



This policy provides the Company's position on safeguarding our colleagues who may be at risk of harm, abuse or neglect.

## Safeguarding Policy

**Document Name:**

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## Policy Statement

Hays Travel believes that all colleagues have the right to be protected from all forms of harm, abuse, and neglect and commit to respond appropriately when risks of harm occur.

## Overview

At Hays Travel we recognise our responsibilities to safeguard our colleagues. Our Safeguarding Policy is based on Government guidance and legislation.

If any colleague or manager becomes aware of a safeguarding concern then they have a duty to report the concern(s), without delay, to our Safeguarding Team.

If any colleague is concerned about their own welfare or safety then they can talk to their Manager or a member of the Safeguarding Team.

The Safeguarding Team will actively respond to any risks of harm and keep records to monitor safeguarding concerns.

## Purpose

The purpose of this policy is to raise awareness of safeguarding and ensure there is a clear process for reporting concerns and that concerns are acted upon without delay.

## Scope

This policy applies to all Hays Travel Ltd, and each group Company, colleagues whether they be contracted on a full-time, part-time, permanent or temporary basis.

## What is Safeguarding?

Safeguarding is protecting our colleagues, young people and vulnerable adults from harm, abuse or neglect both in and outside of work:

- Young people are colleagues that are under 18 years' old, this is particularly relevant for our Apprentices
- Vulnerable adults are colleagues that are 18 years or older, that may have mental health challenges, a disability, or other health conditions that may place them at risk of harm, abuse or neglect

If a colleague has any concerns that a colleague is at risk of harm, abuse or neglect then they should without delay bring this to the attention of the Safeguarding Team.

## Safeguarding Team

Name	Title	Department	Contact Details
<b>HAYS TRAVEL SAFEGUARDING LEAD</b>			
Katie Mottram	Lead People Partner	People Experience	0191 814 8135 Katie.mottram@hays-travel.co.uk
<b>HAYS TRAVEL COMPANY DESIGNATED SAFEGUARDING DEPUTY LEADS</b>			
Vicky Robinson	People Partner	People Experience	0191 814 8135 Vicky.robinson@hays-travel.co.uk
<b>HAYS TRAVEL SAFEGAURDING TEAM</b>			
Nichola Wright	Head of HR	People Experience	0191 814 8135 Nichola.wright@hays-travel.co.uk
Deborah Farmer	People Partner	People Experience	0191 814 8135 Deborah.farmer@hays-travel.co.uk
Josh Wilson	People Partner	People Experience	0191 814 8135 Josh.wilson@hays-travel.co.uk

## Reporting concerns out of hours (after 5:30pm or Saturday/Sunday):

Should a colleague need to report concerns outside of normal office hours they can phone the safeguarding team on: 07786607722.

## What are the signals for safeguarding concerns?

Colleagues are to be vigilant and look out for potential signals that may mean our colleagues are at risk of harm, abuse or neglect.

The possible signals that a colleague is at risk of harm, abuse or neglect (particularly young people or vulnerable adults) could be:

- Isolation or appearing to be quiet/withdrawn from colleagues, friends or family, or appearing to have difficult/controlling relationships with others
- Low self-esteem or constantly seeking reassurance
- Worried about leaving work
- Regular lateness, absence
- Bruises or injuries
- Seeming to be frightened by others
- Sexual language or making comments about sexual activity
- Not having any money
- Changes to normal behaviour, emotional or upset, lack of confidence
- Receiving unwanted texts or calls, or posts through social media
- Changing eating habits, weight loss or increasing weight
- Struggling with training and the lack of development, particularly younger colleagues and vulnerable adults
- Emotional and upset

Please note that this is not an exhaustive list, and any safeguarding concerns are to be raised with a member of our Safeguarding Team without delay.

### Types of abuse may include:

<b>Physical harm/ Domestic Abuse</b>	Physical harm may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm.
<b>Emotional abuse</b>	The persistent emotional ill-treatment that affects emotional development, or welfare, including controlling, financial control, threatening, humiliating, ignoring.
<b>Neglect</b>	Is the persistent failure to meet the young person or vulnerable adult's basic physical and/or psychological needs, likely to result in the serious impairment of health or development.
<b>Sexual abuse</b>	Involves forcing or enticing a person, young person or vulnerable adult to take part in sexual activities, whether or not they are aware of what is happening.
<b>Sexual exploitation</b>	Sexual abuse where a young person (under age 18) is given gifts, drugs, money, status and affection, or being groomed/ befriended in exchange for sexual activities. Abusers may use violence and intimidation to frighten or force a young person, making them feel as if they have no choice. Young people maybe tricked and not understand they are being abused.
<b>Sexual harassment/ bullying</b>	Sexual harassment is any unwanted behaviour of a sexual nature that results in feelings of distress, intimidation or humiliation.
<b>Grooming</b>	Grooming is the process of getting to know and befriending a young person with the intention of abusing them.
<b>Peer abuse</b>	Peer-on-peer abuse is any form of physical, sexual or emotional and financial abuse, and coercive control exercised between young persons, and within their relationships (both intimate and non-intimate), friendships, and wider peer associations.



<b>Modern slavery</b>	Includes slavery, human trafficking, forced labour and domestic servitude.
<b>County Lines</b>	Being used to transport drugs from one area to another, often across police and local authority boundaries (although not exclusively), usually young people, coerced by gangs. The 'County Line' is the mobile phone line used to take the orders of drugs.

### What to do if you believe a colleague is suffering from harm, abuse or neglect

A colleague may confide in you directly or you may observe signals that they are potentially at risk of harm, abuse or neglect. Whichever way you get to know you are to contact a member of the Safeguarding Team without delay.

#### If you notice something:

Contact the Safeguarding Team without delay. When you contact the Safeguarding Team they will collect information from you to help respond to the safeguarding concerns, for example:

- The name of the colleague, their job role, place of work, and any specific needs this colleague might have
- Details of the types of things you have observed; be prepared to discuss what you have noticed and when it happened. Therefore, you may wish to make a note of the things you have noticed to help you when you discuss it with the Safeguarding Team. You should also consider your surroundings when making this call, and ensure that you are in a private and confidential setting

Do not discuss your concerns with anyone other than the Safeguarding Team. They will discuss the concerns with you and you will be asked to complete the Safeguarding Notification Form (Appendix One) within 24 hours.

#### If someone makes a disclosure to you:

This could be the colleague directly or someone who knows the colleague. To support the colleague who has disclosed something to you, the best way you can and to help them feel comfortable is by taking the following steps:

- Make it clear that you're taking what is being said seriously
- Remain calm, approachable and receptive
- Listen carefully without interrupting
- Make a note of the conversation at the time of the conversation and it is important that you make a note in their words, based on what they tell you, not your words
- Acknowledge you understand how difficult this may be
- Reassure the person they have done the right thing in telling you
- Do not make assumptions based on what is being told to you
- Do not make negative or judgemental comments about the colleague's circumstances
- Do not get personally involved in the situation, the Safeguarding Team will take responsibility for responding to the concerns
- Let them know that due to the seriousness of concerns you cannot promise confidentiality, and as you have a duty of care to them you will report the information to the Safeguarding Team
- Contact the Safeguarding Team immediately after the conversation

## What will happen next?

The Safeguarding Lead or Deputy Lead will take responsibility for initially reviewing the information that is shared with them and will take appropriate action. This could include:

- Liaising with external agencies, where this is required, for example Police, NHS, GP Practice, College or Local Education Authority
- Contacting the colleague, to discuss the concerns, reassure them, offer support and the actions that may be taken
- Contacting the colleague's manager to ensure they are aware of the concerns and to discuss how support can be offered to the manager and the colleague and the actions that would be taken
- Assigning the colleague to a Safeguarding People Partner

The Safeguarding Team will keep a record of all safeguarding concerns and the actions that have been taken to support our colleagues, including documenting all conversations in relation to the concerns.

Any conversations that are had with the colleague must be documented on a Safeguarding Follow Up Form (Appendix Two) and can also be found on the Hub and sent to [safeguarding@hays-travel.co.uk](mailto:safeguarding@hays-travel.co.uk).

## Summary of Roles and Responsibilities

### Colleagues and managers

If you believe or you are informed that a colleague is at risk of harm, abuse or neglect you are to contact the Safeguarding Team without any delay. A contact list for this team is given on page 7 of this policy.

All colleagues will have a knowledge and understanding of safeguarding through Learn Upon modules.

### Safeguarding Team

For any reported concerns the Safeguarding Lead, Deputy Lead and/or Safeguarding People Partner will make arrangements where appropriate to protect our colleagues from harm, abuse or neglect. They will:

- Investigate and respond appropriately to concerns that are raised
- Where appropriate liaise with the manager and/or colleague that has raised the concern
- Where appropriate contact the colleague for whom the concern is related to
- Liaise with other agencies where appropriate, Police, NHS, GP Practice, College or Local Education Authority
- Keep an accurate record of safeguarding concerns

The Safeguarding Lead and Deputy Lead will also:

- Complete the required national standard, level 3 safeguarding training when they take up their role and every two years
- Keep their knowledge of safeguarding up to date, including legislation and guidance from Government agencies

## Learning and Development

All colleagues will receive safeguarding training for their role, for example:

- During on-boarding to understand safeguarding and their role
- Those responsible for Apprentices or vulnerable adults
- Regular refresher training to ensure our colleagues understand their safeguarding responsibilities. This should be completed annually as a minimum, in line with the Keeping Children Safe in Education statutory guidance

## Safer Recruitment

The Company will carry out safer recruitment checks for those colleagues that will carry out certain roles, for example working with young people and vulnerable adults.

For some roles, a criminal record check will be carried out using a basic DBS check and we will attempt to gain employment references dated within the past two years prior to your start date with Hays Travel. The Company may also ask relevant questions during the interview process to understand that colleagues are suitable for working with younger people or vulnerable adults. Furthermore, for roles where professional qualifications are required, proof of certification for the qualification is required at interview stage.

Colleagues are not permitted to work unsupervised with young people and vulnerable adults unless a DBS has been completed or is in progress.

## Monitoring

The Safeguarding Team will keep a record of safeguarding concerns and actions that have been taken. This will be documented on specific forms (which can be found in the Appendices if this policy) and loaded to the designated Smart Sheet.

## Smoothwall

Hya Travel use Smoothwall to provide an additional layer of protection for our Apprentice community. Smoothwall monitors IT usage for Apprentices within Head Office, reporting any potential risks of harm to a dashboard which is accessed by the Safeguarding Team. Risks of harm will be assessed and managed in line with the Safeguarding Policy. Smoothwall categorise concerns into the below:

Category Name	Description
Offensive User	A person who uses profanity or vulgar language, without personally abusing others in a bullying manner. One who may introduce subjects or content that is distressing to others. A person looking into adult only video games that contain or allow the user to participate in offensive or disturbing acts. An individual looking into finding methods into accessing the 'Dark Web' or expresses interest in searching for distressing content that can be located on the Dark Web that is not related to legal or illegal sexual content, drugs or weapons.
Sexual Content	A person who uses sexual or pornographic language, terms and descriptions. These may be directed towards others, used in conversation or in other activity on their computer. A person who has been involved with the sharing or receiving of explicit photos and or footage with other people.
Vulnerable Person	A person who makes credible threats of suicide or self-harm or engages in suicidal talk. Someone who appears to be using or involved with illegal drugs,

	<p>substances or alcohol. A person who appears to be at risk of non-sexual abuse or is giving indications of suffering from an eating disorder. Someone who is severely distressed or appears at risk of some form of harm. An individual showing signs that they intend to take part in a dangerous online trending challenge either by their own motives, fear of missing out or peer pressure. Some examples of potential harm which this category covers are detailed below, however this is not an exhaustive list: suicide, self-harm, neglect, domestic abuse, FGM, drugs/substance abuse, alcohol, gambling, mental health issues, general health concerns.</p>
Bullying/violence	<p>A person who intimidates, harasses, excludes or is violent towards others – or who themselves is suspected of receiving such activity. Someone who may post material intended to shame and humiliate their target and who regularly engages in personal abuse against others. A person who uses hate speech or discriminatory language without evidence of extremism.</p>
Oversharer	<p>A person who shares their own or others’ personal information that would make them contactable online or offline or would otherwise result in a serious personal data breach</p>
Terrorism/ Extremism	<p>A person who makes direct threats to undertake acts of terrorism including but not limited to using weapons, bombing, biological attack, kidnap and execution, against a high-profile person, location, or the general public. A person who glorifies or promotes terrorist activity. One who encourages others to carry out acts of violence or intimidation against others in the pursuit of their political, ideological or religious aims. A person who encourages demonization of those outside their ideological sphere, often with the use of political or religious propaganda.</p>
General Risk	<p>This is used for situations where our team have spotted something unusual or concerning which they feel the school should be alerted to, which doesn’t fit clearly inside any of the other category descriptions.</p>
Grooming	<p>A suspected adult (aged 18 or over) who is attempting to coerce a child or young person to take part in sexual activity with themselves or others. The perpetrator might establish trust with the child by appearing sympathetic to their problems and appear to be on their side. They may encourage the child to share details about their life and offer them gifts. They may attempt to desensitize the child to sexual discussion and imagery before encouraging them to participate. This category also applies to a child or young person who is attempting to coerce another child, young person or an adult to take part in sexual activity with themselves or others.</p> <p>A child or young person who appears to be in contact with a person who is over the age of 18 who may be encouraging them to become involved in sexual activity with that adult or others. This would also apply if a child or young person who appears to be in contact with another child or young person to encourage them to be involved in sexual activity with themselves or others.</p> <p>A child or young person who has revealed information which suggests they have been subjected to sexual abuse by a person or people known or unknown to them.</p>

Smoothwall is in place for all Apprentices in Head Office and the Retail Division.

### Key Areas

All safeguarding concerns are of great importance. The below sets out in more detail growing areas of concern where early signs are of the utmost importance and require urgent response:

## **County Lines**

### **What are County Lines?**

County Lines is where illegal drugs are transported from one area to another, often across police and local authority boundaries (although not exclusively), usually by children or vulnerable people who are coerced into it by gangs. The 'County Line' is the mobile phone line used to take the orders of drugs. Importing areas (areas where the drugs are taken to) are reporting increased levels of violence and weapons-related crimes as a result of this trend.

### **Signs to look out for**

- An increase in visitors and/or cars to a place of work
- New faces appearing at the place of work
- Change in mood and/or demeanour (e.g. secretive/withdrawn/aggressive/emotional)
- Substance misuse and/or drug paraphernalia
- Changes in a colleague dress
- Unexplained, sometimes unaffordable new things (clothes, jewellery, cars etc.)
- Absenteeism, consistent non-attendance and/or disengagement from learning and the workplace
- An increase in anti-social behaviour
- Unexplained injuries

### **What to do if you have concerns**

If you have concerns in regards to a colleague who may be involved in County Lines, you must follow the safeguarding process (Appendix Three).

## **Child Sexual Exploitation**

### **What is Child Sexual Exploitation?**

Child sexual exploitation (CSE) is a type of sexual abuse, where a child or young person is exploited and are given things like gifts, drugs, money, status and affection, in exchange for performing sexual activities. Children and young people are often tricked into believing they are in a loving and consensual relationship, which is known as grooming. They may trust their abuser and not understand that they're being abused.

CSE can happen in person or online. An abuser will gain a child's trust or control them through violence or blackmail before moving onto sexually abusing them. This can happen in a short period of time.

### **Signs to look out for**

- Unhealthy or inappropriate sexual behaviour
- Being frightened of some people, places or situations
- Being secretive
- Sharp changes in mood or character
- Having money or things they can't or won't explain
- Physical signs of abuse
- Alcohol or drug misuse
- Pregnancy
- Having a partner that is significantly older than them

## **What to do if you have concerns**

If you have concerns in regards to a colleague who may be involved in CSE, you must follow the safeguarding process (Appendix Three).

## **Sexual Harassment**

### **What is Sexual Harassment?**

Sexual harassment is unwanted behaviour of a sexual nature, which could be a one off incident or repeated incidents, or ongoing behaviour. Sexual harassment, whether it was intended or not, can be humiliating, intimidating, degrading, or offensive to the person receiving it.

### **Examples Sexual Harassment**

Sexual harassment can take place in person or in other ways, for example online through things like email, social media or messaging tools. Examples include, but are not limited to:

- Flirting, gesturing or making sexual remarks about someone's body, clothing or appearance
- Asking questions about someone's sex life
- Telling sexually offensive jokes
- Making sexual comments or jokes about someone's sexual orientation or gender reassignment
- Displaying or sharing pornographic or sexual images, or other sexual content
- Touching someone against their will, for example hugging them
- Sending unwanted suggestive or lewd emails, letters or other communications or sharing images of a sexual nature around the workplace or displaying posters, items or screensavers of a sexual nature
- Inappropriate and suggestive touching, kissing, rubbing or caressing of a person's body and/or clothing
- Repeatedly asking for dates despite being rejected
- Asking for sexual favours
- Making sexually offensive gestures, remarks or facial expressions
- Sexual assault

### **How to Raise a Concern**

If you feel like you, or a colleague is being sexually harassed at work it is important that you raise this with the Safeguarding Team, contact details for which can be found on page 7 of this policy. Any concerns raised will be dealt with in the strictest confidence, unless we believe there is a serious risk.

If you feel that you are being sexually harassed by a customer it is equally important that you raise this with the Safeguarding Team so that measures can be put in place.

## **Safeguarding an Apprentice**

When it comes to Apprentices, we have a further duty of care to protect them from harm and abuse. The below details the extra measures which Hays Travel have in place to protect their Apprentices:

- Apprentices are not permitted to be key holders for the branch and should not be responsible for opening/closing the branch

- Any Apprentice under 18 years of age is not permitted to work with just one other colleague, unless the other colleague has completed a basic DBS
- Apprentices must be recruited into a branch that has a Manager or Assistant Manager
- If an Apprentice is required to be in a closed door room with another colleague, then the door must have glass in it so that all parties are visible. The colleague conducting the meeting must be positioned as close to the door as possible
- Colleagues must be mindful of how and where they sit at a desk with an Apprentice. Their whole body must be visible at all times
- An Apprentice cannot be counted in the branch headcount if there are low numbers of colleagues working (normally a full time equivalent of 3)
- Apprentices must have their days off during the working week, and rest days must be consecutive if the Apprentice is under the age of 18. An Apprentice is required to work a minimum of a 30 hour working week and a maximum of a 40 hour working week
- If an Apprentice is under the age of 18, then they must not work more than 8 hours a day
- Apprentices under 18 years of age cannot be asked to go on relief to another branch
- Apprentices over 18 years of age can go on relief but only if there are a minimum of two other qualified members of colleagues in the branch requiring relief
- All Apprentices must be allocated a 1 hour lunch break. If the Apprentice is under the age of 18, their break should commence within 4.5 hours of them starting work
- Apprentices are not to be left in branch on their own
- Personal relationships are not to be formed between apprentices under the age of 18 and any other colleague in the business
- Apprentices under the age of 18 should not be befriended on social media sites by members of the Learning and Development department
- Apprentices under the age of 18 should not car share with any other colleagues on a one-to-one basis, including to and from work

## **Disclosure and Baring Service (DBS)**

Basic DBS checks will take place every three years for colleagues within the Safeguarding Team. A record for this will be held by the Safeguarding Team and People Services.

Where colleagues work on a full time equivalent of 3 and an Apprentices under the age of 18, colleagues will be required to complete a basic DBS check.

## **Enforcement**

This policy is non-contractual and can be changed or amended at any time without notice and the most up to date policy will be available on the Company intranet (the "HUB").

**Safeguarding Notification Form**

**STRICTLY CONFIDENTIAL**

This form is to be used by colleagues to record safeguarding concerns. Please note that any sections marked with \* is required information to be recorded. The completed form is to be emailed to the designated Safeguarding Team, details of which can be found at the bottom of this form.

<b><u>1. Referrers Details (Person completing the form)</u></b>	
Name:*	
Branch/Department:*	
Job Title:*	
Contact Number:*	
Email Address:*	

<b><u>2. Colleague Details</u></b>	
Name:*	
Employee Number:	
Branch/Department:*	
Job Title*	
Contact Number:	
Email Address:	
Any specific needs (e.g. preferred language, disabilities, etc.):	



**3. Nature of Safeguarding Concern\***

Please give a detailed factual account of the concerns and circumstances that have prompted you to complete this safeguarding form. This may include substance misuse, domestic abuse, physical abuse, mental health, and/or self-harm. You should detail how you become aware of the concerns, what signs you have noticed, and what was discussed with the person concerned (where relevant).

All details below should be factual and you should not detail any personal opinions. Where possible, you should include the following information: who, what, where, when, and why.

Is the person in danger of further risk?*	Yes	No	Not Sure
Is the person a risk to others?*	Yes	No	Not Sure
The person concerned is now:*			
(Describe current condition and whereabouts, e.g. living in a hostel, in a safe environment, in hospital, mental state etc.)			

<b><u>4. Details of the Concerns</u></b>	
Are you recording:*	A disclosure made directly to you by the employee? <input type="checkbox"/>  A disclosure or concerns from a third party? <input type="checkbox"/>  Your concerns? <input type="checkbox"/>
Date and time of disclosure:*	
Are there any previous concerns that you are aware of?*	Yes      No      Not Sure

<b><u>5. Actions</u></b>	
Were emergency services involved?*	Yes      No      Not sure
Were any other external agencies contacted?*	Yes      No      Not sure
Where relevant, was first aid administered in branch/department?*	Yes      No      Not sure
Details of first aid and who administered?	
Please confirm the member of the Safeguarding Team whom you have discussed your concerns with:	

**6. Consent**

Please note that confidentiality should not be promised, as it may be deemed appropriate in cases of significant risk that information may need to be shared with next of kin, or other professionals/organisations. The Company's Safeguarding Team will determine any appropriate steps to be taken.

Is the colleague concerned aware that a safeguarding notification is being completed for them?*	
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Has the colleague concerned been informed and consented to the sharing of information with other professionals/organisations?*	
--	--

In the case of a serious incident does the individual consent to the Safeguarding Team contacting their next of kin?*	
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**7. Any further information**

Please give any further information you may feel that the Safeguarding Team would benefit from knowing.

**8. Signatures**

Referrer	Sign:	Date:
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**PLEASE EMAIL THIS COMPLETED FORM TO [SAFEGUARDING@HAYS-TRAVEL.CO.UK](mailto:SAFEGUARDING@HAYS-TRAVEL.CO.UK) AND ENSURE THAT YOUR COPY OF THE FORM IS DISPOSED OF IN A CONFIDENTIAL MANNER. ANY FURTHER CONVERSATIONS YOU HAVE REGARDING THIS SAFEGUARDING INCIDENT NEED TO BE DOCUMENTED USING THE FOLLOW UP FORM, WHICH CAN BE FOUND ON THE HUB AND IN THE APPENDIX OF THE SAFEGUARDING POLICY.**

**Safeguarding Follow Up Form**

**Strictly Confidential**

In line with Hays Travel’s Safeguarding Policy, this form is to be filled out when a conversation is had with a colleague who is known to the Safeguarding Team due to safeguarding concerns. Completed forms need to be sent to [safeguarding@hays-travel.co.uk](mailto:safeguarding@hays-travel.co.uk).

Colleague Name:	
Employee Number:	
Colleague Name Completing Form:	
Date of Conversation:	
<b>Details of Conversation</b>  <i>Document in detail the discussion that has been had, using the following information where possible:</i> <ul style="list-style-type: none"> <li>- Who</li> <li>- What</li> <li>- Where</li> <li>- When</li> <li>- Why</li> <li>- Signposting</li> </ul>	
<b>Further Action Needed?</b>  <i>This could be from yourself, the individual, someone else in the Company, or someone external.</i>	
Signed:	
Dated:	

## Safeguarding Process

