

Introduction

Nviro has a duty to safeguard and to take a proactive, preventative and consistent approach to reduce the risk of harm occurring. This applies to children, vulnerable adults and Nviro colleagues.

We are committed to working with our clients to ensure our colleagues safeguard and promote the welfare of children and vulnerable adults in the workplace by keeping them safe and free from harm. We are committed to equal opportunity for all job applicants and aim to select people for employment based on their skills, abilities, experience, knowledge and, where needed, qualifications and training. We will comply with our legal obligations when recruiting people to work with children and/or vulnerable adults.

The health and well-being of our colleagues is fundamental. Nviro is committed to ensuring that our colleagues are aware of the procedures in place to support and safeguard a vulnerable colleague.

Policy Aim

This policy aims to give guidance on the business's legal obligations when it comes to Safeguarding as well as guidance for our colleagues on how to manage safeguarding risks that they may come into contact with whilst working for Nviro.

Definitions

Child or Children - A child or children is defined as any person under the age of 18 years.

Vulnerable Adult - A vulnerable adult is defined as someone over the age of 18 who has an inability to protect themselves from harm or exploitation. This may be due to reasons such as a disability, learning difficulties, mental health issues, age or illness. A vulnerable adult may be someone attending or staying at one of our client sites, or a work colleague.

Safeguarding Procedures and Code of Conduct

Everyone has a shared responsibility to safeguard and promote the welfare of children and vulnerable adults. This responsibility applies to all colleagues, volunteers, contractors, and anyone working on behalf of Nviro, regardless of their role. Safeguarding is integral to all activities and requires individuals to remain vigilant, recognise signs of abuse or neglect, and take appropriate action to report concerns in line with Nviro's safeguarding procedures. By working together and maintaining a culture of openness and accountability, we aim to ensure a safe, supportive, and protective environment for all children and vulnerable adults.

- Always act in a way that safeguards and promotes the welfare of children and vulnerable adults.
- Treat all children and vulnerable adults with dignity, respect, and fairness.
- Work activities must be planned to minimise contact with children and vulnerable adults wherever possible. Cleaning and similar duties should normally be carried out outside of core operational hours.
- Do not be alone with children or vulnerable adults and avoid unnecessary or unsupervised contact.
- The casual use of company-issued or personal mobile phones on client premises is strictly prohibited. This includes personal calls, messaging, photography, gaming, streaming, and use of social media. Colleagues must comply with the Company [Mobile Phone Policy](#) at all times.

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- Maintain professional boundaries at all times and avoid behaviour that could be misinterpreted or place others at risk.
- Never engage in physical, sexual, or emotionally inappropriate behaviour, including suggestive language or gestures.
- Physical contact with children or vulnerable adults is strictly prohibited.
- Personal information must not be shared with, requested from, or received about children or vulnerable adults without appropriate authorisation. Exceptions may apply where family members are attending the site.
- All Health and Safety procedures must be followed at all times. Cleaning chemicals, equipment, and materials must never be left unattended or accessible to children or vulnerable adults.
- Colleagues must not attend work under the influence of alcohol or drugs, nor bring, use, or supply alcohol or illegal substances on any site. Please refer to the Company [Alcohol and Substance Misuse Policy](#) for further information.
- Cooperate fully with safeguarding investigations and maintain confidentiality at all times.
- Challenge and report poor or unsafe practice, including concerns about the conduct of colleagues.
- Understand that failure to follow this Code of Conduct may result in disciplinary action.

Safe Recruitment

Offers of employment for roles involving work with children or vulnerable adults are conditional on meeting standard employment requirements, including right-to-work verification, and, where required, satisfactory DBS checks. Applicants who refuse to allow a DBS check will be considered as not having completed the recruitment process. Employment cannot commence until all conditions are met. Nviro ensures recruiting managers follow these procedures, and all managers involved in recruitment receive training in safeguarding, recruitment, and identity checks, and must comply with this policy.

- Applicants must attend face-to-face interviews and provide original documents to verify identity.
- All documents are checked via the Trust ID system in line with the Immigration, Asylum and Nationality Act 2006.
- Applicants must declare all convictions, except those spent under the Rehabilitation of Offenders Act 1974; those working in regulated activity or with children must undergo an Enhanced DBS check and declare all convictions, including spent convictions, in line with DBS guidelines. Overseas criminal record checks may be required for applicants with limited UK residence.
- Failure to disclose convictions may result in withdrawal of an offer, dismissal, or rejection of application.
- Nviro complies with client safeguarding requirements; work cannot start until a DBS application is in process, and additional safeguarding measures may be required and must be agreed by the client or Designated Safeguarding Lead. Delays or unsatisfactory checks may result in suspension or termination.
- False information or applications from barred persons will be reported to the DBS and/or police. Employees must notify Nviro of any convictions during employment.

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- All colleagues are subject to a six-month probationary period to assess suitability and provide support.

Nviro will not unfairly discriminate against an applicant on the basis of a conviction, or other details revealed, and a criminal record will not automatically bar them from employment.

Each case will be considered in line with whether the offence has any relevance to the position, the length of time since the offence took place and the circumstances surrounding the offence.

If an applicant, new recruit or existing colleague has a spent or un-spent offence in the following categories, these could be deemed as a risk to the business:

Medium Risk	High Risk
Assault including actual bodily harm. Possession of Class C drugs. Malicious damage and criminal damage. Drink Driving offences. Aggravated speeding offences. Shoplifting and minor theft offences.	Sex Offences. Child Protection issues. Assault including grievous bodily harm. Possession with intent to supply Class A or B drugs. Prison sentences over six months. Repeated offences in the medium category. Affray. Fraud including money laundering. Offences involving weapons. Taking without consent. Theft including handling stolen goods. Trespass with Intent to Steal.

N.B: All offences listed also include the offence of “attempted” as a prefix to the offence.

Not all criminal convictions will be a bar to employment. We will consider the results of a DBS check on an individual basis and will act in a proportionate manner when deciding whether to proceed with the offer of employment. However, the protection and safeguarding of children and vulnerable adults is our primary concern.

Looking after each other

We are committed to looking after our colleagues’ personal wellbeing. Colleagues experiencing a mental health problem, or a serious problem within their personal life, can be reluctant to disclose that they have a condition and that they are suffering, so it is important that line managers and colleagues encourage disclosure in a sensitive way and may direct them to an Nviro Mental Health First Aider who can provide initial support, encouragement and signposting. Mental Health First Aiders will keep all conversations confidential, unless there is a concern that the individual is at risk of harming themselves or others. Where a matter is disclosed by a colleague where they are at risk of abuse or neglect, making them vulnerable and unable to protect themselves, this should be reported to the DSL at Nviro.

Line Manager Responsibilities

Managers are responsible for overseeing safeguarding arrangements and ensuring that all colleagues comply with organisational policies and statutory guidance. Their key responsibilities include:

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- Ensure compliance with Keeping Children Safe in Education and other relevant safeguarding legislation and guidance.
- Oversee safer recruitment processes, including ID verification, DBS checks, and right-to-work checks.
- Identify, assess, and manage safeguarding risks using the Company's safeguarding framework.
- Follow the safeguarding flowchart and ensure colleagues take appropriate and timely action when concerns arise.
- Ensure all staff complete safeguarding training during induction and remain up to date with refresher training.
- Act as a point of escalation for safeguarding concerns, ensuring they are reported to the appropriate Designated Safeguarding Lead or authority where appropriate.
- Consult with colleagues regarding changes that may affect their health, safety, or well-being.
- Promote awareness and access to well-being support, including Mental Health First Aiders and WeCare services.
- Maintain confidentiality in all safeguarding and well-being matters, sharing information only on a need-to-know basis.

SLT Responsibilities

The Senior Leadership Team has overall responsibility for overseeing safeguarding arrangements. The SLT provides strategic leadership, ensures appropriate policies and procedures are in place, and confirms compliance with Keeping Children Safe in Education guidelines.

They ensure that a suitably trained Designated Safeguarding Lead is appointed, that colleagues receive appropriate safeguarding training, and that safer recruitment and vetting processes are implemented. The SLT oversees that work practices minimise contact with children and vulnerable adults, that clear reporting and escalation pathways are followed, and that safeguarding concerns or allegations are managed in line with procedures. Through monitoring, review, and assurance processes, the SLT ensures safeguarding remains effective across the Company.

Reporting Safeguarding Concerns

If a colleague receives a disclosure or has any safeguarding concerns, they must report it using the [Nviro Safeguarding Flowchart.pptx](#), available in the HR Manual and on elementsuite. Under no circumstances should a promise of confidentiality or secrecy be given. A Safeguarding Incident Report should also be completed to support any investigation and maintain a record for future reference; this form is available in the HR Manual. If there is any uncertainty about handling a concern or who it should be reported to, colleagues should contact the HR Department for guidance.

Process for DBS checks

Job applicants will be required to complete an online DBS application with their line manager, where an Enhanced Disclosure is necessary. Nviro uses East Sussex County Council (ESCC) as our umbrella body and countersigns the DBS applications before forwarding them to the Disclosure and Barring Services.

For a Basic Disclosure, a paper DBS form will need to be completed with their line manager.

All colleagues working on a site that requires a DBS will have a new DBS application every three years.

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Safeguarding Training

- All colleagues will be informed of this policy as part of their induction to ensure that anyone who may come into contact with children or vulnerable adults understands the importance of safeguarding and their individual roles and responsibilities.
- Safeguarding training will be delivered during induction and reinforced through annual refresher sessions. These will include toolbox talks for cleaning colleagues and annual e-learning for support colleagues.
- Training will cover how to recognise, and report safeguarding concerns and will equip colleagues with the knowledge and skills required to safeguard children, vulnerable adults, and each other effectively.
- The Company will work collaboratively with customers, liaising with relevant Designated Safeguarding Leads or point of contact where appropriate, to support effective safeguarding arrangements.

All colleagues working on safeguarded sites will be informed of the identity of the Designated Safeguarding Lead (DSL) and the appropriate reporting routes for raising concerns.

Prevent Duty

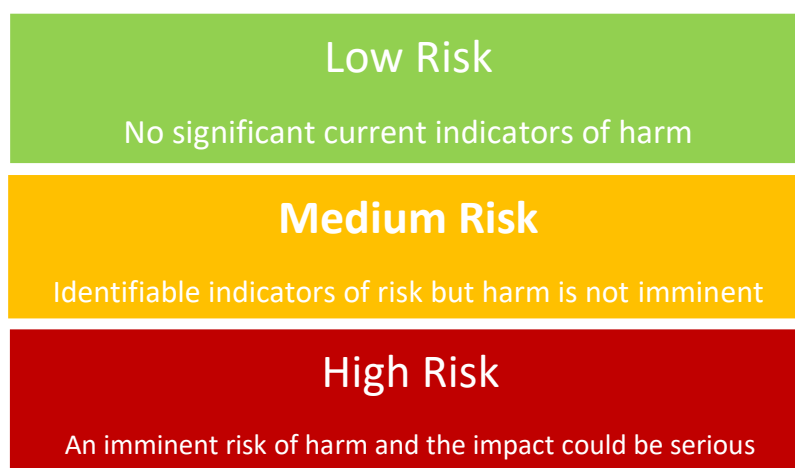
The Counter-terrorism Strategy (CONTEST) 2018 is a strategy developed by the UK government for counterterrorism; the aim of CONTEST is to ‘reduce the risk to the UK and its interests overseas from terrorism so that people can go about their lives freely and with confidence’.

Prevent duty means to have due regard of the need to prevent people from being drawn into terrorism. This includes safeguarding children, young people and adult learners from extremist ideologies and radicalisation.

All colleagues should look out for concerning behaviour that may alert fears of extremist ideologies and/or radicalisation and report them to the Designated Safeguarding Lead (DSL).

Types of Risk

The Risk Assessment Chart made up of risk classifications of Low, Medium and High can be used to help you assess risk to the business and/or make an informed decision on how best to support someone.



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Once a safeguarding risk has been identified, the [Nviro Safeguarding Flowchart.pptx](#) should be followed.

Breach of this policy

Any breach of this policy will be treated as misconduct. The severity—whether minor or gross—will depend on the circumstances. However, the safeguarding of children and vulnerable adults is our primary concern, and any breach relating to safeguarding will be treated very seriously.

Data Protection

All personal data collected during the recruitment process is processed in accordance with the Company's Data Protection Policy and Colleague Privacy Notice. Data collected for safeguarding or recruitment purposes is held securely and accessed only by those managing the process. Where it is necessary to disclose a colleague's personal data to a third party for safeguarding purposes, permission from the colleague(s) will be obtained beforehand.