



# **Safeguarding and Prevent Policy**

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This policy will be reviewed annually to ensure compliance with legislation and safeguarding best practice.

Version	Notes	Owner
14 (Aug 20)	Refresh of Policy to reflect updated processes, procedure and legislation.	Safeguarding Panel
15 (Oct 20)	Updated to include CURA reporting	Safeguarding Panel
16 (Jan 21)	Updated Record Keeping Section 8 (to align with DPA) and inclusion of legal grounds for processing. Removal of Appendix 5 – Reporting Form Fields Change Appendix 6 to Appendix 5 – COVID-19 and Safeguarding - updated content	Safeguarding Panel
17 (Feb 21)	Addition of Coercive Control (underpinning Domestic Abuse) – see linked Annex 1 Safeguarding Glossary Removal of Vulnerable Adults and Replaced with adults at risk. Updates to Section 5 – E-Safety Reorganisation of Policy Headers	Safeguarding Panel
17.1 (Mar 21)	Correction of Whistleblowing telephone number and refresh link to policy	Safeguarding Panel
18 (18/08/21)	Updating peer-on-peer Harmful sexual behaviours following Consultation	Safeguarding Panel
19 (Oct 21)	Amended policy; removed procedures to create a new document (insert link)	Safeguarding Panel
20 (Dec 21)	Addition of the GC Subcontractor Safeguarding Reporting Procedure link	Safeguarding Panel
21 (Feb 22)	Changed references to “peer-on-peer abuse” in the Safeguarding Glossary to “peer-on-peer/child-on-child abuse” in line with NSPCC guidance	Safeguarding Panel
22 (May 23)	Annual Review Updated terminology from staff to colleagues Added link to Management Portal for safer recruitment guidance. Added information regarding social media checks. Added link to DBS Policy Included BSBF to scope of the policy. Removal of ETF Prevent link. Updated training offer	Safeguarding Panel
23 (July 24)	Updated Training Offer – Included “L2 Understanding Safeguarding, Level 3 DSO and Professional Boundaries training” Appendix 1 – Signs and Symptoms of Abuse and How to Report.	Safeguarding Panel
24 (July 25)	Removed Home Office Prevent Training Link as now included in Level 2 Understanding Safeguarding & Prevent Course. Updated “Radicalisation & Extremism to reflect Level 2 Understanding Prevent & Safeguarding qualification	Safeguarding Panel

## Policy Statement

The Growth Company (GC) has a responsibility to promote the welfare of all our colleagues and participants to keep them safe. We are committed to this and expect all colleagues, volunteers and partners to endorse and practice this commitment at all times. Everyone working for GC has a responsibility to familiarise themselves with this safeguarding policy and procedure.

## Equal Rights to Protection

GC believes that all young people and adults at risk should never experience abuse of any kind and should be protected from unlawful discrimination by the Equality Act 2010 in relation to the 9 protected characteristic groups:

- Race
- Age
- Sex
- Gender reassignment
- Marital or civil partnership status
- Pregnancy and maternity
- Disability
- Sexual orientation
- Religion and Belief

## Intent

GC aims to provide a welcoming, safe, and healthy working and learning environments for all by bringing together the principles of good health, safety, safeguarding, wellbeing and equality and diversity practice. We aim to do this by:

- **Prevention** - providing a safe environment for people to learn and work in including safer colleague recruitment, policies, procedures, colleague training, participant awareness, building resilience, teaching, and pastoral support for all participants.
- **Protection** - identifying young people (under age 18) and adults at risk of suffering, or likely to suffer, significant harm by, for example, abuse of any kind including bullying and radicalisation.
- **Support** - taking appropriate action to see that people are kept safe, both at home, in work and at our centres by working in partnership with parents, carers and external agencies in promoting welfare.

## Definitions

For the purposes of this policy and procedure children are defined in the Children Act (1989) as persons under the age of 18 years. The fact that the person has reached 16 years of age, is living independently, employed or is in further education does not change their status or entitlements to services or protection.

In relation to vulnerable adults, GC defines this in line with the Care Act (2014) as adults at risk. The definition was extended for safeguarding purposes from someone 'who is or may need community care services' to an adult who:

- Has needs for care and support (whether or not the local authority is meeting any of those needs)
- Is experiencing, or is at risk of, abuse or neglect; and

- As a result of those needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

We (GC) refer to participants as:

- Any individual who accesses services or programmes via GC or any of its associated delivery subcontractors.
  - Any child or adult accessing our services.
- These participants may access a range of services and/or learning programmes.

We refer to colleagues as:

- Any colleague, volunteer, or associate working with or delivering GC services.
  - These may be teaching colleagues, key workers, advisers, programme leaders or subcontractor colleagues.

### Safer Recruitment and Colleague Allegations

GC operates safer recruitment practice and offer Safer Recruitment Guidance owned by our HR department which specifically covers colleague recruitment policy and practice, available in the [Management Portal](#).

GC meet statutory requirements in relation to Disclosure & Barring Service, as per the [DBS Policy](#) owned by HR. All colleagues who work within the group who meet the 'regulated activity test' (Freedoms Act 2012) is required to undergo an enhanced DBS check prior to employment.

Further checks are made every three years.

Some roles will also require a barred list check being completed for roles with children and adults at risk. Recruiting Managers will need to ensure that they have familiarised themselves with the Safer Recruitment Guidance to ensure the supervisory arrangements in place are suitable. A central register is maintained by the HR Department.

Until confirmation of clearance is given by DBS, recruiting managers are required to have appropriate supervisory arrangements in place at all times to ensure that our Safeguarding responsibilities are met.

In addition, as mentioned within the Safer Recruitment Guidance and pre-employment checks, GC Education and Skills require for certain roles within the organisation that Social Media checks are undertaken; and is a statutory requirement for schools, colleges and providers of further education, as set out in the KCSIE (Keeping children safe in education) 2022 guidance. The social media check will be completed by a third-party provider and GC will receive a report which will indicate if any content is deemed a risk. The Social Media Check combines sophisticated search technology with human researchers and complex calculations to ascertain an individual's profile results. The results are then reviewed by a human researcher who answers a series of structured questions about what they see online about the individual being researched, they are able to read context and scenario in a way that a computer or data mining tool cannot. With no space for subjective or opinion led answers, as well as zero weighting given to protected characteristics, a series of calculations are developed that result in the final Online Social Profile.

## Colleague Training

All GC *BSBF* and *Employment* colleagues are required to undertake safeguarding training.

- Mandatory online awareness courses at induction i.e., Safeguarding, Equality, Professional Boundaries and Prevent training
- Mandatory Safeguarding Induction (Level 2 Understanding Safeguarding & Prevent)
- Online refresher training for all colleagues annually
- Approved external courses and CPD as agreed by the Safeguarding Panel
- DSO Induction Training (Level 3 Designated Safeguarding Officer Training)
- L2 or equivalent training and attendance ad-hoc CPD sessions for all DSOs

Access to [CURA](#) The CURA system is the primary reporting mechanism for Safeguarding Concerns and Disclosures in GC.

## Radicalisation and Extremism

Preventing radicalisation is part GC's safeguarding duty. It is every colleague's responsibility to respond appropriately where behaviours are challenging and inappropriate. It is recognised that some colleagues require support and encouragement to develop and use the skills required to challenge appropriately. GC ensure all colleagues undertake the Level 2 Understanding Prevent and Safeguarding Qualification to ensure understanding of PREVENT as a mandatory requirement for *Employment and BSBF*.

## Subcontractor Requirements

The GC Safeguarding Policy & Procedures are shared with all Supply Chain Partners (SCPs) as an example of good practice, together with key GC contacts. Suppliers' Safeguarding Policies and Procedures, colleague training, DBS records and Safeguarding reports are a mandatory element of procurement and are checked during due diligence monitoring reviews and included in monitoring reviews. Support is offered to SCPs in the absence of an effective policy or procedure and Safeguarding and Prevent refresher training, where needed, is provided. All subcontractors have access to our dedicated Safeguarding Panel and Designated Officers for advice, if required. Safeguarding reporting in line with the reporting procedure is mandatory; all disclosures and/or concerns must be reported to the relevant Operational team who, in turn, share them with our Safeguarding Panel for central monitoring and satisfactory closure.

## Appendix 1

### Signs of abuse and neglect

Signs that someone might be being abused include:

- changes in their behaviour, like becoming quieter, angrier or more aggressive
- becoming more tearful or depressed
- not wanting to be left by themselves or alone with a particular person
- being unusually light-hearted or saying nothing's wrong
- looking untidy or dirty – for example, having dirty fingernails or bad hygiene
- bruises, wounds or injuries which are not being treated
- the same injuries happening more than once
- the person's home being colder or more untidy than usual
- the person being more isolated from family and friends than usual
- changes to their finances, like having less money than usual.

### Barriers to someone telling you about abuse

It's also important to recognise the barriers which might stop someone from reporting abuse. These can include:

- being afraid of the abuser and what they might do
- being worried about what will happen to the abuser
- feeling embarrassed, ashamed or scared
- being worried about anyone who's dependant on them, like children or pets
- not knowing who to talk to or who to trust
- having bad experiences with reporting things in the past
- not thinking the person's behaviour counts as abuse
- pressure not to report it from family, or other people close to them
- fear of losing contact with the abuser or with other people.

### Reporting abuse and neglect

If you're worried that a participant is being abused or at risk, it's important to act as soon as possible. It's everyone's responsibility to report signs of abuse – do not assume another professional will do something.

If you suspect abuse and the person is in immediate danger, telephone **999**.

If the person is not in immediate danger, you should report the abuse to your organisation's safeguarding lead or your line manager. Follow the safeguarding policy and the policy for sharing information about participants. Log the safeguarding concerns on CURA. Ask your manager if you do not know how to do this, or do not know where to find the safeguarding policy.

If it's safe to do so, speak to the person about your concerns first. You should only do this if you're trained to do so. If you think having a conversation with the person might put them in danger, speak to your line manager or safeguarding lead first. And if you're unsure what to do, speak to someone with more experience.



The  
Growth  
Company