

Safeguarding Children and Adults at Risk Policy Statement

The purpose of this policy statement is to:

- Protect Children and Adults at Risk from harm.
- To provide Colas employees with the overarching principles and process that guides our approach to safeguarding the wellbeing of children, and Adults at Risk.
- This policy will be communicated throughout the organisation including subsidiaries: Colas Isle of Man, Colas SIAC projects, Allied Infrastructure and Colas UK Projects Ltd and is readily available to interested parties on request and will be kept as documented information.

Introduction

Colas Ltd is a Civil Engineering contractor delivering sustainable solutions for the UK's transport infrastructure. We invest, design, manufacture, construct, maintain, and operate a wide variety of projects for public and private sector clients. We're part of the International Colas Group.

We are committed to safeguarding the welfare of children, and adults at risk we come in to contact with, our involvement with these groups is listed below:

Employment: We employ people under the age of 18, and adults who may be defined as at risk.

Work experience: We offer work experience placements to children under the age of 16 in our offices, and aged 16-18' in a variety of settings. We may also offer placements to adults considered to be at risk.

School/College engagement: We deliver careers events for providers of education and personal development for children, and Adults at Risk via schools, colleges, universities, charities, and other providers. This is delivered both at their premises and our places of work for example site visits.

A named person(s) for safeguarding

Name of Designated Safeguarding Lead (DSL): Executive Director of HR

Name of Deputy Safeguarding lead: Head of HR

Telephone number: +44 (0) 1342 711011

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Defining who this policy applies to

Children are defined in the Safeguarding Act 2018 as anybody under the age of 18. Note that this policy relates to safeguarding, and that separate Health and Safety guidance can be found via the HSE website under guidance/topics/young people at work.

Adults at Risk replaces the term 'Vulnerable Adults'. Safeguarding duties apply to an adult who:

- has needs for care and support (whether or not the local authority is meeting any of those needs) and;
- is experiencing, or is at risk of, abuse or neglect; and;
- as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of, abuse or neglect.

NB - Looked After Children (LAC) and Care Experienced young people up to the age of 25 (known generally as Care Leavers) are included in this definition. LAC/Care Experienced people are those residing/previously residing in foster or other social care setting and/or under the care of local authority social services.

Recognising the signs and symptoms of abuse

Physical Abuse: May involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child/Adult at Risk (AaR)

Emotional Abuse: Is the persistent emotional maltreatment of a child/AaR. It may include not giving the child/AaR opportunities to express their views, deliberately silencing them or “making fun” of what they say or how they communicate. Some level of emotional abuse is involved in all types of maltreatment, though it may occur alone.

Sexual Abuse: Involves forcing or enticing a child/AaR to take part in sexual activities, not necessarily involving a high level of violence, whether or not the victim is aware of what is happening. The activities may involve physical contact, including assault or non-contact activities, such as involving child/AaR in looking at, or in the production of, sexual online images.

Neglect: Is the persistent failure to meet a child/AaR basic physical and/or psychological needs.

Possible signs of abuse include:

- Unexplained or suspicious injuries such as bruising, cuts, or burns, particularly if situated on a part of the body not normally prone to such injuries or the explanation of the cause of the injury does not seem right.
- Disclosures of what appears to be an abusive act.
- Someone else (child or adult) expresses concern about the welfare of another.
- Unexplained change in behaviour.
- Eating disorders, depression, self-harm or suicide attempts.

Becoming aware of a safeguarding issue

There are many ways in which our employees may become aware of a safeguarding issue and it is important to remember that it is not Colas' responsibility to determine whether abuse is taking place, however, it is our responsibility to pass on concerns raised by employees. Employees need to make sure they pass their concerns to the DSL within Colas. The DSL must then follow the process outlined in this document. Colas employees may become aware of a safeguarding issue by, for example:

- a third party or anonymous allegation is received;
- a person's appearance, behaviour, or statements cause suspicion of abuse and/or neglect;
- a child or young person reports an incident(s) of alleged abuse which occurred some time ago;
- a written report is made regarding the serious misconduct of a worker towards a child or young.

What to do if you are concerned about a child/adult at risk

It is important that you treat any allegations extremely seriously. Never assume that someone else may be dealing with it.

Stage 1

- It is not the responsibility of employees to investigate concerns, but to gather information and refer only; if you have concerns about another member of staff they should be reported to the DSL.
- Always explain to the person that any information they have given will have to be shared with others, if this indicates they and or C/AaR are at risk of harm;
- Notify the Colas DSL (above)

- Record what was said as soon as possible after any disclosure; the person who receives the allegation or has the concern, should email the DSL outlining the incident and should include: date and time of notification, person's name, what was said.
- If the C/AaR is on a work placement, or the incident happened at a careers event the School/ College/other organisation should be notified immediately by the DSL.
- Respect confidentiality and file documents securely in accordance with the GDPR Privacy Notice.

Stage 2

- The DSL should take immediate action if there is a suspicion that a C/AaR has been abused or is likely to be abused. In this situation the DSL should contact the police and/or the safeguarding team of the relevant local authority area, the NSPCC helpline can offer advice on how to refer.

Safe recruitment and conduct

Colas are committed to ensuring the safety of children and Adults at Risk. This policy will be included as part of our staff onboarding process to ensure all staff are aware of their responsibilities.

Staff delivering careers events in schools or Colas premises, or hosting work experience student, should familiarise themselves with Colas guidance..

As the activities we carry out are mostly 'unregulated activities' the large majority will not require a DBS check; should we be asked to carry out activities deemed to be 'regulated', the employee must notify the DSL in writing so a decision can be made as to whether Colas allows the activity to happen, and if so, what measures will be taken to safeguard appropriately.

"Regulated activity" in relation to children is defined in part 1 of sch.4 to the Safeguarding Vulnerable Groups Act 2006 (as amended). The activities covered include: the teaching, training or instruction of children; care for, or supervision of, children; and advice and guidance for children relating to their physical, emotional or educational wellbeing. However, where these activities are provided to a child over the age of 16 in the course of their employment (for example to an apprentice), they are not regulated activities.

Colas employees should not supervise children alone during activities or transport them.

If the person is under 18 we will carry out a young person's risk assessment in accordance with HSE guidance. In the case of Adults at Risk we will carry out a person centred risk assessment known as an Employee Support Plan.

In the case of all Looked After Children/Care Experienced people up to the age of 25 an Employee Support Plan is mandatory for all work placements experience placements and employees.

Allegations against staff

Colas is committed to maintaining an honest and open environment in relation to all aspects of the Company's operations. All allegations will be received without prejudice, Colas therefore encourages any employee who has reasonable concerns or suspicions of malpractice to report them.

Colas will maintain the confidentiality of any employee reporting safeguarding issues in so far as is reasonable, their identity may have to be revealed for internal disciplinary or to report the results of the investigation to the police.

Allegations against staff will be reported to the designated DSL who will progress them via the normal HR channels and report to the relevant policing authority any suspicion of criminal acts.

The NSPCC helpline can offer advice and support for vulnerable adults as well as children and young people.

Regardless of whether a police investigation follows, an internal investigation should take place and consideration is given to the operation of disciplinary procedures. This may involve an immediate suspension and/or ultimate dismissal dependant on the nature of the incident.

Recording and managing confidential information

Concerns will be reported via email to the DSL including name of the alleged victim, the date, and details of the incident. This will be recorded in accordance with our GDPR Privacy Notice which is in accordance with the General Data Protection Regulations.

Whilst all children, young people, and vulnerable adults have the right to confidentiality, should the individual be deemed to be at risk of abuse or harm we will report the concerns to the relevant police force in accordance with this policy.

Distributing/reviewing policies and procedures

This policy should be viewed in alignment with Colas:

- Data Protection Policy
- Whistle Blowing Policy
- Health, Safety & Wellbeing Policy, referencing Y1. Young Persons Health and Safety Guidelines
- Modern Slavery Policy

This policy will be reviewed annually and made freely available to staff via the website and processes as outlined in this policy. This policy will also be given to external organisations we engage with, to ensure they are aware of our and their responsibilities.

Sources of support and guidance

NSPCC Helplines: Safeguarding training resources and consultancy: 0116234724
Help for adults concerned about a child: 0808 800 5000

Guidance on Regulated Activities with Children: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/550197/Regulated_activity_in_relation_to_children.pdf

Guidance on regulated activities with Adults at Risk: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/216900/Regulated-Activity-Adults-Dec-2012.pdf

Guidance on work experience: <https://www.ocr.org.uk/Images/168852-the-ocr-guide-to-best-practice-in-work-experience.pdf>

Chief Executive Officer

F. Lahmamsi

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