safeguarding: an adult at risk has care and support needs, is experiencing or at risk of abuse or neglect, and cannot protect themselves because of those needs.

Law or guidance	What it means for us
Safeguarding Vulnerable Groups Act 2006 and Protection of Freedoms Act 2012	Regulated activity, barred lists, and the duty to refer a person to the Disclosure and Barring Service (DBS) in certain cases.
Police Act 1997 and Rehabilitation of Offenders Act 1974	DBS checks and how spent and unspent convictions are treated.
Mental Capacity Act 2005 and Equality Act 2010	Respecting capacity and not discriminating against disabled passengers.
Counter-Terrorism and Security Act 2015	The Prevent Duty: noticing and reporting concerns about radicalisation.
Public Interest Disclosure Act 1998	Protection for staff who report wrongdoing in good faith.
UK GDPR and Data Protection Act 2018	Safeguarding information can be shared to protect a child or adult at risk; the law is not a barrier.

4. What we mean

Safeguarding is about building protection into everything we do so that children and adults at risk are safe. **Child and adult protection** is about responding when something has happened or is at risk of happening.

A child is anyone under 18. **An adult at risk** is a person aged 18 or over who has care and support needs and, because of those needs, cannot protect themselves from abuse, neglect or exploitation. This may include people who are elderly and frail, have dementia or mental ill health, have a physical, sensory or learning disability, have a severe illness, misuse substances or are homeless.

Abuse is the misuse of power or trust over another person. It can be caused by those who inflict harm or by those who fail to act to prevent it, and it is not restricted to any social group, gender or culture. It includes:

- Physical abuse
- Sexual abuse, including grooming and online sexual abuse
- Emotional or psychological abuse and bullying, including cyberbullying
- Neglect and self-neglect
- Financial or material abuse
- Child-on-child abuse (children harming other children, in person or online)
- Child sexual and criminal exploitation, including county lines and serious violence
- Radicalisation and extremism
- Domestic abuse, modern slavery and discriminatory abuse

5. Keeping people safe: safe recruitment

We recruit safely. Every role says clearly whether it involves contact with children or adults at risk, and what is expected. We use formal applications and shortlisting, interview on the job description and person specification, take up references, and follow Equal Opportunities, Data Protection and Confidentiality policies.

- Everyone working with children or adults at risk, including every school service driver and escort, has an **enhanced DBS check** (with a barred list check where the role is regulated activity). We do not accept a certificate carried over from another employer.
- No formal job offer is made, and nobody starts work, until the checks for suitability, including DBS checks and references, are complete.
- We keep a list of every role that involves contact with children or adults at risk so that no DBS check lapses. Those checks are repeated on a **3 year rolling programme**, and anybody who moves into one of those roles from another is checked first.
- Sub-contracted drivers and operators who carry our passengers must have the same checks, and we check their safeguarding arrangements. Our contracts and agreements set out the minimum safeguarding standards and what happens if they are not met.
- A DBS certificate is not kept longer than the DBS recommends. We keep a record of the date, level and outcome of each check.

6. Induction, training and support

Every new member of staff is given this policy, discusses it at induction and signs to say they have read and understood it (form on the last page). Induction covers the reporting steps, the role of their line manager and the DSL, safe working practice, safe recruitment and how to spot abuse. Their line manager and a Director assess their competence during their probationary period.

Everyone whose role brings them into contact with children or adults at risk has safeguarding training suited to their role, which for drivers and escorts includes the NSPCC Transport Driver Training, and is refreshed regularly. Everyone reads Part One of KCSIE 2026, and the DSL and Deputy have training at the level KCSIE sets out. Safeguarding is a standing item at team and one-to-one meetings, and managers remind staff of the procedures through regular briefings.

Safeguarding situations can be stressful. After a concern, the DSL or a manager contacts the member of staff within 48 hours, offers a debrief and arranges more support, such as counselling, where it is needed.

7. Professional boundaries and conduct

Staff must protect the professional integrity of themselves and the organisation. In particular:

- Do not give gifts to, or accept gifts from, passengers or their families without a Director's permission, and declare any gift that is given.

- Personal relationships with a passenger who is a current service user are prohibited. This includes contact through social media and messaging apps.
- Do not pass on or ask for a child's personal contact details, or give out your own. Do not use your own phone to contact a child.
- Do not photograph or film a child, or share an image of one, other than through our own systems (such as vehicle CCTV, see the CCTV Notice).
- Do not use abusive language, punishment or chastisement. Respond to poor behaviour in line with the Consequences & Exclusion Policy.
- Do not borrow from or lend money to passengers, sell to or buy from them, or take responsibility for their valuables.
- Avoid being alone with one child where you can. If you cannot, keep to the route, keep the vehicle and the child in view and tell the office.
- Follow the Code of Conduct, computer misuse, e-safety and confidentiality rules.

Breaking these boundaries can lead to disciplinary action or the allegations procedure in section 10.

8. Passengers who need extra care

Children and adults with medical conditions, disabilities or additional needs are carried safely and with dignity.

For **Home to School**, medical and additional needs are recorded when the child is registered and passed to the driver for that run.

For **other travel**, office staff ask about assistance needs when booking and drivers check with group leaders before departure. See our Medical Emergency On Board Guidance and Coach Travel Risk Assessment.

On **private hire**, the group leader or school is responsible for supervising the group, and the school's own risk assessment applies.

9. If you have a concern: what to do

If someone is in immediate danger, ring 999 first. Then follow these steps:

- Tell the DSL (or deputy) **straight away**, and no later than the end of the same working day. If they are not available, tell a Director. Do not wait to see whether somebody else will report it.
- Make sure the person is safe and get medical attention if they need it.
- If a child or adult tells you something: listen, stay calm, reassure them they are being taken seriously and are not to blame, and do not ask leading questions. **Never promise to keep a secret.** Explain you may have to tell somebody who can help.
- Write down what you saw or heard as fact, in the person's own words, with the date, time and place, without opinion. Sign and date it and give it to the DSL. Do not investigate yourself.

- The DSL decides what happens next. Where a child may be at risk of harm, the DSL refers to children's services at the council where the child lives or the school is, using the numbers on page 1, and rings 999 if it is an emergency. A written referral follows within 24 hours. For an adult at risk, the DSL refers to adult social care.
- The DSL discusses the concern with parents or carers where it is safe and appropriate, and does not do so where it could put the child at greater risk.
- The DSL records every decision and what was done, follows up until there is a response from the local authority and records it, and tells the member of staff what they can.

If the concern is about the DSL, tell the Deputy DSL or a Director. If the concern is not being dealt with, you can ring the NSPCC whistleblowing advice line on 0800 028 0285.

10. Allegations about a member of staff

We recognise our duty to report concerns or allegations about any member of staff, paid or unpaid, including sub-contracted drivers, whether they come from within the company or from another professional.

- **Step 1.** Anyone with a concern or allegation tells the DSL straight away (or the Deputy DSL or a Director if it is about the DSL). A written record is made by a Director. Nobody investigates it alone.
- **Step 2.** The DSL or a Director contacts the local authority designated officer (LADO) through the relevant council's children's services number on page 1, without delay and no later than one working day, for advice.
- **Step 3.** We follow the advice given. We consider whether the person should be moved from contact with children or suspended while it is looked into, and keep the school informed where it is involved.
- If a person is removed from, or leaves, work with children or adults at risk because of harm or the risk of harm, we have a legal duty to refer them to the **Disclosure and Barring Service (DBS)**. The DBS took over from the Independent Safeguarding Authority (ISA) in 2012.

11. Behaviour between children on our services

Children can abuse other children, at any age, in person and online. On school services this includes bullying, physical abuse, sexual harassment and violence, and sharing nudes or semi-nudes. Drivers log incidents with the Transport Manager within 24 hours, following the Consequences & Exclusion Policy. Anything that may be abuse or harassment goes to the DSL straight away as a safeguarding concern and not only as a behaviour matter. Children who report are taken seriously and never made to feel they are creating a problem. The school is informed where its pupil is involved.

12. Online safety, images and recordings

Technology is part of many safeguarding concerns, and risks online include content, contact, conduct and commerce, and now include material made with artificial intelligence. Staff must not use their own devices to take, store or share images of passengers. We use CCTV and vehicle tracking only for the reasons in our CCTV Notice. The Home to School app is for parents and carers only and children do not have accounts.

13. Extremism and exploitation

Staff who notice signs that a child or adult may be being radicalised or exploited (for example by criminal gangs, county lines or trafficking) tell the DSL straight away. The DSL decides whether to refer to children's or adult services, the Prevent programme or the police.

14. Information, records and confidentiality

Safeguarding records are made and kept in line with our Confidentiality Policy, Data Protection Policy and Data Retention Policy & Schedule. Staff have a professional duty to share information with other agencies to safeguard children and adults at risk, and the public interest in safeguarding can override confidentiality. Information is shared on a need-to-know basis, as judged by the DSL, and staff must not promise service users or their families that they will keep secrets. Records are locked away or secured electronically. Incident logs about a member of staff are kept until they retire or for 10 years from the date of the allegation, whichever is longer. Standard incident logs are kept for one year after the Home to School service ends, and records of sexual abuse until the child's 75th birthday.

15. Resolving disagreements

If staff or partner agencies disagree about how a child or adult at risk should be protected, the disagreement is taken to the DSL and a Director, who use the local authority escalation and professional disagreement procedure. The child's safety comes first while it is settled.

16. Monitoring and review

The Directors monitor safe recruitment, DBS checks and references, supervision and training records, whether concerns are being reported and acted on, and whether this policy and our reporting procedure are up to date. This policy is reviewed by Sam Nickson, Director, at least every year and whenever the law or guidance changes, such as a new edition of KCSIE. It is available on request and on our website at www.eliteservicesltd.com.

Version	Date	What changed
Previous	Not dated	Based on KCSIE 2023 and Working Together 2010.
This version	7 October 2026	Updated for KCSIE 2026 and Working Together 2023. Home to School Transport Ltd and Driver Training Ltd added. Contact numbers added. Allegations, online

Version	Date	What changed
		safety, child-on-child abuse and Prevent sections added.

Part One of KCSIE: what everyone should know

Everyone who comes into contact with children has a role in keeping them safe. Our DSL gives every member of staff a copy of Part One of Keeping Children Safe in Education at induction and whenever it changes. In short:

- Safeguarding children is everyone's responsibility. A child is anyone under 18.
- Know who the DSL is and how to reach them. If unsure, speak to the DSL.
- Know the signs of physical, emotional and sexual abuse and neglect, and of exploitation. Abuse can take place wholly online, or technology can be used to facilitate offline abuse.
- Mental health problems can be a sign that a child has suffered or is at risk of abuse, neglect or exploitation.
- Act on concerns immediately. Do not assume a colleague or another professional will do it.
- Never promise a child you will keep what they tell you secret. Reassure them they are being taken seriously.
- Children can abuse other children. Treat bullying, sexual harassment and violence as safeguarding.
- Concerns about a member of staff go to the DSL, or to a Director if they concern the DSL. If you are not satisfied, use the NSPCC whistleblowing line, 0800 028 0285.

Confirmation of reading

I confirm that I have been made aware of, and understand, the Safeguarding Policy of the Elite Services group and that I have been given Part One of Keeping Children Safe in Education. Please sign and return this form to Katie Smith, Designated Safeguarding Lead.

Employee name

Employee signature

Date

Policy Last Updated: 07th October 2026

Next Review Date: 07th October 2027