

# Safeguarding Policy

Webjects Limited – safeguarding children and vulnerable adults

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<b>COMPANY</b>	Webjects Limited (10521644)
<b>VERSION</b>	1.0
<b>ADOPTED</b>	September 2025
<b>REVIEW CYCLE</b>	Annually – each September
<b>NEXT REVIEW</b>	September 2026
<b>APPROVED BY</b>	Chris Gardner, Director
<b>LEGISLATION</b>	Children Act 1989/2004; Care Act 2014

## PURPOSE

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This policy sets out how Webjects Limited ("Webjects", "we") protects children and adults at risk of harm in the course of our work. We are a small web and AI agency, and our role in safeguarding is mostly indirect: we build and host digital services — including websites for schools, councils, charities and other education-sector clients — that may be used by, or on behalf of, children and young people. From time to time our work brings us into contact with children or vulnerable adults, for example when visiting a client's premises or working on a project that involves them.

This policy is honest about our size and our role. We do not run services that put us in regular, direct charge of children or vulnerable adults, and we do not claim a safeguarding apparatus that a two-director company does not have. What we do commit to is taking safeguarding seriously, knowing where our responsibilities begin and end, building digital services safely for younger users, and acting without delay if we ever become aware that a child or adult at risk may be being harmed.

## SCOPE

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This policy applies to:

- The directors of Webjects.
- All associates, contractors and freelancers engaged by Webjects on any project.
- Any work we carry out for clients whose services are used by, or relate to, children, young people or adults at risk — including web design, development, hosting, SEO, branding and AI services.

It covers both face-to-face situations (such as attending a client site where children or vulnerable adults are present) and the digital services we design and build that those groups may use.

Webjects is based in Wales and works across the UK. Where this policy refers to safeguarding duties, the law that applies depends on where the child or adult lives. For Wales, the governing framework is the Social Services and Well-being (Wales) Act 2014; for England, it is the Children Acts 1989 and 2004 and the Care Act 2014. The practical commitments in this policy are the same wherever we work.

## POLICY STATEMENT

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**Our commitment:** Webjects is committed to safeguarding and promoting the welfare of children and adults at risk. The safety and wellbeing of any child or vulnerable adult affected by our work comes before any commercial or project consideration. Everyone working for Webjects has a responsibility to recognise a safeguarding concern and to report it without delay. We will refer serious concerns to the relevant local authority or the police promptly, and we design the digital services we build for younger users with their privacy and best interests in mind.

For the purposes of this policy:

- A **child** is anyone under the age of 18.
- An **adult at risk** is a person aged 18 or over who has needs for care and support, is experiencing or at risk of abuse or neglect, and as a result of those needs is unable to protect themselves. This is the definition used in section 42 of the Care Act 2014 (England) and in section 126 of the Social Services and Well-being (Wales) Act 2014 (Wales); the two are materially the same.

## RESPONSIBILITIES

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WHO	RESPONSIBILITY
<b>The Director (currently Chris Gardner)</b>	Named contact for all safeguarding concerns. Owns this policy, decides when a DBS check is required, makes any referral to a local authority or the police, and keeps a brief, confidential record of any concern raised.
<b>Deputy contact (currently Emily Gardner, Director)</b>	Supports the named contact and deputises for safeguarding matters if the named contact is unavailable.
<b>All associates and contractors</b>	Read and follow this policy. Report any safeguarding concern to the named contact without delay. Do not investigate concerns themselves. Apply privacy-by-design principles on any project involving services likely to be used by children.

The **named contact for safeguarding concerns is the Director (currently Chris Gardner) – info@webjects.co.uk.**

## WHAT THIS MEANS IN PRACTICE

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**Recognising direct contact.** Direct, unsupervised contact between Webjects and children or vulnerable adults is rare. Where a project does involve such contact — for example on-site work at a school or care setting — we agree the arrangements with the client in advance, expect to work under the client's own supervision and safeguarding procedures, and follow them.

**DBS checks.** We recognise that a role meeting the legal definition of *regulated activity* requires an Enhanced DBS check with a check of the appropriate barred list. How that test is met differs for children and for adults:

- For **children**, regulated activity broadly means unsupervised work teaching, caring for, supervising or providing personal care to children on a regular basis — that is, frequently (once a week or more), intensively (on four or more days in a 30-day period), or overnight.
- For **adults**, there is no minimum-frequency test. Regulated activity is defined by the *type* of activity — for example providing personal care, healthcare or certain assistance — so even a single instance can count.

Most of our work does not meet either threshold, because it is technical, off-site, and supervised by the client where it touches their premises. Where a specific engagement does require a check, we will

obtain the appropriate DBS check before that work begins, and we will not place anyone in a regulated activity role without one.

**Online safety and privacy by design.** When we build or host a digital service that is likely to be accessed by people under 18 — whether or not children are the intended audience — we apply the standards of the ICO's Age-Appropriate Design Code (the Children's code), proportionate to the project. In practice this means we advise clients to, and build to:

- set privacy options to high by default;
- collect and keep the minimum personal data needed for the service to work;
- switch off geolocation by default;
- avoid design techniques that nudge children into giving up more data or weakening their privacy settings;
- write any terms, privacy information and published policies in language a young person can understand; and
- treat the best interests of the child as a primary consideration in design decisions.

We document data-protection decisions for these projects in line with our Data Protection Policy and UK GDPR.

**Staying within our role.** We do not run helplines, deliver care, or take on responsibilities that belong to a client's own safeguarding team. Our job is to build safely, behave appropriately on site, and escalate any concern to the right people quickly.

## HOW TO RAISE A CONCERN

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If you are worried that a child or adult at risk is being harmed, is at risk of harm, or you have seen or heard something that worries you in connection with our work:

1. **Act straight away.** Do not wait, and do not try to investigate it yourself.
2. **Tell the named contact** — the Director (currently Chris Gardner), at [info@webjects.co.uk](mailto:info@webjects.co.uk), or by phone if the matter is urgent.
3. **If a child or adult is in immediate danger, call 999** without delay. You do not need to speak to the named contact first in an emergency.
4. **Write down what you saw or heard** as soon as you can — the facts, dates and times — and pass it to the named contact. Keep it confidential.

You can raise a concern in good faith without fear of any negative consequence, even if it later turns out there was nothing wrong.

**Referral of serious concerns.** Where a concern indicates that a child or adult at risk may be being abused or neglected, Webjects — through the named contact — will refer it without delay to the children's or adult social care team at the **relevant local authority** (for Webjects, this is the Vale of Glamorgan Council, or the authority for the area where the person lives), or to the **police**. We will share information with these bodies as needed to keep the person safe, and we will not delay a referral

because we are uncertain whether our concern is well-founded — that judgement is for the safeguarding authorities, not for us.

## CONSEQUENCES OF A BREACH

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Safeguarding is not optional. Failing to report a concern, ignoring this policy, or behaving in a way that puts a child or adult at risk in danger is treated as a serious matter. For directors, associates and contractors this may lead to ending the working relationship or terminating a contract, and — where the law has been broken — referral to the police and the Disclosure and Barring Service. Where a referral to a statutory authority is required, it will always take priority over any internal process.

## MONITORING AND REVIEW

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The named contact keeps a brief, confidential record of any safeguarding concern raised and how it was handled. This policy is reviewed at least once a year, and sooner if the law changes, if our work brings us into more regular contact with children or vulnerable adults, or if a concern shows the policy needs to be improved. Any change is approved by the Director.

## LEGAL FRAMEWORK

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This policy is made under, and should be read alongside, the following UK legislation and guidance. Webjects is based in Wales, so the Welsh framework is the operative one for most of our work; the equivalent England law is included because we also work for clients in England.

- **Social Services and Well-being (Wales) Act 2014** — Part 7 (safeguarding) is the governing framework in Wales, including the duty on relevant partners to report a child or adult they suspect to be at risk, the local authority's duty to make enquiries, and the definition of an adult at risk ([legislation.gov.uk](https://legislation.gov.uk)).
- **Children Act 1989** — the foundation of child protection law in England and Wales, including the welfare duty toward children in need ([legislation.gov.uk](https://legislation.gov.uk)).
- **Children Act 2004** — sections 10 and 11, placing duties on relevant bodies to co-operate and to have regard to the need to safeguard and promote the welfare of children ([legislation.gov.uk](https://legislation.gov.uk)).
- **Care Act 2014** — Part 1, including the section 42 duty on local authorities in England to make safeguarding enquiries for adults at risk, and the statutory definition of an adult at risk ([legislation.gov.uk](https://legislation.gov.uk)).
- **Safeguarding Vulnerable Groups Act 2006** (as amended by the Protection of Freedoms Act 2012) — which defines *regulated activity* with children and with adults and underpins the DBS and barring framework ([legislation.gov.uk](https://legislation.gov.uk)).
- **ICO Age-Appropriate Design Code (the Children's code)** — the statutory code of practice prepared under section 123 of the Data Protection Act 2018 for online services likely to be accessed by children, applied proportionately ([ico.org.uk](https://ico.org.uk)).
- **Disclosure and Barring Service guidance** on regulated activity and DBS eligibility ([gov.uk](https://gov.uk)).

We co-operate with Welsh local authorities and regional safeguarding boards, and with their counterparts in England, in line with these frameworks.

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