Safeguarding and Prevent Policy

Contents

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 safter 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 (Feb24)	Addition of Families and Communities Refresh of Safer Recruitment and colleague allegations and Radicalisation and Extremism	Safeguarding panel
24 (Feb 25)	Updated in line with *Working Together 2023/24*, including strengthened multi-agency working and Family Help.	Safeguarding panel
25 (Feb 26)	Refreshed Safer Recruitment, colleague allegations, and Prevent (radicalisation & extremism) content. Added online safety and digital harms updates (AI, deepfakes, grooming). Included guest speaker vetting, lockdown protocols and Martyn's Law compliance. Strengthened adult safeguarding definitions and mental health links.	Safeguarding panel

Policy Statement

The Growth Company (GC) is committed to promoting the welfare, safety and wellbeing of all colleagues, children, young people, apprentices and adult participants. This policy outlines our approach to safeguarding and the Prevent duty. All colleagues, volunteers, partners, and subcontractors are required to adhere to this policy and embed safeguarding.

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 ability, identity, additional vulnerabilities or the nine protected characteristic:

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

We are committed to creating a safe and inclusive environment for all learners, apprentices, and colleagues.

Intent

Safeguarding is at the heart of what we do, it is fundamental in our provision offer and is embedded in organisational leadership, governance and culture. We aim 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 embedding a safeguarding culture within the following three areas:

Prevention

- Safe learning and working environments
- Safer recruitment
- Robust policies, procedures and training
- Learner resilience and awareness
- Pastoral support

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

Children - Defined under the Children Act 1989 as anyone under 18, regardless of employment, education or living arrangements.

Adults at Risk - As defined by the Care Act 2014:

- Adults with care or support needs, who
- Are experiencing or at risk of abuse or neglect, and
- Are unable to protect themselves from harm due to those needs.

Participants - Any individual accessing GC services or programmes.

Colleagues - Employees, volunteers, associates, teaching staff, key workers, advisers and subcontractor colleagues.

Safer Recruitment and Colleague Allegations

GC operates safer recruitment in line with statutory guidance. Key updates for 2024/25 include:

- Social media and online checks for relevant roles
- Pre-interview reference requests "where possible"
- Digital identity verification in line with UK Digital Identity and Attributes Trust Framework
- Annual DBS rechecks every three years for relevant roles
- Clearer documentation outlining how recruitment decisions are made

Managers must ensure appropriate supervision is in place until full clearance is received.
All allegations against colleagues must follow GC procedures and may require referral to the Local Authority Designated Officer (LADO).

Colleague Training

To develop a competent and confident workforce all *GC Education & Skills, BSBF* and *Employment* colleagues are required to undertake safeguarding training.

- Mandatory online awareness courses at induction i.e., Safeguarding, Equality and Prevent training
- Mandatory Safeguarding Induction Workshop
- Online refresher training for all colleagues annually
- Prevent Training for all colleagues annually.
    - https://www.elearning.prevent.homeoffice.gov.uk/edu/screen1.html
- Approved external courses and CPD as agreed by the Safeguarding Panel
- DSO Induction Training
- L2 or equivalent training and attendance ad-hoc CPD sessions for all DSOs
- Training on our Safeguarding reporting system CURA inclusive of regular updates.

Families and Communities

Families and communities are informed about and involved in promoting the safeguarding of children by working together with children, parents, carers and other agencies to ensure we are

promoting children's welfare/wellbeing and ensuring protection. Children are listened to, informed about their rights, participate in decisions affecting them and are taken seriously.

Radicalisation and Extremism

Safeguarding against radicalisation is part of our statutory duty. We ensure:

- All colleagues complete Home Office Prevent e-learning
- Radicalisation risks—including extremist narratives, misogynistic extremism, incel-related ideologies, and online grooming—are included in training and risk assessments
- Clear internal escalation pathways for Prevent concerns
- Prevent referrals are made to local Channel panels when necessary

Subcontractor Requirements

Subcontractors must:

- Provide current safeguarding and Prevent policies
- Supply DBS evidence and training records

Report concerns following GC procedures

- Access GC Safeguarding Panel support where needed
- Comply with due diligence processes and monitoring reviews

Guest Speakers and External Visitors

Safeguarding and Prevent procedures and are briefed on their responsibilities during their engagement. Any concerns arising from a guest speaker session will be escalated in line with safeguarding procedures. In addition, GC maintains lockdown protocols and complies with the requirements of Martyn's Law to enhance preparedness and protect learners, colleagues, and visitors in the event of a security threat. as per safeguarding procedures.

Online Safety and Digital Harms

Online safety is integral to safeguarding. GC recognises emerging digital risks including:

- Artificial intelligence misuse
- Digitally altered imagery
- Grooming via social media or gaming platforms
- Online radicalisation pathways
- Cyberbullying and harassment

We maintain filters, monitoring tools and staff/learner education to reduce risk.

Low Level Concerns

GC supports a culture where all concerns—no matter how small—are reported. Low-level concerns help identify patterns of behaviour that may indicate risk. All concerns are recorded, reviewed and escalated as necessary on our safeguarding platform CURA.

Child-on-Child Abuse

Child-on-child abuse (also called peer-on-peer abuse) refers to any form of physical, sexual, emotional, or financial abuse, coercive behaviour, or exploitation between children. This can include bullying, harmful sexual behaviour, sexual violence or harassment, online abuse, initiation/hazing,

and other behaviours that cause harm. GC is committed to identifying, challenging, and responding promptly to all forms of child-on-child abuse. Colleagues must record and report all concerns immediately so that appropriate safeguarding action can be taken.

Mental Health and Safeguarding

Mental health difficulties may indicate abuse or other safeguarding concerns. Staff must recognise and escalate concerns. GC works with external mental health services, including CAMHS and adult mental health providers, to support learners. WE have specialist Mental health First Aiders and Assist trained staff to support staff, learners and participant in crisis.

Multi-Agency and Family Help (Working Together 2023/24)

In line with Working Together to Safeguard Children (2023/24), GC adopts a strengthened approach to:

- Family Help (replacing Early Help)
- Earlier, collaborative multi-agency intervention
- Shared responsibility for safeguarding across education, health, police and social care
- Improved planning and information sharing

GC works closely with local MASH teams to ensure timely referrals and coordinated support.

The
Growth
Company