

Safeguarding and Prevent Policy

Contents

1 Introduction	3
Policy Statement	3
Equal Rights to Protection	3
Intent	4
GC Values	4
Definitions	4
2 Roles, Responsibilities and Accountability	5
Safeguarding Action Group	6
Safeguarding for Participants	7
3 Reporting and Recording	7
Whistleblowing	7
National Citizen Service Trust Whistleblowing Procedure	7
Reporting Flowchart	8
National Citizen Service	9
4 Safer Recruitment and Staff Allegations	9
Staff Training	10
Allegations Against Staff and Volunteers	10
The Difference Between an Allegation and a Concern	11
Reporting to DBS	11
5 E-Safety	11
Indecent Images and Online Grooming	12
6 Physical Security & Safeguarding	13
Office and Premises Security	13
External Speakers	13
7 Radicalisation & Extremism	13
8 Subcontractor Requirements	13
9 Record Keeping and Data Processing	14
10 Information Sharing and Referral	14
11 Key Contacts	15
Appendix 1: Safeguarding Glossary	15
Appendix 2: The Legislative Framework	15
Appendix 2a – Linked GC Policies	16
Appendix 2b - Linked National Citizen Service Policies and Procedures	16

Appendix 3: Safeguarding Code of Conduct for Staff	17
Appendix 4: Guidance for Handling a Disclosure	18
Appendix 4a: The 7 Golden Rules of Information Sharing	19
Appendix 5: COVID-19 & Safeguarding	21

Version	Notes	Owner
14 (Aug 20)	Complete 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

1 Introduction

Policy Statement

The Growth Company (GC) has a responsibility to promote the welfare of all our staff and participants to keep them safe. We are committed to this and expect all staff, volunteers and partners to endorse and practice this commitment at all times.

We will seek to keep our participants and staff safe by:

- valuing them, listening to and respecting them
- maintaining and supporting the Safeguarding Panel and Designated Safeguarding Officers
- promoting a culture of Safeguarding and Equality, Diversity and Inclusion by embedding British Values into the curriculum, IAG and wider services and preparing participants for life in modern Britain
- ensuring all staff receive appropriate training and update sessions
- recognising that certain participants (e.g. young people and adults at risk) may be at a greater risk of harm including radicalisation or being drawn into terrorism and taking steps to identify and support them
- implementing an effective e-safety policy and procedure and guidance
- using our procedures to share concerns and relevant information with agencies such as the Local Authority Designated Officer (LADO), the Police, local authority children's social care services or other relevant external agency, parents, families and carers appropriately with the involvement of the participant, via the reporting procedure
- contributing to pre-existing external plans that are in place that help reduce the risk of harm or actual harm and regularly review these with relevant agencies, as appropriate
- adopting a zero-tolerance approach to bullying and ensuring our procedure is effective in dealing with any bullying that does arise
- ensuring that we have effective whistleblowing procedures in place
- ensuring that we provide a safe physical environment for all, by applying health and safety measures in accordance with the law and regulatory guidance
- reviewing this policy and associated procedure at least annually to ensure compliance with legislation and safeguarding best practice

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 environment 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 staff recruitment, policies, procedures, staff 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.

GC Values

The GC approach to Safeguarding aligns with our organisational values and our practices are underpinned by these core principles:

- Make a positive difference: We're proud to make a positive difference to the businesses, communities and individuals that we work with.
- Stronger together: We achieve more by working together.
- Empower people: We encourage ambition and challenge assumptions.
- Do the right thing: We always aim to do the right thing for the right reason.
- Build on success: We learn from our experiences to enable continual growth.

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 staff as:

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

2 Roles, Responsibilities and Accountability

Safeguarding is the **responsibility of all staff** at The Growth Company (GC) and the subcontractors we work with.

The CEO of GC, the CG Board and Managing Directors and operational Senior Management Teams are committed to and responsible for ensuring the Safeguarding Policy and objectives are in line with current legislation and statutory guidelines.

Safeguarding arrangements are overseen at the most senior level by the GC Group Board, Workforce Development Advisory Board (WFDAB), GC – Education and Skills Sub-Board and CEO of GC.

The Safeguarding Panel Group comprises of the Quality Director, Head(s) of Quality, the Health and Safety Manager and an HR representative; the Safeguarding Action Group includes the Designated Safeguarding Officers (DSOs).

Operational responsibility rests with the Quality Director for Education & Skills and who works closely with senior managers, sector/operational directors and the DSOs (see [here](#) for current list of DSOs).

The Safeguarding Panel oversee the day to day implementation of the policy and related procedures, staff training requirements and the monitoring of safeguarding reports for statistical purposes, monitoring and satisfactory closure of reported incidents.

Operational managers are responsible for ensuring that all their staff (including agency workers /associates and volunteers) and subcontractor partners are made aware of and comply with this policy and procedures. In addition, they are responsible for:

- capacity and confidence building of all their staff to identify and appropriately handle a wide range of safeguarding issues
- ensuring that appropriate action is agreed and taken to deal with safeguarding issues including reporting all incidents in line with GC safeguarding procedures
- ensuring staff adhere to this Safeguarding Policy and take responsibility for being vigilant and acting quickly and appropriately in the event of any safeguarding concerns
- ensuring that all their staff undertake mandatory training
- promoting our culture of Safeguarding with staff and participants
- ensuring the embedding of safeguarding and British Values into the curriculum and/or service delivery
- ensuring employers who we work alongside, and any subcontractors are made aware of their safeguarding responsibilities

All staff and subcontractor staff:

- have a duty to act to ensure that the welfare of the GC participants is paramount

- have a responsibility to provide a safe environment to access our services
- have a responsibility to report any emerging concerns in line with the reporting procedure.
- should promote safeguarding
- must report any change in their personal circumstances (for example the committing of an offence) that may call into question their suitability to work with children and adults at risk.
- must undertake relevant Safeguarding and Prevent training
- report any participants who go are missing from programmes and fail to make contact, so that appropriate welfare checks can be made.

It is not the responsibility of GC staff, the board, volunteers or subcontractors to determine whether abuse or harm has taken place; however, it is their responsibility to report any concerns, no matter how minor, regarding abuse or harm via the reporting procedure.

Name	Title	Safeguarding Panel	Safeguarding Role
Helen Stevenson-Miller	Quality Director (E&S)	Yes	DSL
Hannah Marchbank	Learning Support Manager (E&S)	Yes	Deputy DSL
Rosie Wright	Quality Manager (Emp)	Yes	Lead DSO
Cheryl Collins	Head of Quality & Compliance (Emp)	Yes	Deputy DSL (Employment Lead)

This Policy will be reviewed on an annual basis by the Safeguarding Steering Panel to ensure that it reflects best practice and current legislation and guidance. We will consult more widely with external partners and stakeholders, as appropriate and report back to the GC Education & Skills Sub-Board.

The SMT will ensure that safeguarding is included in the HS10 risk assessment which is undertaken before participants are placed with an employer (for an apprenticeship or work placement) and that remedial actions logged and monitored. This is reviewed at performance monitoring meetings and any issues and action points recorded.

Safeguarding Action Group

The Safeguarding Action Group comprises the Safeguarding Panel and all designated safeguarding officers (DSOs) with representatives from supporting cross-GC services such as Health & Safety and HR. The Action Group meets at least quarterly via MS Teams to:

- review and monitor the effectiveness of safeguarding strategy, changes to legislation/guidance, policy and procedures, discuss patterns and trends and reported incidents and outcomes
- promote, share and support effective safeguarding practice
- discuss national policy and practice development, as well as feedback from relevant serious case reviews
- monitor and evaluate safeguarding training
- disseminate feedback from meetings to managers and teams as appropriate

In addition, monthly debrief sessions are in place for DSOs to discuss their cases actions and their own feelings and mechanisms for coping with and managing Safeguarding disclosures and incidents.

Safeguarding for Participants

All participants are provided with information about safeguarding during the induction to their services. This includes key contacts and what to do if they have a concern. The Safeguarding Panel and DSOs also carry out 'walk throughs' at our centres and offices where there is an opportunity to discuss safeguarding with participants, this is undertaken in Education & Skills via the 'Deep Dives.' Performance observations undertaken by management also record any safeguarding concerns.

3 Reporting and Recording

The sections below details information on how staff should respond to disclosures and concerns and these reporting flow charts are available as [standalone documents](#).

Whistleblowing

GC has a Whistleblowing Policy, which all employees must be aware of and follow. A designated Whistleblowing Officer deals with any concerns raised by a GC employee, subcontractor, participant or member of the public. Such investigations can include safeguarding concerns, health and safety risks, potential environmental problems, fraud, corruption, for example.

Concerns can be reported confidentially in a number of ways including:

- E-mail your concerns to Whistleblowing@growthco.uk
- Report by telephone: Internal Audit on 07789961216
- Group CEO on 0161 245 4786

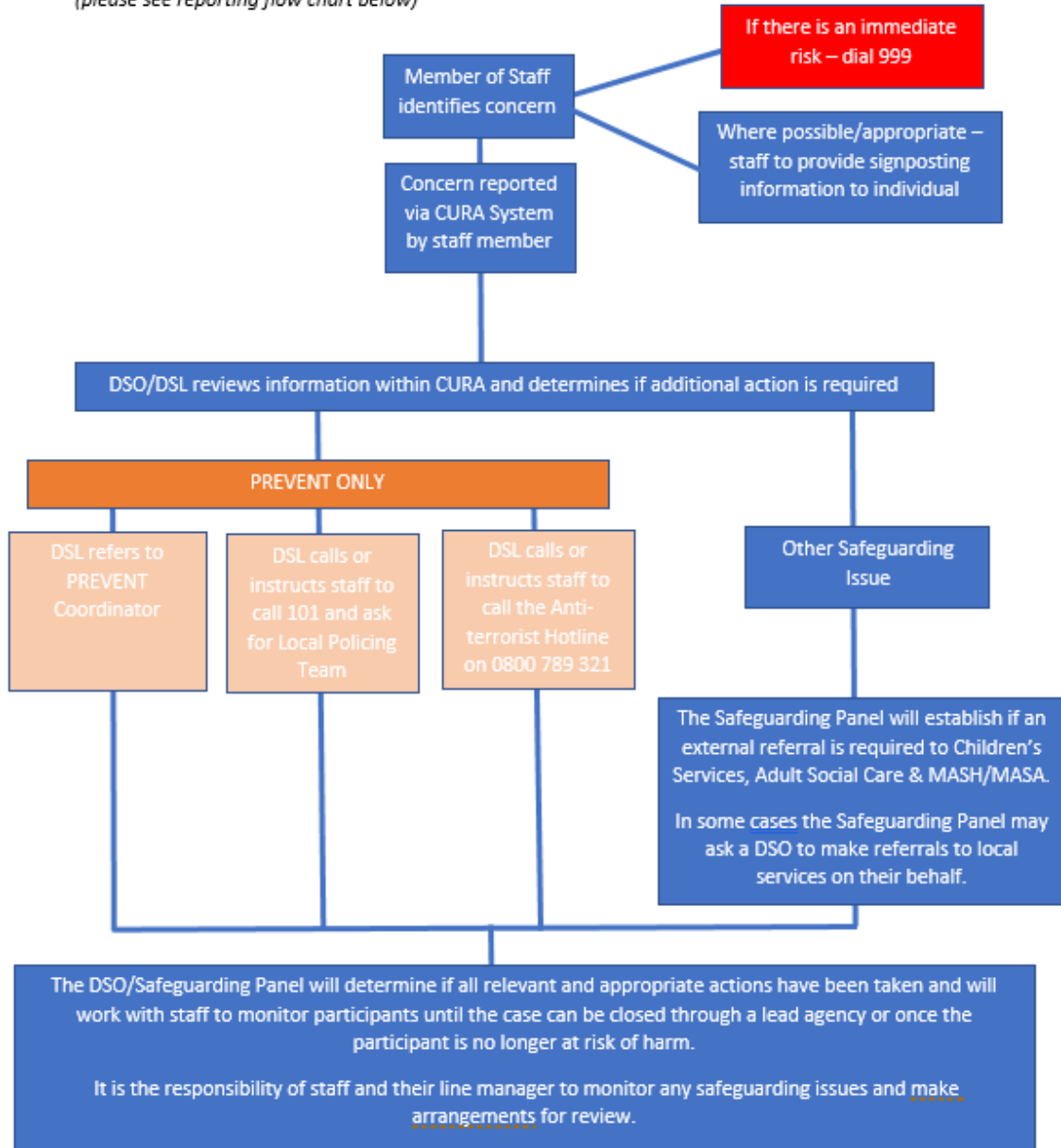
National Citizen Service Trust Whistleblowing Procedure

The NCS Trust 'Speak Up' helpline and accompanying email account enables the reporting of all issues or concerns that relate to NCS and its delivery. All calls and emails will be received directly by NCS Trust and will respect the reporting party's right to anonymity.

- Report by telephone: 0800 9806 899
- E-mail your concerns to confidential@ncstrust.co.uk

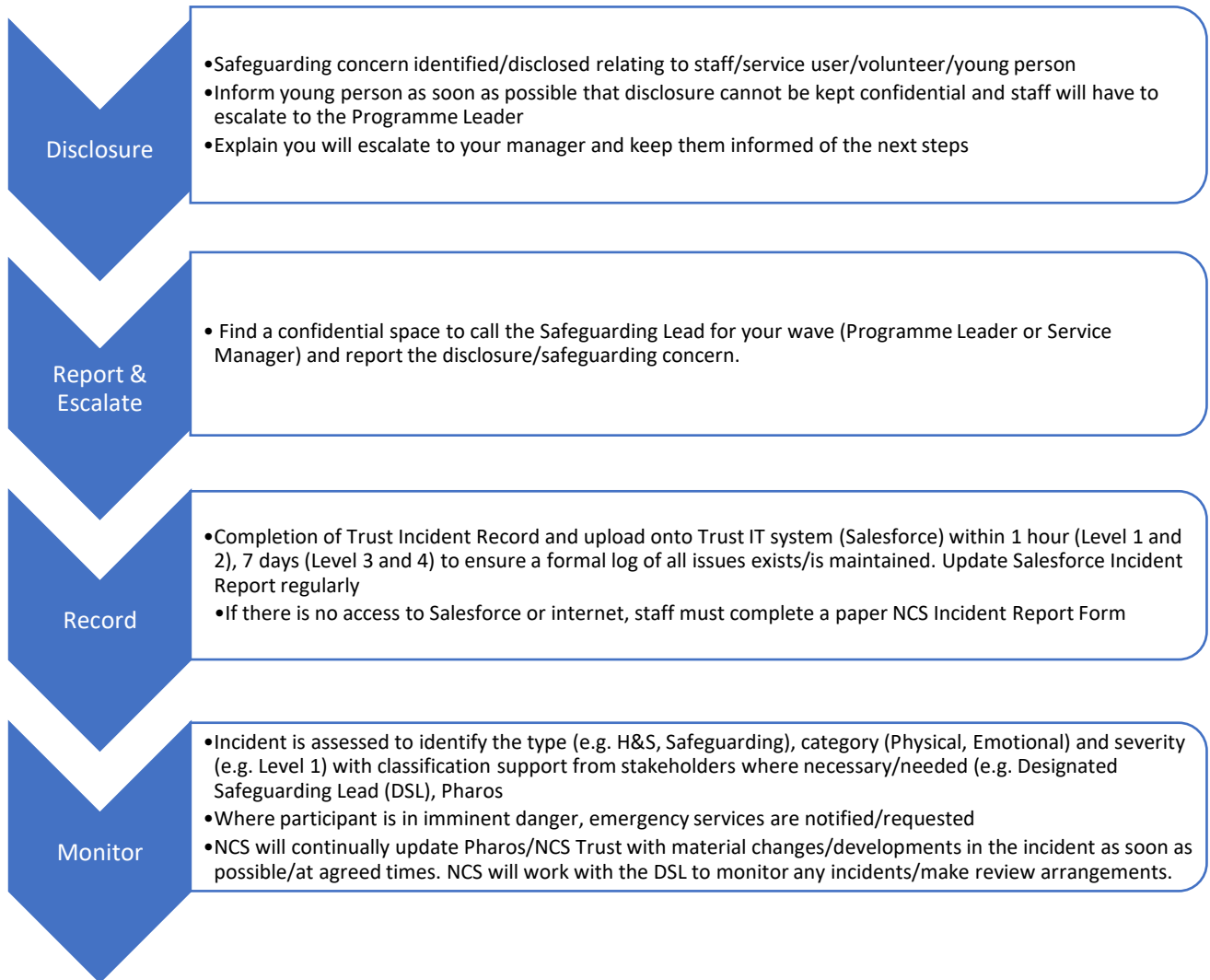
Reporting Flowchart – target to action within 1 working day

Please note that this procedure **DOES NOT** apply for those working within the National Citizen Service (please see reporting flow chart below)



The CURA system is the primary reporting mechanism for Safeguarding Concerns and Disclosures in GC. For information on how to use the CURA system – please see the following resources on the [Safeguarding SharePoint](#).

National Citizen Service - Responding, reporting and recording concerns and incidents



4 Safer Recruitment and Staff Allegations

GC has a Safer Recruitment Policy owned by our HR department which specifically covers staff recruitment policy and practice.

GC meet statutory requirements in relation to Disclosure & Barring Service. All staff 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 Policy 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.

Staff Training

All *GC Education & Skills* and *Employment* staff are required to undertake safeguarding training;

- Mandatory online awareness courses at induction i.e. Safeguarding, Equality and Prevent training
- Online refresher training for all staff annually
- Prevent Training for all staff
 - <https://www.elearning.prevent.homeoffice.gov.uk/edu/screen1.html>
 - <https://preventforandtraining.org.uk/>
- Approved external courses and CPD as agreed by the Safeguarding Panel
- L2 or equivalent training and attendance at themed workshops for all DSOs
- Access to [safeguarding resources](#).

Allegations Against Staff and Volunteers

Despite all efforts to recruit safely there will be occasions when allegations are made of abuse by staff or volunteers. It is the responsibility of the DSO to report allegations to the Safeguarding Panel who will liaise with, the Local Authority Designated Officer (LADO), as necessary and according to local safeguarding procedures. The LADO has the responsibility to manage and have oversight of allegations against people who work with children and adults at risk.

These procedures should be applied when there is an allegation that any person who works with children or adults at risk, in connection with their employment or voluntary activity, has:

- Behaved in a way that has harmed or may harm, or indicates they may pose a risk of harm to a child or adult at risk;
- Possibly committed a criminal offence against or related to a child or adult at risk;
- Allegations can be made in relation to physical and mental harm but can also relate to inappropriate relationships between members of staff and children or young people, for example:
 - Having a sexual relationship with a child under 18 if in a position of trust in respect of that child, even if consensual (see s16-19 Sexual Offences Act 2003);
 - 'Grooming', i.e. meeting a child under 16 with intent to commit a relevant offence (see s15 Sexual Offences Act 2003);
 - Other 'grooming' behaviour giving rise to concerns of a broader child protection nature e.g. inappropriate text / e-mail messages or images, gifts, socialising etc;
 - Possession of indecent photographs / pseudo-photographs of children.

In addition, these procedures should be applied when there is an allegation that any person who works with children or adults at risk:

- Has behaved in a way in their personal life that raises safeguarding concerns. These concerns do not have to directly relate to a child but could, for example, include arrest for possession of a weapon;
- As a parent or carer, has become subject to child protection procedures;
- Is closely associated with someone in their personal lives (e.g. partner, member of the family or other household member) who may present a risk of harm to child/ren for whom the member of staff is responsible in their employment/volunteering.

The procedures for dealing with allegations need to be applied with common sense and judgement. Many cases may well either not meet the criteria set out above or may do so without warranting consideration of either a police investigation or enquiries by local authority children's social care services. *Please note that all NCS channel and LADO referrals **must be** made through the NCS Designated Safeguarding Lead for NCS Direct Delivery.*

The Difference Between an Allegation and a Concern

It might not be clear whether an incident constitutes an 'allegation'. In relation to an allegation the alleged incident has to be sufficiently serious as to suggest that **harm has or may have been caused** harm to a child/ren or adult at risk or that the **alleged behaviour indicates the individual may pose a risk** of harm (or otherwise meet the criteria above). Issues that do not meet this threshold may constitute conduct or disciplinary issues and should be addressed by the normal disciplinary method.

Managing Allegations

The Safeguarding Panel working with HR will report the allegation to the LADO.

The purpose of an initial discussion is for the employer and LADO to consider the nature, content and context of the allegation and agree a course of action. The LADO will ask the employer to provide or obtain relevant information, such as previous history, whether the child, individual or the family have made similar allegations and the individual's current contact with any children or adults at risk.

There could be a police investigation of a possible criminal offence. The employer should not ask the employee any questions that will interfere with any criminal investigation until it has been agreed by LADO and police. The employer will then need to consider disciplinary action (including suspension) in line with the Disciplinary Procedure.

Reporting to DBS

As an employer of staff in a 'regulated activity' GC also has a responsibility to refer concerns to the DBS in accordance with the Safeguarding Vulnerable Groups Act 2006.

Only the HR Director can make a referral to the DBS for their consideration to be placed on the Barred List.

The person should be referred if they have:

- harmed or poses a risk of harm to a child or adult at risk;
- has satisfied the harm test; or
- has received a caution or conviction for a relevant offence and;
- the person they're referring is, has or might in future be working in regulated activity.

5 E-Safety

Participants are provided with guidance for safe use of internet media and social media and the dangers of grooming via chat rooms, instant messaging, mobile phones or text messaging.

[GC Social Media Policy](#) outlines the Code of Conduct for staff.

Photographs of participants without their permission is forbidden and for participants under 16, the permission of parents or carers must be sought.

The GC Photographic Consent form also asks permission before any photographs or video recordings can be used for publicity or display purposes.

Access to the internet or email on computers within GC network are monitored. Internet filtering systems are in place to monitor and safeguard all from accessing inappropriate sites or material; this arrangement is regularly reviewed to maintain the integrity of the system. Any participant who has visited or viewed inappropriate material will fall within the scope of the code of conduct/disciplinary procedure.

Indecent Images and Online Grooming

What to do if a member of staff/volunteer is inadvertently exposed to indecent images of children or young people whilst using the internet

- The URLs (web page addresses) which contain the suspect images should be reported to the Internet Watch Foundation via www.iwf.org.uk by the DSL. You must avoid sending copies of the images to the Internet Watch Foundation;
- Any copies that exist of the image, for example in emails, should be deleted.

What to do if indecent images of children or young people are found on GC devices

- This should be referred to the DSL immediately.
- The DSL will then:
 - Report the URLs (web page addresses) which contain the suspect images to the Internet Watch Foundation via www.iwf.org.uk. They will avoid sending copies of the images to the Internet Watch Foundation;
 - Inform the police and complete the Incident Q&A Form;
 - If any copies need to be stored at the request of the police, then they should be stored securely where no one else has access to them;
 - All other copies must be deleted.

What to do if a member of staff/volunteer is found in possession of indecent images of children or young people on their electronic device provided by GC:

- This should be referred to the DSL immediately.
- They will be aware of their obligations under the Sexual Offences Act 2003 (England and Wales) and the associated Memorandum of Understanding.
- The DSL will then:
 - Contact the police regarding the images. If you are in doubt about whether the images are criminal, then discuss with the police the best way for them to receive copies to determine whether they are criminal or not;
 - Discuss with the police what to do about the device that the images are on;

- Quarantine the device in question and discuss with the police about checking for any other images on that machine;
- Follow the management of allegations procedures including an initial discussion with the police to consider temporary suspension of the member of staff/volunteer pending investigation.

What to do if a child/young person discloses that they are being groomed/abused by someone online

- Follow the procedures as within this policy.
- The DSL should contact the police.
- Advice can be sought from, or if appropriate a report can also be made to, CEOP, the specialist police command dealing with inappropriate online behaviour.
- If the adult is a staff member or volunteer, then also follow the allegations procedures outlined in within this policy.

6 Physical Security & Safeguarding

Office and Premises Security

Visitors are asked to sign in and, where possible, show ID, and are given a visitor's badge confirming they have permission to be on site.

External Speakers

Please refer to the [GC External Speakers Guidelines](#).

7 Radicalisation & Extremism

The Prevent strategy is part of the Governments Counter Terrorism strategy (CONTEST) and it aims to deter people from being drawn into, promotion of or support of terrorism. Where a participant or a member of staff has been identified as being vulnerable or radicalised, GC will refer the individual to Prevent Co-ordinators via the Channel Programme for assessment and support. **This will only be referred by the Safeguarding Panel.**

Preventing radicalisation is part GC's safeguarding duty. It is every staff members responsibility to respond appropriately where behaviours are challenging and inappropriate. It is recognised that some staff require support and encouragement to develop and use the skills required to challenge appropriately. GC ensure all staff undertake the relevant online [Home Office Training for Prevent](#) as a mandatory requirement for *Employment and Education & Skills*.

8 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, staff 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 procedures 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 to be reported to the relevant Operational team who, in turn, share them with our Safeguarding Panel for central monitoring and satisfactory closure.

9 Record Keeping and Data Processing

All records concerning a participant's welfare will be clear, use straightforward language, be concise, accurate in fact and stored confidentially and securely.

Any judgements, interventions or decisions made must be carefully recorded to facilitate further professional judgements to be made should be this be necessary.

Information recorded must be kept confidential by the Safeguarding Panel. GC will retain records of concern, even where there is no need to refer the matter to external agencies. The Safeguarding Panel will monitor reports of safeguarding to determine any trends or patterns and will update the relevant Board and Sub-boards.

Records which are recorded within the CURA system are retained for 10 years following the initial disclosure or concern, in case records are required for Special Case Reviews, the Police or other Agencies.

Data is processed in line with Data Protection and GDPR requirements:

The legal requirement for processing sensitive personal data (section 8) where consent is not expressly provided, is necessary for the safeguarding of children and of individuals at risk;

This condition is met in cases where consent is not appropriate because the individual is under 18 or at risk, but the processing is necessary for reasons of substantial public interest and is to protect them from harm or to protect their well-being.

10 Information Sharing and Referral

It is important to note that, when any suspicions or allegations of harm or abuse have been reported the information obtained may be shared with outside agencies to ensure the safety and welfare of the participant and also to provide the most appropriate care or services needed to protect the individual who may be at risk of harm or abuse.

GC must have due regard to the relevant data protection principles which allow them to share personal information. The GDPR and Data Protection Act 2018 does not prevent, or limit, the sharing of information for the purposes of keeping children and young people safe.

To effectively share information:

- All Designated Safeguarding Officers should be confident of the processing conditions which allow them to store, and share, the information that they need to carry out their safeguarding

role. Information which is relevant to safeguarding will often be data which is considered special category personal data meaning it is sensitive and personal.

- Where there is a need to share special category personal data, they should be aware that the Data Protection Act 2018 includes safeguarding of children and individuals at risk as one of conditions that the sharing of information with others without consent
- Information can be shared legally without consent, if GC is unable to, or cannot be reasonably expected to gain consent from the individual, or if to gain consent could place an individual at risk
- Relevant personal information can also be shared lawfully if it is to keep an individual at risk safe from neglect or physical, emotional or mental harm, or if it is protecting their physical, mental, or emotional well-being.

11 Key Contacts

Please see SharePoint -

<https://manchestergrowthcouk.sharepoint.com/sites/GSHPT/crossgroupworking/safeguarding/Wiki%20Pages/Local%20Authority%20Contacts.aspx>

Anti-Terrorist Hotline - 0800 789 321

www.met.police.uk (To complete a confidential on-line form)

Channel is the safeguarding process for children, young people and adults at risk of being drawn into terrorism or extremism leading to terrorism – referrals are made by the Multi-Agency Safeguarding Hubs/Panels.

Appendix 1: [Safeguarding Glossary](#)

Appendix 2: The Legislative Framework

This policy has been drawn up on the basis of the law and guidance that seeks to protect young people and adults at risk namely (but not exhaustive):

- [Keeping children safe in education – for schools and colleges: statutory guidance for schools and colleges](#) (DfE, June 2020) **from 1st September 2020**

It's crucial **all staff** are familiar with the contents of Part 1 and, where appropriate, Annex A.

The guidance is clear that “all staff read at least Part one of this guidance”. It's important to note that we do not just read the document, the guidance also stipulates that there is a requirement leaders “should ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part one of this guidance.”

- [The Children Act](#) and ‘[Every Child Matters](#)’ (1989 and 2003)
- [UN Convention on the Rights of the Child](#) (1989)
- [Safeguarding Vulnerable Groups Act](#) (2006)
- [Working Together to Safeguard Children – statutory framework](#) (July 2018)
- Ofsted – [Further Education and Skills Handbook](#) (WEF - Sept 2019)
- [Inspecting safeguarding in early years, education and skills settings](#) (Sept 2019)
- [Female Genital Mutilation Act](#) (2003)
- [The Equality Act](#) (2010)

- [Protection of Freedoms Act 2012](#)
- [Data Protection Act](#) (2018) (particularly Schedule 8)
- [Modern Slavery Act](#) (2015)
- Section 115(4) of the Police Act (1997)
 - [The Police Act 1997 \(Enhanced Criminal Record Certificates\) \(Protection of Vulnerable Adults\) Regulations 2002](#)
- [The Sexual Offences Act](#) (2003)
- [Safer Practice, Safer Learning](#) (DfE)
- [Care Act](#) (2014)
- [No Secrets: Guidance on developing and implementing multi-agency policies and procedures to protect vulnerable adults from abuse](#) (last updated 2015)
- [The Mental Capacity Act](#) (2005) and [The Mental Capacity \(amendment\) Act](#) (2019)
- [Disclosure and Barring Service](#) (Gov.UK)
- [The Human Rights Act](#) (1998)
- [The Counter Terrorism and Security Act](#) 2015
- [Work Based Learners and the Prevent Statutory Duty](#) DfE 2018
- [CONTEST - the United Kingdom's Strategy for Countering Terrorism](#) (June 2018)
- [The Prevent Duty Guidance for Further Education](#) (updated April 2019)
- [The Channel Duty Guidance](#) (2015)

Appendix 2a – Linked GC Policies

This policy should be read alongside associated GC policies and procedures:

- [GC \(HR\) Recruitment and Selection Procedure](#)
- [GC \(HR\) Safer Recruitment Policy](#)
- [GC Anti-Slavery and Human Trafficking Policy](#)
- [GC Modern Slavery Reporting Procedure](#)
- [GC Whistleblowing Policy](#)
- [GC Bullying and Harassment Policy](#)
- [GC Data Protection and Information Sharing Policy](#)
- [GC Information Handling, Retention & Disposal Procedure](#)
- [GC Safe, Well and Equal Handbook for staff](#)
- [GC Social Media Policy](#)
- Acceptable Use of IT for Learners (*updated Aug 2020*)
- GC Learner Code of Conduct (*updated Aug 2020*)
- [GC Group Health and Safety Policy](#)
- [GC Physical Security Policy](#)
- [GC Equality and Diversity Policy](#)
- [GC Complaints Procedure](#)

Appendix 2b - Linked National Citizen Service Policies and Procedures

This policy should be read alongside associated GC/NCS policies and procedures:

- NCS Drugs, Alcohol and Psychoactive Substances Guidance
- NCS Trans Inclusion Guidance and NCS Trans Inclusion Policy

- NCS CSE Assessment Tool
- NCS Safeguarding Policy and Procedures
- NCS Safeguarding Policy Statement
- NCS Critical Incidents Guidance
- NCS Modern Slavery Policy
- NCS Social Media Policy
- NCS Code of Conduct for YPs
- NCS Compliance Guidance
- NCS Crisis and Incident Reporting Guide
- NCS In-programme H&S Compliance Assessment Framework
- NCS Peer-on-Peer Operational Guidance
- NCS Sexting – Operational Guidance

Appendix 3: Safeguarding Code of Conduct for Staff

The GC Code of Conduct for staff, set out as examples of safe working practice when working with all participants. The GC Learner Code of Conduct (Education & Skills) sets out disciplinary procedures and sanctions for unacceptable behaviours. Expected participant behaviours posters are displayed in all centres and, as good practice, staff are encouraged to provide Ground Rules in sessions.

Guidelines

Staff should avoid the following situations:

- Sharing personal information and/or providing participants with their own personal contact details
- Discussing personal details of self or other staff or participants - be aware of being overheard.
- Correspondence being shared of a personal nature via any medium.
- Adopting an on-going support or welfare role, beyond the scope of your job role.
- Photographing, audio recording or filming participants via any medium without clear prior agreed purpose and obtaining or checking consent received.
- Spending time alone with participants, away from others. Meetings with individual participants should, wherever practicable, take place within sight of others. If privacy is needed, then either the door should remain slightly ajar or a room with a glass door or window should be used or inform a member of staff of the meeting.
- Making unnecessary unwarranted physical contact with participants. There may be occasions when physical contact is unavoidable, e.g. medical emergency.
- Offering or providing transport in a private vehicle, however short the journey. Where this is unavoidable (emergency), it should be with the full knowledge and consent of the parents (or guardians/carer), if possible, for those participants aged under 18. A senior member of staff should be made aware of the journey and reason including time and location; in the absence of a senior manager, a member of the Safeguarding team. Wherever possible, another member of staff should accompany the car journey.
- Arranging to meet a participant outside of the GC environment or events.
- Showing favouritism to any one participant, nor should they issue or threaten any form of physical punishment.

- Frequent use of terms such as buddy, mate, pal, friend as these may give confusing messages to participants; terms of endearment can also be easily misunderstood
- Giving or loaning personal money or gifts to participants.
- Leaving themselves open to charges of professional misconduct or put themselves at risk of allegations of abuse; never rely on your own name and reputation to protect you from allegations

Staff are asked to:

- Wear their ID Badge at all times whilst in centre or on company business.
- Be aware of their own and other people's vulnerability, maintaining professional
- Familiarise themselves with the Safeguarding procedures for reporting concerns or incidents
- Challenge anti-discriminatory language/jokes.
- Make managers and a member of the Safeguarding team aware, should they find themselves the subject of inappropriate affection or attention from a participant
- Comply with all GC policies and practices including Equality and Diversity, Data Protection and Whistleblowing.

Appendix 4: Guidance for Handling a Disclosure

It takes a lot of courage for an individual to disclose a serious concern such as abuse or harm.

If a participant talks to you about any risks to their safety or wellbeing, you will need to sensitively explain that you may have to share the disclosure and information with the Safeguarding Panel and DSO. GC will, where possible, try to respect the wishes of the individual; however, information may need to be shared with external agencies where it is judged that a person is at risk of suffering significant harm.

If you are approached by a participant wanting to talk, you should listen positively and be supportive:

- Take the disclosure seriously and never dismiss any allegation of abuse.
- Provide a quiet and supportive environment to help the individual feel at ease.
- Allow the individual to speak freely (do not interview)
- Remain calm and don't overreact – they may stop talking if they feel they are upsetting their listener
- Give reassuring nods or verbal acknowledgement
- Never stop an individual who is freely recalling significant events, but don't push them to tell you more than they wish
- Do not jump to conclusions
- Don't be afraid of silence and allow space and time for the individual to disclose.
- Do not prompt the individual in any way or ask any leading questions as this may prejudice the outcome should any allegations go before a court.
- Clarify or repeat back what you think you have heard, if needed, but do not lead the discussion in anyway.
- Use questions such as "Tell me...? Is there anything else?"
- At an appropriate time, tell the individual that in order to help them, you will need to pass the information on (strictly need to know basis); never promise confidentiality
- Do not automatically offer any physical touch as comfort – it may be anything but comforting to someone who has been abused

- Remember professional boundaries
- Avoid admonishing the individual for not disclosing earlier as this may be perceived as meaning they have done something wrong
- Tell them what will happen next in terms of reporting and signposting (if appropriate)
- Reassure them that they have done the right thing in reporting their concerns
- Reassure them that confidences will be shared only with those who have to know and that all guidance, advice and support possible will be given. This might include referring the participant to an external specialist agency, where appropriate.

It may not always be appropriate to make notes during a conversation – however you must record the discussion, where possible, directly after the meeting and:

1. Write an account of the conversation, as accurately as possible trying to use the individuals own language, statements and quotes; use their words and record precisely what has been alleged/happened
2. Use the Safeguarding Concern Report Form
3. Be as factual as possible – what did they say happened, when, and to whom (remember other persons may be involved and at risk too).
4. Put the date/time when they spoke to you and the date/time you wrote your record
5. Include the names of any people who are present during the disclosure.
6. A brief description of any injuries, which are visible or alleged.
7. The individuals preferred action.
8. Forward your report via the Safeguarding Reporting Procedure

Remember that it is not for GC staff to decide whether or not a suspicion, allegation or claim is true.

Appendix 4a: The 7 Golden Rules of Information Sharing

1. Remember that the General Data Protection Regulations, Data Protection Act 2018 and human rights laws are not barriers to justified information sharing but provide a framework to ensure that personal information about living individuals is shared appropriately;
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so;
3. Seek advice from other practitioners or your data lead if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible;
4. Where possible share with consent and, where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful reason to do so, such as where safety may be at risk. You will need to base your judgment on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared;

5. Consider safety and well-being: Base your information sharing decisions on considerations of the safety and wellbeing of the individual and others who may be affected by their actions;
6. Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those people who need to have it, is accurate and up to date, is shared in a timely fashion, and is shared securely;
7. Keep a record of your decision and the reasons for it - whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

Appendix 5: COVID-19 & Safeguarding

Despite the emergency nature of the current situation it remains everyone's role to recognise and respond to potential indicators of abuse and neglect. All action should be taken by those with statutory powers to help individuals.

The Safeguarding Panel will support staff and participants regarding new concerns (and referrals as appropriate) as well as maintaining contact with participants yet to return.

The Safeguarding Panel will attend any reviews called by the Local Authority by MS Teams, Skype or other means of social distancing and may call on appropriate members of staff for reports.

Although delivery of services are operating in digital environment and other non-face to face methods, vigilance around risk of abuse and harm needs to remain high.

Information for Safeguarding in virtual context:

- Domestic abuse - During the period of high-level restrictions as a result of COVID - 19, where families are spending more time together, it is important to recognise the heightened risk of domestic abuse.
 - The current Government guidance is to avoid leaving the house as much as possible. Unfortunately, this places some individuals at risk – either of isolation and neglect, or of domestic violence and other forms of abuse. Remember that people are not expected to stay at home during coronavirus if their home is unsafe.
 - If you or someone else is in immediate danger, call 999 and ask for police. Your emergency situation still matters, even during an epidemic!
 - But if you're not in immediate danger, there are many other resources out there:
 - Freephone 24-hour National Domestic Abuse Helpline, run by Refuge on 0808 247 2000, or visit www.nationaldahelpline.org.uk
 - National LGBT+ Domestic Abuse Helpline: 0800 999 5428.
 - Men's Advice Line: 0808 801 0327.
 - Respect helpline (for anyone worried about their own behaviour): 0808 802 0321.
- Mental health – an individual's mental health may suffer significantly during the pandemic
 - Parents' and carer's mental health will also be affected during the pandemic.
 - Look out for signs of increased anxiety and low mood
- Online technology is invaluable for services and programmes of learning to continue, for participants to keep in touch with friends and feel connected with the outside world. But changes in online behaviour can put individuals at risk of online abuse.

Staff delivering programmes online should be receptive to any cues that indicate a safeguarding concern and report these as soon as possible. These cues might include:

- Not being able to speak freely
- Comments or questions about abuse or neglect
- Inadequate supervision of children and young people at home
- The impact of food poverty
- The health status in a family and any caring responsibilities

Online Safety

It is essential that individuals are safeguarded from potentially harmful and inappropriate communications and online material.

Increased time online may increase exposure to:

- online abuse
- cyberbullying
- sexual exploitation
- sexting
- grooming
- radicalisation

Harmful or upsetting content

- reporting harmful online content to the [UK Safer Internet Centre](#)
- getting government advice and trusted resources from [Educate Against Hate](#) on safeguarding from radicalisation, building resilience to extremism, and promoting shared values

Bullying or abuse online

You can:

- get advice on reporting online abuse from the [National Crime Agency's Child Exploitation and Online Protection command](#)
- get advice and support from the [Anti-Bullying Alliance](#)