



LINK EDUCATION LTD

P001 – SAFEGUARDING & CHILD PROTECTION POLICY

VERSION 1.2 | AUGUST 2026 | CONTROLLED DOCUMENT

1 POLICY STATEMENT

Link Education Ltd is committed to safeguarding and promoting the welfare of children and expects every employee, consultant, candidate, agency worker and contractor to share this commitment. Safeguarding is everyone's responsibility. The welfare and best interests of the child are paramount, and concerns must be acted upon promptly even where information is incomplete or the person reporting is unsure whether a formal threshold has been met.

Link Education Ltd is an employment business and is not normally the child's education or childcare provider. We work alongside schools, colleges, nurseries, early-years settings, local authorities and safeguarding partners. This policy explains the responsibilities of Link Education Ltd and the people it supplies, including how concerns, allegations, low-level concerns and Prevent-related risks must be received, recorded, reported and escalated.

2 PURPOSE AND SCOPE

This policy applies to:

- all Link Education Ltd employees, directors, recruitment consultants, compliance and payroll personnel;
- all candidates, agency workers, temporary workers and contractors registered with or supplied by Link Education Ltd;
- temporary, long-term, permanent and introduction-only recruitment activity; and
- concerns arising during recruitment, vetting, an assignment, outside work or after an engagement has ended.

The policy covers:

- concerns that a child is suffering or is likely to suffer harm;
- a child's disclosure or information received from a parent, client, worker or third party;
- allegations against agency workers or other adults working with children;
- low-level concerns and patterns of concerning behaviour;
- professional conduct concerns with a potential safeguarding element;
- radicalisation and Prevent-related concerns;
- historical or non-recent allegations;
- concerns identified during recruitment, vetting or continued-suitability checks; and
- failure by an organisation or individual to respond appropriately to a safeguarding concern.

3 LEGAL AND STATUTORY FRAMEWORK

This policy is informed by the current versions of:

- Keeping Children Safe in Education 2025, which remains in force until 31 August 2026, and Keeping Children Safe in Education 2026, which applies from 1 September 2026;
- Working Together to Safeguard Children 2026;
- the statutory framework for the Early Years Foundation Stage (EYFS) in force at the relevant time, including the revised framework effective from 1 September 2026;
- the Children Acts 1989 and 2004;
- the Education Act 2002;
- the Safeguarding Vulnerable Groups Act 2006 and Protection of Freedoms Act 2012;
- the Counter-Terrorism and Security Act 2015 and Prevent Duty Guidance;
- the Data Protection Act 2018 and UK GDPR;
- the Human Rights Act 1998 and Equality Act 2010;
- the Conduct of Employment Agencies and Employment Businesses Regulations 2003; and
- relevant local safeguarding partnership, LADO, DBS and professional-regulator procedures.

Where statutory guidance, legislation or a local safeguarding procedure changes, the current requirement takes precedence and this policy will be updated as soon as reasonably practicable.

4 ROLES AND RESPONSIBILITIES

4.1 DESIGNATED SAFEGUARDING LEAD

Link Education Ltd's Designated Safeguarding Lead (DSL) is Paula Lazarus, Chief Operating Officer. The DSL is responsible for:

- receiving and assessing safeguarding information;
- ensuring immediate protective action and appropriate escalation;
- liaising with clients, LADOs, children's social care, police, DBS, TRA/EWC and other relevant bodies;
- overseeing safeguarding records, decisions and referrals;
- identifying patterns, themes and organisational learning; and
- supporting staff, agency workers and those affected by safeguarding matters.

4.2 DEPUTY DESIGNATED SAFEGUARDING LEAD

The Deputy DSL is Jamie Gray, Managing Director. The Deputy DSL acts when the DSL is unavailable or where the concern relates to the DSL. If a concern relates to both the DSL and Deputy DSL, or the reporter reasonably believes the internal route is compromised, the matter must be raised directly with the relevant client safeguarding lead, LADO, children's social care, police or another appropriate authority and may also be raised under the Whistleblowing Policy.

4.3 CONSULTANTS AND INTERNAL STAFF

Consultants and internal staff must:

- recognise and report concerns immediately;
- remain calm, listen and obtain only the information required to understand the immediate risk;
- make an accurate, contemporaneous record using the person's own words wherever possible;
- not investigate, interview witnesses, seek proof or decide whether an allegation is true;
- not promise secrecy or discuss the matter with colleagues who do not need to know;
- preserve relevant emails, messages, notes and documents; and
- escalate again if they believe appropriate action has not been taken.

4.4 AGENCY WORKERS

Agency workers must comply with the safeguarding arrangements of every setting in which they work, attend the setting's induction, identify the setting's DSL or safeguarding contact and report concerns to the setting without delay. They must also notify Link Education Ltd as soon as reasonably practicable so that Link can provide support, maintain its records and take any action required as the employment business. Immediate reporting to the setting must not be delayed while attempting to contact Link Education Ltd.

5 RECOGNISING SAFEGUARDING CONCERNS

Safeguarding concerns may relate to physical abuse, emotional abuse, sexual abuse, neglect or other forms of harm. Staff and agency workers must remain alert to indicators including changes in behaviour, unexplained injuries, fear, hunger, poor hygiene, sexualised behaviour, concerning online activity, repeated absence, exploitation or information disclosed by the child or another person.

Safeguarding also includes, but is not limited to:

- child-on-child abuse, sexual violence and sexual harassment;
- domestic abuse and the impact of abuse within the home;
- criminal exploitation, county lines, serious violence and gang involvement;
- child sexual exploitation and trafficking;
- online abuse, grooming, harmful content and image sharing;
- female genital mutilation, forced marriage and honour-based abuse;
- radicalisation and susceptibility to extremist influence;

- mental-health concerns linked to harm or risk;
- fabricated or induced illness;
- homelessness, private fostering and other circumstances increasing vulnerability; and
- concerns about an adult's conduct, professional boundaries or suitability to work with children.

The absence of a disclosure does not mean there is no concern. Children may communicate through behaviour, may not recognise what is happening as abuse, may fear consequences or may face barriers related to age, communication, disability, language, culture or dependency.

6 IMMEDIATE DANGER OR URGENT RISK

Where a child or another person is in immediate danger, requires urgent medical assistance or a serious crime is in progress:

1. Call 999 or ensure that the setting does so immediately.
2. Notify the setting's DSL, headteacher, manager or other safeguarding contact without delay.
3. Notify Link Education Ltd's DSL or Deputy DSL as soon as it is safe and practicable.
4. Record the facts, actions, times, people contacted and advice received.
5. Do not place yourself or others at additional risk and do not investigate.

If the child is not in immediate danger but may be at risk of harm, the concern must still be reported to the setting and Link Education Ltd immediately. No one should assume that somebody else has already reported it.

7 RESPONDING TO A DISCLOSURE OR REPORT

When a child or adult shares safeguarding information, the recipient should:

- listen carefully and take the person seriously;
- remain calm and avoid expressing shock, disbelief or judgement;
- reassure the person that they have done the right thing by speaking;
- explain that the information must be shared with people who can help;
- allow the person to speak freely and avoid leading, suggestive or repeated questions;
- ask only limited open questions needed to clarify what is being said or establish immediate safety;
- not ask the person to repeat the account unnecessarily;
- not confront the person alleged to be responsible;
- not take photographs or examine injuries unless this forms part of an authorised professional role; and
- make a written record as soon as possible, using the person's exact words where practicable.

8 REPORTING AND ESCALATION ROUTES

8.1 CONCERN ABOUT A CHILD

An agency worker must report the concern immediately to the setting's DSL or safeguarding lead and must also notify Link Education Ltd. A Link consultant receiving the concern must refer it immediately to Link's DSL or Deputy DSL and confirm what action the setting has taken.

8.2 CONCERN ABOUT AN EMPLOYEE OF A CLIENT SETTING

The concern must be reported to the setting's headteacher, manager, proprietor or designated person in accordance with its procedure, and to Link's DSL. If the concern relates to the headteacher or manager, it must be reported to the chair of governors, proprietor, nominated trust representative or LADO as appropriate. Link will support escalation where the worker believes the setting has not responded appropriately.

8.3 CONCERN ABOUT A LINK AGENCY WORKER, CANDIDATE OR EMPLOYEE

The recipient must notify Link's DSL or Deputy DSL immediately. Link will liaise with the client and relevant safeguarding authority, preserve the integrity of any investigation and consider necessary interim safeguards. The

worker must not be questioned in detail before advice is obtained where this could prejudice a statutory or criminal investigation.

8.4 NO RESPONSE OR INADEQUATE RESPONSE

Anyone who believes that a concern has not been acted upon must escalate it to the next appropriate safeguarding level. This may include Link's Deputy DSL, senior management, the client's safeguarding lead, LADO, local authority children's social care, police or the Whistleblowing Policy. Professional disagreement must never result in inaction where a child may remain at risk.

9 ALLEGATIONS AGAINST ADULTS AND THE HARM THRESHOLD

An allegation may meet the harm threshold where a person who works with children has:

- behaved in a way that has harmed a child or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children, including conduct outside work that presents a transferable risk.

Where the threshold may be met, Link's DSL will ensure prompt liaison with the client and consultation with the relevant LADO without delay and ordinarily within one working day. Police, children's social care and other agencies will be involved where required. Link will follow the agreed strategy and will not undertake an internal investigation that could prejudice external enquiries.

Necessary interim action may include ending or pausing the assignment, restricting duties or suspending offers of work while enquiries take place. Such action is neutral and protective; it is not a finding of guilt. Alternatives will be considered where they can manage risk safely.

At the conclusion of the relevant process, outcomes will be recorded using the applicable definitions, including substantiated, malicious, false, unsubstantiated or unfounded. Link will consider further internal action, continued suitability, DBS or professional-regulator referral and information that must lawfully be shared with future clients or employers.

10 LOW-LEVEL CONCERNS

A low-level concern is any concern, no matter how small and even if it amounts only to a sense of unease, that an adult working with children may have acted in a way that is inconsistent with the Code of Conduct, including inappropriate conduct outside work, but the behaviour does not appear to meet the harm threshold or is otherwise not serious enough to consider a LADO referral.

Examples may include an adult who:

- is over-friendly with children or seeks unnecessary one-to-one contact;
- has favourites, gives inappropriate gifts or communicates outside approved channels;
- uses humiliating, intimidating, sexualised, discriminatory or otherwise inappropriate language;
- takes, shares or retains images contrary to the setting's rules;
- uses inappropriate physical contact or handles behaviour in a manner inconsistent with policy;
- shares personal information or creates blurred professional boundaries;
- fails to follow safeguarding, supervision, reporting or social-media requirements; or
- behaves outside work in a way that raises concern about professional judgement or suitability.

All low-level concerns must be reported promptly to Link's DSL or Deputy DSL and, where they arise in a placement, through the client's reporting arrangements. The report must be recorded even where the individual is uncertain or believes the conduct may be innocent.

The DSL will review the information, determine whether the harm threshold may in fact be met, liaise with the client, seek appropriate clarification and decide proportionate action. Records will be reviewed for patterns involving the same worker, setting, child or type of behaviour. A series of apparently minor concerns may collectively indicate a more serious safeguarding or conduct risk.

11 PROFESSIONAL CONDUCT CONCERNS AND COMPLAINTS

A concern may ultimately be assessed as a professional conduct, performance or service issue rather than a safeguarding allegation. Safeguarding must nevertheless be considered first. The matter must not be routed solely through informal complaint handling until any safeguarding element has been assessed by the DSL.

Where the safeguarding threshold is not met, the concern may be managed under the Complaints Procedure, Code of Conduct, capability, disciplinary or continued-suitability processes. The rationale for the route selected must be recorded, and the matter must be re-escalated if new information changes the assessment.

12 PREVENT AND RADICALISATION CONCERNS

Prevent is part of safeguarding. Link Education Ltd supports education and early-years settings in identifying and responding to people who may be susceptible to radicalisation or drawn into terrorism. Concerns must be based on behaviour, information and context and must not be founded on religion, ethnicity, political opinion or another protected characteristic.

Possible indicators may include:

- significant changes in behaviour, peer groups, language or online activity;
- expressed support for terrorism or violence;
- accessing, sharing or promoting extremist material;
- intolerance, dehumanising language or fixation on grievance linked to harmful ideology;
- attempts to recruit, pressure or isolate others; and
- information suggesting travel, preparation or activity connected with terrorism.

A Prevent-related concern must be reported immediately to the setting's DSL and Link's DSL or Deputy DSL. The reporter must not attempt to assess ideology, challenge the person, search private devices or make an external referral independently. The DSL will liaise with the setting and relevant safeguarding or Prevent partners. Where there is an immediate threat, call 999.

13 HISTORICAL AND NON-RECENT CONCERNS

Historical allegations and non-recent concerns must be treated seriously and reported through the same safeguarding route. The passage of time, the person's current employment status or the fact that the alleged victim is now an adult does not remove the need to record, assess and refer the information where children may currently be at risk or an external authority should be notified.

14 RECORDING, CONFIDENTIALITY AND INFORMATION SHARING

Safeguarding records must include, so far as known:

- the date, time and method by which the concern was received;
- the identity and contact details of the reporter and people involved;
- the child's or reporter's exact words where possible;
- facts observed, clearly separated from opinion or third-party information;
- immediate safety issues and action taken;
- people and organisations contacted, advice received and decisions made;
- the rationale for escalation, referral or no further action; and
- follow-up actions, outcomes and review dates.

Records must be made as soon as possible, dated and attributable to the author. Original notes must be retained. FileMaker or another approved system may be used, but safeguarding information must be restricted to authorised personnel and stored separately from routine commercial notes where appropriate.

Safeguarding information will be shared lawfully, proportionately and on a need-to-know basis. Data protection law does not prevent information sharing where it is necessary to safeguard a child. Consent is not required where

seeking it would place someone at risk, prejudice an investigation or conflict with a legal safeguarding obligation. Decisions about sharing or not sharing information must be recorded.

Absolute confidentiality cannot be promised. The identity of an adult subject to an allegation and the details of the matter must be protected in accordance with legal reporting restrictions and safeguarding guidance. Staff must not discuss cases in open office areas, informal messaging groups or with clients, workers or colleagues who have no legitimate role in the matter.

15 SUPPORT, FAIRNESS AND PROTECTION FROM RETALIATION

Children, reporters, witnesses and adults who are the subject of concerns will be treated with respect and supported appropriately. Link Education Ltd will act impartially and avoid prejudging outcomes while maintaining the child's welfare as the primary consideration.

No person will suffer retaliation for raising a genuine concern in good faith. A report that is not substantiated is not automatically false or malicious. Action for a deliberately false or malicious report will only be considered where there is evidence that the person knowingly fabricated the allegation, and never merely because the concern could not be proven.

16 EXTERNAL REFERRALS AND REGULATORY ACTION

Depending on the facts and applicable duties, Link Education Ltd may refer or provide information to:

- the Local Authority Designated Officer (LADO);
- local authority children's social care or safeguarding partners;
- the police;
- the Disclosure and Barring Service (DBS);
- the Teaching Regulation Agency (TRA) or Education Workforce Council (EWC);
- the relevant Prevent or Channel arrangements; and
- another regulator, professional body, employer or client where lawful and necessary.

The DSL will ensure that legal referral duties are considered when Link removes a person from regulated activity, would have removed them had they not left, or receives information that the harm test or relevant-conduct criteria may be met. Resignation, withdrawal from registration or the end of an assignment will not prevent completion of safeguarding enquiries or required referrals.

17 TRAINING, AWARENESS AND ASSURANCE

Link Education Ltd will ensure that:

- relevant staff receive safeguarding induction and regular updates appropriate to their role;
- consultants understand disclosures, immediate danger, allegations, low-level concerns, Prevent and escalation routes;
- agency workers receive safeguarding expectations and current KCSIE reading requirements before supply;
- understanding is evidenced through acknowledgements, scenario-based assessment or competency review;
- records and concerns are audited for quality, delay, patterns and learning; and
- this policy is reviewed after significant cases, guidance changes or identified control failures.

18 KEY CONTACTS AND QUICK REPORTING ROUTE

Situation	Immediate action	Escalation
Immediate danger or serious crime	Call 999; protect life and safety	Setting DSL and Link DSL/Deputy DSL
Concern or disclosure about a child	Report immediately to setting DSL	Notify Link DSL/Deputy DSL
Allegation against an agency worker	Do not investigate; preserve information	Link DSL and client; LADO consideration
Low-level concern	Record and report promptly	Link DSL and client safeguarding route
Prevent concern	Treat as safeguarding; do not assess alone	Setting DSL and Link DSL/Deputy DSL
Internal route compromised or no action	Escalate without delay	Deputy DSL, LADO, children's social care, police or whistleblowing route

Link Education Ltd safeguarding contacts:

- DSL: Paula Lazarus, Chief Operating Officer
- Deputy DSL: Jamie Gray, Managing Director
- Telephone: 01689 878 565
- Email: compliance@link-education.co.uk

19 RELATED CONTROLLED DOCUMENTS

Related documents are P002 – Recruitment, Selection and Vetting Policy; P005 – GDPR, Data Protection & Information Security Policy; P007 – Complaints Procedure; P013 – Whistleblowing Policy; P019 – Code of Conduct & Ethics; PR001 – Candidate Registration & Compliance Procedure; PR002 – Candidate Vetting Procedure; and the relevant safeguarding, allegation, risk-assessment and continued-suitability records and forms.

This policy incorporates the operational content previously held in P014 – Prevent Duty Statement and P015 – Low-Level Concerns Policy. Those documents may be archived once this policy is approved and issued.

20 MONITORING AND REVIEW

Implementation will be monitored through case review, safeguarding records, training evidence, complaints, corrective actions and audit. The policy will be reviewed annually and following statutory change, a serious incident or an identified weakness.

21 DOCUMENT CONTROL

Document title	Safeguarding & Child Protection Policy
Reference	P001
Version	1.2
Effective date	August 2026
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Policy owner	Chief Operating Officer / Designated Safeguarding Lead
Approved by	Managing Director
Review frequency	Annually or sooner following statutory, safeguarding or operational change
Status	Controlled document – active
Supersedes	P001 Version 1.1; incorporates P014 – Prevent Duty Statement and P015 – Low-Level Concerns Policy