

# Safeguarding policy

## Document properties

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Monitor and review	<ul style="list-style-type: none"> <li>The Policy Review Group and the Policy Owner will review the policy on an annual cycle to ensure continued compliance.</li> <li>The Audit and Risk Committee will regularly monitor the effectiveness of all policies as appropriate.</li> <li>The formal review process will take place every three years.</li> </ul>

## Change control

Date	Version	Page	Changes made (include rationale and impact on practice)
Dec 2022	V1.0	All	New policy
Feb 2024	V1.1	All	Updated job titles and used new branded template
23.10.25	V2.0	All	Reviewed and updated the whole policy, approved by ARC
Dec 2025	V2.1	All	Formatted in the new policy template

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## Associated documents

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Whistleblowing policy

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Bullying and harassment policy

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Grievance policy

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Diversity and inclusion policy

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Wellbeing support and guidance

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Complaints procedures

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## 1. Summary and purpose

- 1.1 AAT is committed to ensuring that all those studying AAT qualifications have access to a safe learning and assessment environment, and individuals who come into contact with us through their work are protected from all forms of abuse in their interactions with AAT.
- 1.2 AAT is committed to ensuring all those who become or are members or licensed members with AAT can safely report any safeguarding concerns related to learners with AAT, members, licensed members or themselves to the AAT safeguarding team.
- 1.3 AAT aims to safeguard each person it comes into contact with through its work by:
  - valuing them, listening to and respecting them;
  - maintaining this policy and related procedures, ensuring staff, representatives<sup>1</sup>, AAT approved organisations and the public have access to and use them correctly;
  - recruiting staff and representatives safely by ensuring appropriate checks are made in line with current government guidance and legislation, as appropriate to their roles;
  - ensuring all assessments, communications, documentation, records, materials, personnel deployment, processes and procedures in no way undermine the interests of those AAT comes into contact with but actively seek to protect them;
  - respecting confidentiality when sharing information about concerns with agencies who need to know and appropriately involving parents, carers, children and adults at risk;
  - providing effective support and management for staff and representatives.
- 1.4 This document sets out the policy, principles and approach that AAT will adopt to safeguarding all those it comes into contact with. The document will be reviewed as necessary, in response to changes in best practice, always following a serious incident, and at least once a year.
- 1.5 AAT makes a positive contribution to a strong and safe community and recognises the right of every individual to stay safe. This policy seeks to ensure that AAT undertakes its responsibilities regarding the protection of all those it comes into contact with through its work and that it investigates and responds to concerns relating to those interactions appropriately.

## 2. Scope and applicability

- 2.1 This policy applies to AAT staff and representatives, AAT approved organisations, and other third parties connected to AAT, and can be referred to by any person wishing to report a safeguarding concern or incident. Failure to adhere to this policy by AAT staff may result in disciplinary action or for AAT representatives, members and licensed members, appropriate action under the relevant contract.
- 2.2 AAT approved organisations should maintain and comply with their own safeguarding policy, which must be made available to AAT on request. The policy should include procedures for dealing with allegations or suspicions of abuse reported by staff, students, parents or other persons and bringing these to AAT's attention in accordance with this

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<sup>1</sup> For the purpose of this policy, the term 'representative' refers to any individual contracted to undertake services for AAT.

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policy. Approved organisations should nominate a suitable individual who will act as safeguarding officer. It will be for approved organisations to lead and manage any safeguarding referrals made in respect of students and staff in your organisations.

### 3. Terms and definitions

3.1 In this policy, the following terms have the definitions as shown:

- **Adult at risk:** Any person aged 18 or over who is or may be in need of care and support (e.g., health care, relevant personal care or social care) and is experiencing or is at risk of abuse or neglect and, as a result of this, is unable to protect themselves from either the risk or experience of abuse or neglect. AAT is aware that it may have staff (including Trustees) and other connections who are adults at risk.
- **Child:** A person who has not yet reached their 18th birthday, irrespective of the age of majority in the country where a child is located, or in their home country.
- **Safeguarding:** The range of measures in place to protect the people who come into contact with AAT through its work from abuse and mistreatment of any kind (including neglect). While safeguarding principally refers to the prevention of harm and abuse, it also encompasses practices to handle incidents and/or complaints.
- **Representative:** For the purpose of this policy, the term 'representative' refers to any individual contracted to undertake services for AAT
- **Designated Safeguarding Officer:** The lead person for safeguarding in AAT, presently the Executive Director of Customer, Partnerships and Innovations (the DSO)
- **Deputy Designated Safeguarding Officer:** the deputy lead for safeguarding in AAT presently the Head of People Support Services (the Deputy DSO)
- **Safeguarding Lead Trustee:** A named person within the trustees to have lead responsibility at trust level for safeguarding. Presently, this is the Chair of the Audit and Risk Board

3.2 **Abuse or harm:** all types of harm and abuse. Harm can take many forms, including the following:

- **Abuse of positions of trust:** Any kind of offence where an individual over the age of 18 year old, takes advantage of their usual, regular and responsible professional role when interacting with a child or adult at risk.
- **Bullying or harassment (including cyber abuse):** "Bullying is behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally. Bullying can take many forms (for instance, cyber-bullying via text messages, social media or gaming, which can include the use of images and video) and is often motivated by prejudice against particular groups, for example on grounds of race, religion, gender, sexual orientation, special educational needs or disabilities, or because a child is adopted, in care or has caring responsibilities. It might be motivated by actual differences between children, or perceived differences." Department for Education definition from Preventing and tackling bullying July 2017.

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- **Criminal exploitation:** Where an individual or group take advantage of an imbalance of power to manipulate, deceive or coerce a child or adult at risk into engaging in criminal activity, such criminal activity is usually, but not exclusively, for the benefit of the individual or group and the child or adult at risk undertaking the activity usually in exchange for something material they want or need.
  - **Commercial exploitation:** Where an individual or group take advantage of an imbalance of power to manipulate, deceive or coerce another person into buying, selling or bartering a product, person or property for financial gain. This may occur within a variety of settings, not limited to members and licensees work, within relationships and voluntary roles.
  - **Data breaches**
  - **Discriminatory abuse:** On any grounds, including but not limited to age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race (including colour, nationality, ethnic or national origin), religion or belief, sex, or sexual orientation.
  - **Domestic abuse:** The definition of domestic abuse is set out in the Domestic Abuse Act 2021. The full definition is set out in Appendix 3.
  - **Emotional harm:** The persistent emotional maltreatment of a person such as to cause severe and persistent adverse effects on the person's emotional development. It may involve conveying to someone that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. Some level of emotional abuse is involved in all types of maltreatment, though it may occur alone.
  - **Extremism and radicalisation:** The process through which a person begins and continues to support and/or becomes involved in extremist ideologies and can include using violence, sharing ideas and ideologies and attempting to recruit and radicalise others into acts of extreme behaviour and/or violence.
  - **Female genital mutilation**
  - **Financial or material abuse:** Where an individual takes advantage of an imbalance of power to steal, sell assets, commit fraud, withhold, misuse or misappropriate property, possessions or benefits belonging to someone else.
  - **Forced marriage:** Where one or both parties to a marriage do not consent to the marriage and pressure or abuse is utilised to force them into the marriage. It also includes where actions steps are taken to make someone marry before they turn 18 years old even if there is no abuse or pressure.
  - **Institutional or organisational abuse:** Including regimented routines and cultures, unsafe practices, lack of person-centred care or treatment.
  - **Human trafficking**
  - **Modern slavery:** Covering slavery (including domestic slavery), human trafficking and forced labour.
  - **Neglect and acts of omission:** Including withholding the necessities of life such as medication, food or warmth, ignoring medical or physical care needs.

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- **Neglect:** The persistent failure to meet a person's basic physical and/or psychological needs, likely to result in the serious impairment of the person's health or development. It can include withholding the necessities of life such as medication, food or warmth, ignoring medical or physical care needs. Neglect may involve a parent or carer failing to provide adequate food and clothing; shelter, including exclusion from home or abandonment; failing to protect a child or adult at risk from physical and emotional harm or danger; failure to ensure adequate supervision including the use of inadequate caretakers; or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a person's basic emotional needs.
  - **Physical harm:** May involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in, a child or adult at risk.
  - **Psychological or emotional abuse:** Including belittling, name calling, threats of harm, intimidation, isolation.
  - **Self-neglect:** Covering a wide range of behaviour which shows that someone isn't caring for their own personal hygiene, health or surroundings. It includes behaviour such as hoarding.
  - **Sexual harm:** The actual or threatened physical intrusion of a sexual nature whether by force or under unequal or coercive conditions. This includes sexual exploitation, being any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes, including profiting monetarily, socially, or politically from the sexual exploitation of another; and sexual harassment which means unwelcome sexual advances (without touching). It includes requests for sexual favours, or other verbal or physical behaviour of a sexual nature, that may create a hostile or offensive environment.
  - **Possible signs of abuse include:**
    - unexplained or suspicious injuries such as bruising, cuts or burns;
    - disclosures relating to, or descriptions of, what appears to be an abusive act;
    - someone else expressing concern about a person's welfare;
    - unexplained changes in behaviour such as withdrawal or sudden outbursts of temper;
    - inappropriate sexual awareness (in children) or sexually explicit behaviour;
    - distrust of adults by children;
    - difficulty in making friends;
    - eating disorders, depression and self-harm.

### 3.3 Roles and responsibilities:

- **The DSO and Deputy DSO** have overall responsibility for implementing and monitoring this policy, which will be reviewed regularly and may be changed from time to time, or when legislative changes apply. Detailed explanations of the DSO, Deputy DSO and the **Lead Safeguarding Trustee** are included in Appendix 1.

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- **The Executive Leadership Team**, senior managers and line managers are responsible for ensuring the policy is adhered to and the principles are applied consistently. This includes ensuring team members are working in line with the framework set out in this policy, and appropriate considerations or assessments of safeguarding measures are in line with data protection and associated regulations and policies.
  - **The AAT Board** ensures there are effective policies and procedures in place and a designated safeguarding officer is in place.
  - **The People team** is responsible for training appropriate to roles and responsibilities in line with this policy.
  - **Employees** are responsible for ensuring they follow this policy and discuss any questions with their line manager, DSO or Deputy DSO.

## 4. Policy details

- 4.1 **Safeguarding measures:** AAT will promote the welfare of all those it has a responsibility for through the following measures:
- 4.1.1 **Safe recruitment:** When appropriate, based on the role, AAT will carry out appropriate safe recruitment checks on staff, including the highest level of criminal record check (or equivalent) that AAT is entitled at law to carry out for that role and where deemed appropriate, online checks for online presence in line with current government guidance. This may mean carrying out a DBS (Disclosure and Barring Service) check or an equivalent check in a country outside the UK and will otherwise include all of the checks set out in AAT's relevant recruitment guidance. All roles will be risk-assessed to determine if they are eligible for a DBS check and at what level. The level of the relevant check will depend on the nature of the activity being carried out by the staff member and, in some cases, the location where the relevant activity is performed. For those positions where a DBS check above a basic disclosure check is identified as necessary, all application forms, job adverts and recruitment briefs will contain a statement that an application for a DBS check (criminal record check) certificate will be submitted in the event of the individual being offered the position, together with requiring two formal written references from previous employers.
- 4.1.2 **Designated Safeguarding Officer, Deputy Designated Safeguarding Officer and Safeguarding Lead Trustee:** The Executive Director of Customer, Partnerships and Innovation will be the designated contact person for safeguarding issues at AAT (the "DSO"). The Deputy DSO (the "Deputy DSO") will be the Head of Human Resources. The Safeguarding Lead Trustee will be the Chair of the Audit and Risk Board. The DSO and Deputy DSO can be contacted at [safeguarding@aat.org.uk](mailto:safeguarding@aat.org.uk). A summary of each role is shown at Appendix 1.
- 4.1.3 **Communication guidelines and data protection:** AAT will ensure that the management of information, documentation (including DBS records) and photography is handled in accordance with AAT's relevant data protection policies and privacy notices. The values of human dignity, respect and truthfulness underlie AAT's communications and guide internal policies and procedures.



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- 4.1.4 **Reporting and responding to safeguarding concerns:** AAT staff, representatives, AAT approved organisations, and other third parties connected to AAT must report safeguarding concerns, suspicions, allegations and incidents to the DSO in line with the procedure below. AAT takes seriously and promptly investigates all safeguarding concerns or allegations and takes appropriate action if this policy is not complied with. AAT reports safeguarding incidents, allegations or concerns to external authorities and regulators as appropriate and in accordance with applicable laws and best practice. Prior to making any such report, AAT will assess the risk associated with making the report, including the risks of further harm to individuals involved and other unintended consequences.
  - 4.1.5 **Learning and improvement:** AAT will use the records of safeguarding incidents (including reports to the Audit and Risk Board) to learn lessons from past incidents/concerns and implement any learning points that arise, whether relating to how the incident was handled or to how to prevent it occurring in the first place. This will include the development of any training deemed necessary following such an incident.
  - 4.1.6 **Staff training and development:** AAT ensures that all staff and representatives are aware of and have access to this policy and its associated procedures and provides training for staff and representatives on its interpretation and use. AAT will also ensure any training needs identified as part of the learning and improvement above, are rolled out to relevant staff in a timely fashion.
  - 4.1.7 **AAT Governance:** Where appropriate, assessing and mitigating the risk of harm as a result of AAT's work is incorporated into AAT's risk registers. Safeguarding concerns and related issues are reported to the Audit and Risk Board (with appropriate reporting through to the AAT Board) enabling common concerns and any risks or gaps that need to be addressed to be identified.
  - 4.1.8 **AAT approved organisations:** AAT carries out checks (during approval and on-going external quality assurance activities) to ensure that each approved organisation has an appropriate safeguarding policy in place. AAT approved organisations are also advised to ensure an appropriate qualified person is present during any face to face meetings that involve AAT staff or representatives, and children or adults at risk within the organisation.

**Principles to be observed by AAT staff and representatives:**

- 4.2 AAT staff and representatives must, to the extent that they are able to do so:
  - 4.2.1 ensure the health, safety and welfare of any person with whom AAT comes into contact through its work;
  - 4.2.2 minimise the risks of harm to the welfare of any person with whom AAT comes into contact through its work;
  - 4.2.3 adopt a relaxed, informal and friendly approachable manner but remain professional at all times;
  - 4.2.4 ensure behaviour, language, gestures etc., are appropriate and above reproach;
  - 4.2.5 where at all possible, work in an open environment, avoiding private or unobserved situations with children and adults at risk;
  - 4.2.6 keep a physical and professional distance;



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- 4.2.7 treat all people equally, with respect and dignity;
  - 4.2.8 ensure that any activities are appropriate to the age, maturity and ability of children and adults at risk;
  - 4.2.9 consistently display high standards of personal behaviour and appearance;
  - 4.2.10 where there are concerns about the welfare of any person with whom AAT comes into contact through its work, take immediate and appropriate action to address those concerns; and
  - 4.2.11 record and report any allegations or concerns in line with this policy.
- 4.3 AAT staff and representatives must not:
- 4.3.1 overlook or allow bullying, violations of this policy or any form of abuse to go unchallenged;
  - 4.3.2 make promises not to share information;
  - 4.3.3 form emotional or physical relationships with children or adults at risk;
  - 4.3.4 shout or call any person with whom AAT comes into contact through its work insulting names;
  - 4.3.5 engage in physical contact (horseplay) that could be unwelcome or misinterpreted;
  - 4.3.6 allow or engage in inappropriate touching of any kind;
  - 4.3.7 use or allow children or adults at risk to use inappropriate or sexualised language;
  - 4.3.8 harass or pester any person with whom AAT comes into contact with through its work (including colleagues, members and licensees) in any way including in a sexualised or predatory manner;
  - 4.3.9 spend time alone with a child or adult at risk outside the normal training/classroom/assessment environment;
  - 4.3.10 invite a child or adult at risk to stay with them or share a room/sleeping accommodation;
  - 4.3.11 have a child or adult at risk on their own in a vehicle, unless another member of staff or appropriate person is also in the vehicle; or
  - 4.3.12 interact with children or adults at risk through any online platforms (including but not limited to social media apps, messaging apps and games) unless this has been agreed as part of managing collaborative learning.

### **Identifying, recording and reporting allegations of abuse**

- 4.4 **AAT staff or representatives:** If a member of AAT staff or representative witnesses or is made aware by a colleague, member or licensed member of allegation or suspicion of abuse, about a self-study student, colleague, member or licensed member of AAT staff or representative should take the following steps:
- 4.4.1 Listen carefully to the person making the allegation.
  - 4.4.2 Avoid asking detailed or leading questions, but try to confirm basic information about who, when, where and what, but not why.

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- 4.4.3 Explain to the person making the allegation that:
- they (and AAT) take what they are saying seriously;
  - they cannot keep the information a secret and anything they say will likely need to be shared with others;
  - their report will only be shared on a need-to-know basis.
- 4.4.4 If the person is in immediate danger, act quickly. Call the emergency services if needed, if possible, check with the DSO first.
- 4.4.5 Do not try to rescue or intervene yourself as it may put you and the person at risk. Instead, contact the DSO who can advise or direct to specialist support.
- 4.4.6 Fill out the Safeguarding Incident Report Form (appendix 2). Send it securely to [safeguarding@aat.org.uk](mailto:safeguarding@aat.org.uk) within 24 hours of the staff member being notified of the incident. Failure to report can put the person at risk of further harm.
- 4.4.7 If the DSO is unavailable or conflicted, the staff member should contact the Deputy DSO in the first instance. If the Deputy DSO is not available, contact should be made with the Safeguarding Lead Trustee as a last measure. They will be responsible for managing the initial concern and perform the DSO role.
- 4.4.8 AAT staff members and representatives should not investigate the concern.

#### **AAT approved organisations:**

- 4.5 If you are worried about a student, member of staff or other person who is within an approved organisation you should follow that approved organisation's own safeguarding policy. This includes reporting the concerns to that approved organisation's own Designated Safeguarding Lead.
- 4.6 It is the responsibility of the approved organisation to manage and lead on such a safeguarding concern.
- 4.7 If appropriate, the Designated Safeguarding Lead should share any concerns with AAT where the concern may have a wider impact outside of the approved organisation. This may include where the concern involves students on AAT approved courses in other approved settings and where there is a risk to AAT reputationally.
- 4.8 If the concern relates to an approved AAT person directly involved in the delivery of the AAT qualification, then, in addition to following the approved organisations policy and procedure, the concern should be raised by the approved organisations Designated Safeguarding Lead with AAT by completing the Safeguarding Incident Report Form (Appendix 2) and submitting this securely and confidentially to [safeguarding@aat.org.uk](mailto:safeguarding@aat.org.uk). This report should include, where appropriate, confirmation of action taken by the approved organisation and confirmation of any action to be taken as a result of the concern raised. Where appropriate and within two working days, AAT will acknowledge receipt of the report and seek any clarifications in order to consider any appropriate next steps.

#### **Other third parties connected with AAT:**

- 4.9 If other third parties connected with AAT, such as AAT members or other beneficiaries of AAT experience, witness or have brought to their attention an allegation or suspicion of abuse involving themselves, AAT staff or representatives, they should promptly inform

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AAT by completing the Safeguarding Incident Report Form (Appendix 2) and submitting this securely and confidentially to [safeguarding@aat.org.uk](mailto:safeguarding@aat.org.uk).

- 4.10 Where appropriate, within two working days, AAT will acknowledge receipt of the report, seek any clarifications to consider appropriate next steps. Such steps may include signposting the member or licensee to appropriate services and support, offering support through an investigation (where appropriate) or escalation within AAT internal procedures.

**Confidentiality and onward reporting:**

- 4.11 Confidentiality must be maintained at all stages. Reports must be shared only with the DSO, the Deputy DSO, and the Safeguarding Lead Trustee. Only the DSO, Deputy DSO or Safeguarding Lead Trustee may share information on a limited basis. Any written report and all related documents must be kept confidential and secure. No confidential information is to be stored on personal devices by any persons.
- 4.12 AAT is a registered charity and is obliged to promptly report serious incidents (which include safeguarding incidents) to the Charity Commission. In addition, as a regulated awarding organisation, safeguarding issues that have or are likely to have an adverse effect will be reported to the appropriate qualification regulator<sup>2</sup>.

**DSO responsibilities following an allegation or report**

- 4.13 When the DSO receives a Safeguarding Incident Report Form, or the DSO becomes aware of a safeguarding issue themselves, the DSO will then take the necessary next steps. These steps will follow any advice from the relevant authorities. These steps include:
- 4.14 Clarifying that the subject(s) of the report is/are safe from immediate danger.
- 4.15 Address any gaps in the information provided to the extent that it is appropriate to do so at that stage.
- 4.16 Confirm they are the appropriate person to be leading on the incident. If not, to refer the matter to the Deputy DSO or the Safeguarding Lead at the approved organisation.
- 4.17 Consider whether any referral needs to be made to appropriate agencies and keep this under review.
- 4.18 If a person's wishes are being overridden, check this is appropriate, and the adult understand why. Record the decision making around such a position. This will be in accordance with the governments Information Sharing guidance.
- 4.19 If the report relates to a child/adult at risk, and their family or carer have not been informed, the DSO will decide who should inform the child/adult at risk's family or carer (if appropriate) and when they should be informed, taking advice from relevant authorities as appropriate.
- 4.20 In deciding when to report to local authorities, the alleged victim's best interests will be the overriding consideration and will always be paramount to any perceived loyalty to an alleged abuser, any political or financial expediency or in respect of AAT's reputation. All decisions in this regard must be carefully recorded, with reference to the matters taken

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<sup>2</sup> Qualification regulators include: the Office of Qualifications and Examinations Regulations (Ofqual); the Council for the Curriculum, Examinations and Assessments (CCEA); Qualifications Wales; the Scottish Qualifications Authority (SQA); and the Botswana Qualifications Authority (BQA).

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into account. Such records must be stored securely and kept confidential where appropriate.

- 4.21 All disclosures to external agencies must be undertaken in accordance with the requirements of GDPR and other data protection legislation. It is noted that these requirements are not a barrier to the sharing of information, but a framework within which to do so.
- 4.22 Co-operating appropriately in the sharing of information to any relevant local or international agencies.
- 4.23 To assist in any external agency investigation to the fullest extent permitted by legislation and statutory guidance. If criminal offending is found or suspected, the matter will be escalated to the relevant authorities as a priority.
- 4.24 Carry out any investigations in an objective, transparent manner which is guided by external professional expertise and support when required.
- 4.25 Under no circumstances should AAT undertake an investigation outside the scope of its rights and obligations under the agreements and policies that govern its relationships with third parties. No action should be taken before an initial report is made to the relevant authority (if appropriate per the relevant above) and their advice is sought as to next steps. AAT will fully co-operate with relevant authorities and provide all reasonably practicable assistance during the course of any external authority's investigation, such as it is permitted to share by legislation and statutory guidance. AAT staff and representatives must not do anything which may compromise any authority's investigation but must ensure that any immediate action required to remove a person from harm is sensitively taken.
- 4.26 Where the report does not relate to an AAT approved organisation, the DSO should liaise with the HR team, if necessary, who may advise on whether information needs to be shared with any other member of staff, e.g., in some circumstances the DSO may need to report to the manager of the team where the concern has arisen.
- 4.27 If necessary and appropriate, plan what to say to individuals/organisations connected to AAT and to the media and liaise with any relevant stakeholders as required. It is noted that any external communications should be as open and transparent as possible, while suitably respectful of data privacy.
- 4.28 Report to the Chair of the Board and the Chair of the Audit and Risk Board (Safeguarding Lead Trustee) as appropriate (such as in an anonymised or pseudonymised format, if the context requires), to enable prompt and appropriate reporting of serious incidents to AAT Board, Charity Commission and/or insurers. Any serious incident reports to the Charity Commission will be made by the Company Secretary in consultation with the Chair of the Audit and Risk Board and on behalf of, and copied to, AAT Board.
- 4.29 If the organisation(s) the report concerns is not or is not exclusively AAT, the DSO must, within two working days, inform the relevant organisation's safeguarding officer that an incident has been reported, provide details of the allegation (if appropriate) and, where appropriate, confirm what action has or is being taken.

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## Implementation:

- 4.30 Responsibility for implementing this document, including ensuring that appropriate resources and processes are in place, resides with line managers. Line managers should flag any problem areas that are unable to comply with the principles of this policy with their Executive Team member or a member of the People team. All staff should raise any non-conformities with their line manager for escalation.
- 4.31 Line managers have the responsibility to cascade information on new and revised policies/procedures and other relevant documents to the staff for which they manage and must ensure that departmental systems are in place to enable staff (including contractors and temporary staff) to access relevant policies, procedures, guidelines and protocols and to remain up to date with the content of new and revised policies, procedures, guidelines and protocols.
- 4.32 This policy shall be reviewed regularly at intervals of not more than 12 months (or sooner if new legislation, codes of practice or national standards are introduced) and shall be updated as required to ensure continuing suitability, adequacy and effectiveness.

## 5. Monitoring and audit

- 5.1 The Audit and Risk Committee is responsible for monitoring compliance with all aspects of policies.
- 5.2 If you are aware of any deviations from the policy, or breaches of process, it must be documented and reported to the policy owner and/or Company Secretary at [company.secretary@aat.org.uk](mailto:company.secretary@aat.org.uk) and, where appropriate, with recommendations for corrective actions or improvements.

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## Appendix 1: Safeguarding roles and responsibilities

### **Designated Safeguarding Officer (DSO)**

1. Maintain AAT's Safeguarding policy and associated procedures, ensuring that they are reviewed at least annually, in response to changes in best practice, or following a serious incident.
2. Make arrangements for AAT staff and representatives to receive appropriate training on safeguarding best practice and the interpretation and implementation of AAT's Safeguarding policy.
3. Receive and deal with reports of allegations or suspicions of abuse in accordance with Section 8 of AAT's Safeguarding policy.
4. Provide quarterly updates on the type and volume of safeguarding incidents reported, along with any trends emerging, for consideration by the Audit Board.
5. Implement changes and improvements to AAT's Safeguarding policy, in response to feedback from the Audit Board.
6. Keep up to date on changes to external safeguarding policy and legislation and ensure these are reflected in AAT's approach to safeguarding.

### **Deputy Designated Safeguarding Officer (Deputy DSO)**

1. Support the Designated Safeguarding Officer (DSO) in maintaining AAT's Safeguarding policy and associated procedures.
2. Support the DSO in making arrangements for AAT staff and representatives to receive appropriate training on safeguarding best practice and implementation of AAT's Safeguarding policy.
3. Support the DSO in dealing with reports of allegations or suspicions of abuse in accordance with Section 8 of AAT's Safeguarding Policy, leading on investigations when the DSO is not available or has a conflict of interest in regard to a specific case.
4. Support the DSO in providing quarterly updates to the Audit Board.
5. Support the DSO implement changes and improvements to AAT's Safeguarding policy, in response to feedback from the Audit Board.
6. Keep up to date on changes to external safeguarding policy and legislation and support the DSO in ensuring these are reflected in AAT's approach to safeguarding.

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## **Safeguarding Lead Trustee**

1. Review and agree (with Audit Board consent) AAT's Safeguarding policy and associated procedures, and any subsequent revisions for recommendation to Board for approval.
2. Lead on dealing with reports of allegations or suspicions of abuse in accordance with Section 8 of AAT's Safeguarding Policy, when the DSO and/or Deputy DSO are either not available or have a conflict of interest in regard to a specific case.
3. Review quarterly updates to the Audit Board and make recommendations (with Audit Board consent) for improvements to AAT's Safeguarding policy and associated procedures.
4. Where appropriate and necessary, escalate issues for consideration by Board, including the need to report any issues to the Charity Commission
5. Keep up to date on changes to external safeguarding policy and legislation and offer advice and guidance to the DSO and Deputy DSO on how these changes to impact on AAT's approach to safeguarding.



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## Appendix 2: Safeguarding incident report form

This form should be used to report an allegation or suspicion of abuse that involves person(s) who are taking or delivering AAT qualifications and assessments, or who are connected in some other way to AAT. This may include AAT students and approved organisation staff, AAT members, and AAT staff and representatives.

Please complete as fully as possible and submit securely and confidentially to [safeguarding@aat.org.uk](mailto:safeguarding@aat.org.uk).

Your name	
Your role (i.e., capacity in which you are reporting this incident)	
Your organisation	
Your e-mail address	
Your contact telephone number	
Name of organisation where incident occurred (if different from above)	
<p>Details of allegation or suspicion</p> <p>Please provide as much information as possible, including as appropriate:</p> <ul style="list-style-type: none"><li>• Names and roles of those involved (including the reporter, if not the person immediately concerned)</li><li>• Date of incident</li><li>• Place of incident</li><li>• Nature of abuse</li><li>• Your relationship to the parties involved</li><li>• How you came to have a concern or suspicion, or be aware of the allegation</li><li>• As far as is possible, exactly what was said in the conversation</li></ul>	

Have the police, any regulator or other agency been informed?	Yes		No	
If yes, provide time and date of reporting, person(s) to whom the report was made, and any advice taken				
<b>Declaration</b>				
I confirm that the information included in this form is accurate, to the best of my knowledge				
Name		Date		
<b>Official: To be completed by the DSO</b>				
Action taken (e.g., reports to relevant authorities; parent/carer informed)				
Date reported to Chair of Audit Board – acting as Safeguarding Lead Trustee (if appropriate)				
Note of any decisions made and justifications for these decisions				
Any follow up actions required				

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## Appendix 3: Definitions of ‘domestic abuse’ and ‘personally connected’

### Section 1: Definition of ‘domestic abuse’

1. This section defines ‘domestic abuse’ for the purposes of this Act.
2. Behaviour of a person (A) towards another person (B) is domestic abuse if:
  - a) A and B are each aged 16 or over and are ‘personally connected’ to each other, and
  - b) the behaviour is abusive.
3. Behaviour is ‘abusive’ if it consists of any of the following, and it does not matter whether the behaviour consists of a single incident or a course of conduct:
  - a) physical or sexual abuse;
  - b) violent or threatening behaviour;
  - c) controlling or coercive behaviour;
  - d) economic abuse (see subsection 4);
  - e) psychological, emotional or other abuse.
4. ‘Economic abuse’ means any behaviour that has a substantial adverse effect on B’s ability to:
  - a) acquire, use or maintain money or other property, or
  - b) obtain goods or services.
5. For the purposes of this Act, A’s behaviour may be behaviour ‘towards’ B despite the fact that it consists of conduct directed at another person (for example, B’s child).
6. References in this Act to being abusive towards another person are to be read in accordance with this section.
7. For the meaning of ‘personally connected’, see section 2.

### Section 2: Definition of ‘personally connected’

1. Two people are ‘personally connected’ to each other if any of the following applies:
  - a) they are, or have been, married to each other;
  - b) they are, or have been, civil partners of each other;
  - c) they have agreed to marry one another (whether or not the agreement has been terminated);
  - d) they have entered into a civil partnership agreement (whether or not the agreement has been terminated);
  - e) they are, or have been, in an intimate personal relationship with each other;
  - f) they each have, or there has been a time when they each have had, a parental relationship in relation to the same child (see subsection (2));

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- g) they are relatives.
  - 2. For the purposes of subsection 1 f), a person has a parental relationship in relation to a child if:
    - a) the person is a parent of the child, or;
    - b) the person has parental responsibility for the child.
  - 3. In this section:
    - ‘child’ means a person under the age of 18 years;
    - ‘civil partnership agreement’ has the meaning given by section 73 of the Civil Partnership Act 2004;
    - ‘parental responsibility’ has the same meaning as in the Children Act 1989;
    - ‘relative’ has the meaning given by section 63(1) of the Family Law Act 1996.

### **Section 3: Children as victims of domestic abuse**

- 1. This section applies where the behaviour of a person (‘A’) towards another person (‘B’) is domestic abuse.
- 2. Any reference in this Act to a victim of domestic abuse includes a reference to a child who:
  - a) sees or hears, or experiences the effect of, the abuse, and
  - b) is related to A or B.
- 3. A child is related to a person for the purposes of subsection (2) if –
  - a) the person is a parent of, or has parental responsibility for, the child, or
  - b) the child and the person are relatives.
- 4. In this section:
  - ‘child’ means a person under the age of 18 years;
  - ‘parental responsibility’ has the same meaning as in the Children Act 1989 (see section 3 of that Act);
  - ‘relative’ has the meaning given by section 63(1) of the Family Law Act 1996.