

Safeguarding Policy

Preventing and responding to harm involving children and adults at risk.

Document owner: Max Pocock, Lead Consultant

Operational role: Accountable safeguarding owner; a competent safeguarding lead must be appointed for higher-risk work

Version: 1.0

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Review due: 23 July 2027, or earlier after a concern, legal change or material service change

Applies to: Managed Services Ltd and every person or organisation acting for it

Safety, dignity and welfare take priority over timetable, commercial pressure, research completeness and reputational concern. Anyone can stop an activity where they reasonably believe a person may be unsafe.

1. Purpose and scope

Managed Services Ltd is committed to preventing harm and responding appropriately to concerns involving anyone who comes into contact with its work. Enhanced controls apply when work involves children or adults at risk.

This policy covers business development, research, consultation, interviews, workshops, project visits, online interaction, events, data handling and delivery involving separately engaged human specialists, subcontractors or suppliers.

Safeguarding law and referral arrangements differ across the United Kingdom. Before relevant work begins, the company will identify the jurisdiction, statutory framework, buyer and host procedures, local safeguarding contacts, actual activities and regulated-role implications. The strongest applicable requirement governs.

2. Principles

Managed Services Ltd will:

- put safety, rights, dignity and wellbeing first;
- take concerns seriously and act without avoidable delay;
- use person-centred and, where relevant, child-centred practice;
- make participation voluntary, informed, accessible and free from coercion;
- never promise absolute confidentiality where safety may require information sharing;
- share only relevant and necessary information with those who need it;

- avoid investigating or asking leading questions after a disclosure;
- use proportionate recruitment, role checks, supervision and conduct controls;
- provide a route outside the immediate delivery line for concerns about the team or safeguarding lead; and
- learn from concerns, near misses and complaints without exposing the affected person.

3. Definitions

For this policy:

- a **child** is a person under 18, subject to the applicable legal framework;
- an **adult at risk** is an adult whose circumstances, care or support needs may make them unable to protect themselves from abuse, neglect or exploitation under the applicable national framework;
- **safeguarding** means preventing and responding to abuse, neglect, exploitation, harassment and other avoidable harm; and
- a **concern** includes a disclosure, allegation, observation, behaviour, incident, pattern, near miss or information suggesting that a person may be unsafe.

Being vulnerable in an ordinary sense does not automatically make an adult an "adult at risk" under every legal framework. The company will not use labels instead of assessing the actual concern and applicable duties.

4. Accountability

Max Pocock is the accountable owner of this policy and decides whether work may proceed. This ownership does not claim professional safeguarding qualification, statutory designation, DBS or PVG status.

Where an engagement involves direct or higher-risk contact with children or adults at risk, Managed Services Ltd will not begin that activity until it has:

1. appointed a named safeguarding lead with evidence of competence and availability proportionate to the work;
2. obtained and reconciled buyer, host and local procedures;
3. assessed each actual role for legally required disclosure or membership checks;
4. confirmed training, supervision and escalation arrangements;
5. approved participation, consent, accessibility, data and incident materials; and
6. recorded a mobilisation decision.

A separately engaged human specialist or other supplier is not assumed to have safeguarding competence or clearance. Evidence must be checked for the specific role and jurisdiction.

5. Safer selection and mobilisation

Before a person undertakes safeguarding-relevant work, the company will:

- define the activities, contact, setting, frequency, supervision and authority;
- assess whether the role is regulated and which DBS, Disclosure Scotland/PVG or AccessNI rules apply;
- obtain only checks that are legally eligible and required or justified for the activity;
- verify identity, relevant experience, references, conduct expectations and conflicts proportionately;
- record the decision and reviewer;
- reassess if the activity or supervision changes; and
- prevent deployment until mandatory evidence is complete.

No tender or client document may state that a person is trained, checked, cleared, registered or qualified without current documentary evidence.

6. Expected conduct

Everyone acting for Managed Services Ltd must:

- maintain professional boundaries and use approved communication channels;
- avoid favouritism, humiliating, sexualised, discriminatory, threatening or exploitative conduct;
- never exchange unnecessary personal contact details or use disappearing-message functions for project contact;
- avoid isolated one-to-one contact unless it is justified, risk-assessed and appropriately visible or supervised;
- use agreed accessible venues or secure remote arrangements;
- obtain the permissions and informed agreement required for participation, recording and publicity;
- make it easy to pause, skip a question, leave or withdraw;
- avoid promises, gifts or incentives that could create pressure or dependency;
- record only information necessary for the approved purpose; and

- report concerns immediately.

Photography, audio, video, attributed quotations and publicity require separate, specific controls. Agreement to take part in research or a service does not automatically authorise publicity.

7. Planning safe participation

Before an interview, workshop, visit or other participant activity, the plan must address:

- who is being invited, why and through which trusted route;
- age, capacity, consent, assent and withdrawal requirements;
- understandable information and accessible formats;
- communication, language, cultural, sensory, physical and support needs;
- venue, remote platform, travel, lone-working and emergency arrangements;
- who will be present and each person's role;
- topics that could cause distress or prompt disclosure;
- recording, data use, retention and confidentiality limits;
- local support and referral routes; and
- complaint and outside-line escalation routes.

Questions must not unnecessarily require someone to disclose trauma, poverty, health, disability, immigration status, family circumstances or another person's sensitive information.

8. Responding to distress or a disclosure

If someone is distressed:

1. pause the activity and check what they need;
2. do not press for detail or continue simply to complete the work;
3. use the agreed support or trusted-person route;
4. record the minimum necessary facts; and
5. inform the safeguarding lead without avoidable delay.

If someone discloses harm or a concern is observed:

1. listen calmly;
2. do not investigate, challenge, confront the alleged person, ask leading questions or promise secrecy;

3. explain that relevant information may need to be shared to help keep people safe;
4. record the person's words and immediate facts as accurately as possible, separating fact from interpretation;
5. contact the safeguarding lead and follow the applicable local, host and statutory route; and
6. preserve relevant records securely and restrict access.

If there is immediate danger or a medical emergency, call 999. Where a crime may have been committed or urgent statutory advice is required, use the applicable police, local authority or national safeguarding route.

9. Allegations involving the company or delivery team

An allegation involving Max Pocock, a separately engaged human specialist, subcontractor, supplier or client contact must not be managed solely by the person concerned.

The recipient must preserve immediate safety, avoid confrontation or informal fact-finding, and use an independent route appropriate to the circumstances. This may include the buyer's safeguarding lead, host safeguarding lead, local authority, police, regulator or independent legal adviser.

Managed Services Ltd may suspend contact, access or duties while an external or internal process is considered. Suspension is a protective measure, not a finding of wrongdoing.

No person will suffer retaliation for raising a concern honestly or participating in a safeguarding process.

10. Information sharing and records

Safeguarding information will be:

- recorded promptly, factually and with a unique reference;
- limited to what is relevant and necessary;
- stored separately from general project material where practical;
- accessible only to people who need it for safety, legal or case-management reasons;
- shared securely through the agreed route;
- retained and deleted under the applicable legal, contractual and data-protection requirements; and
- excluded from ordinary analysis and reporting unless lawfully required and safely anonymised.

Consent is not always required to share information for safeguarding. The lawful basis, necessity, proportionality and reason for sharing or not sharing must be recorded where material.

11. Online, remote and technology-enabled work

Remote work must use approved accounts and platforms, clear attendance and identity arrangements, safe locations, appropriate visibility or supervision, and an emergency contact route.

Safeguarding material or identifiable participant information must not be placed in public generative-AI, consumer transcription or unapproved messaging services. Technology must not make a safeguarding decision without meaningful human review and accountability.

12. Complaints, reporting and support

A safeguarding concern may be raised verbally or in writing through any company, buyer or host contact. No special form is required.

Safeguarding matters are triaged immediately and are not held for the ordinary complaints timetable. The company will explain what it can, the limits of confidentiality and the route being followed, without compromising safety or another person's rights.

The person raising the concern should be offered an accessible communication route and signposted to appropriate independent or statutory support where this can be done safely.

13. Mobilisation gate

Safeguarding-relevant activity must not begin until every applicable control is evidenced:

- named competent safeguarding lead and outside-line escalation route;
- jurisdiction, regulated-role and disclosure-check assessment;
- buyer, host and local safeguarding procedures and contacts;
- role-specific briefing, conduct standards and supervision;
- participant information, permissions, withdrawal and publicity controls;
- accessible participation and reasonable-adjustment plan;
- approved venue, online, travel, lone-working and emergency controls;
- data flow, privacy, security, retention and breach arrangements;
- incident, complaint and referral records ready;
- required insurance and contractual responsibilities confirmed; and
- independent or buyer review completed where the risk or contract requires it.

Failure of any applicable item is a stop decision, not an administrative exception.

14. Monitoring and review

The policy will be reviewed at least annually and after a concern, near miss, complaint, legal change, significant delivery change or learning review. The review will consider patterns, response timeliness, role competence, referral quality, information handling and whether external safeguarding advice is needed.

15. Official references

Official sources checked on 23 July 2026:

1. Department for Education, Working together to safeguard children 2026 - [View official source](#)
2. Scottish Government, National Guidance for Child Protection in Scotland 2021 - updated 2023 - [View official source](#)
3. Welsh Government, Working Together to Safeguard People - statutory guidance - [View official source](#)
4. Department of Health Northern Ireland, Co-operating to Safeguard Children and Young People in Northern Ireland - [View official source](#)
5. Department of Health and Social Care, Care and support statutory guidance - safeguarding - [View official source](#)

16. Document control

This is the company-wide minimum. Tender-specific copies must be checked against the current law, jurisdiction, buyer and host requirements before issue or mobilisation.