



## Policies and Procedures

### GP Strategies Safeguarding & Prevent Policy

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Review Frequency	Annual Review
Prepared by:	Sharron Symon
Authorised by:	David Martin

Signed by:

A handwritten signature in black ink, appearing to read "D. Martin".

David Martin, Vice President

Date: 7.12.21

**It is essential that all staff have access to this policy and confirm in writing that they have read and understand it.**

#### **Senior Safeguarding Manager**

Sharron Symon

#### **Designated Safeguarding Lead (DSL)**

Martin Keightley

#### **Deputy Designated Safeguarding Lead**

Carolyn Bayley

## 1. SCOPE

1.1 At GP Strategies we acknowledge our responsibilities to safeguard and promote the welfare of everyone we come into contact with, particularly children and adults at risk, in accordance with the Children's Act 1989 and the Care Act 2014. This policy applies to all our staff, managers and leaders. It is also shared with the employers we work with and those we subcontract with. It is our aim to make this policy highly visible and accessible, and for this reason we have published this policy on our company website. This policy also addresses how we strive to ensure that our learners who are training for careers in Early Years, Residential Child and Adult Social Care, and Business, receive the highest standards of support and guidance to develop their awareness of the priority safeguarding has in their sector standards and workplace practices.

## 2. STATEMENT OF INTENT

2.1 Our statutory duty is to safeguard and **promote the welfare of our learners** whilst in learning, in work, at home and within their communities. We aim to ensure that our safeguarding practice complies with government guidance and with best practice, including the Children Act 1989 and 2004, the Care Act 2014, Working Together to Safeguard Children 2018, Keeping Children Safe in Education 2021 and the Education and Training (Welfare of Children) Act. We will take a zero-tolerance approach to all types of abuse and encourage all of our staff to take the view that it may happen in our setting.

2.2 We will also seek to keep learners safe by:

- valuing, listening and respecting them;
- appointing Designated Safeguarding Leads and adopting child protection and safeguarding practices through procedures and a Safeguarding Code of Practice for staff;
- developing and implementing an E-safety Policy and procedures;
- providing effective management for staff through supervision, support, training and quality assurance measures;
- recruiting staff safely and ensuring all necessary checks are made;
- recording and storing information professionally and securely;
- sharing and promoting the knowledge, understanding and application of guidance about safeguarding and good practice with children, adults at risk, their families and staff, via leaflets, posters, newsletters and/or one-to-one discussions;
- using our safeguarding procedures to share concerns and relevant information with agencies who need to know, and, where relevant, involving parents, families and carers appropriately;
- creating and maintaining an anti-bullying environment and ensuring that we have a policy and procedure to help us deal effectively with any bullying that does arise;
- ensuring that we have effective complaints and whistleblowing measures in place;
- ensuring that we provide a safe place by applying health and safety measures in accordance with the law and regulatory guidance.

2.3 Safeguarding and promoting the welfare of children is defined in Working Together 2018 as:

- protecting children from maltreatment;
- preventing impairment of children's health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- taking action to enable all children to have the best outcomes.

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2.4 We recognise that some children, including disabled children and adults at risk, can be particularly vulnerable to abuse and we accept the responsibility to take reasonable and appropriate steps to ensure their safety and promote their welfare.

2.5 As part of our Safeguarding and Prevent policy we will:

- promote and prioritise the safety and wellbeing of all learners;
- sustain and grow a positive culture of support, concern and inclusivity within the company so that our safeguarding arrangements flourish and remain highly effective.
- identify those most at risk through their vulnerability or other circumstances and provide targeted support;
- listen to learners and take account of their wishes and feelings;
- make sure that everyone understands their roles and responsibilities in respect of safeguarding, and is provided with appropriate learning opportunities to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns;
- ensure appropriate action is taken in the event of incidents and/or concerns of abuse and support provided to the individual/s who raise or disclose the concern;
- take care that confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored;
- prevent the employment/deployment of unsuitable individuals;
- ensure robust safeguarding arrangements and procedures are in operation.

2.6 The policy and procedures will be widely promoted and are mandatory for everyone involved in GP Strategies. Failure to comply with the policy and procedures will be addressed without delay and may ultimately result in dismissal.

2.7 We take steps to minimise any possibility of abuse or harm occurring, and make sure if a concern, allegation or disclosure arises it is dealt with quickly and appropriately. Good links are maintained with the statutory safeguarding authorities such as the Safeguarding Children's Partnership (SCP) and Safeguarding Adults Partnership (SAP), and if we have significant concerns about the suitability of a member of staff or a volunteer to work with children or young people, we will refer to the Local Area Designated Officer (LADO).

2.8 Everyone within GP Strategies must fully understand and implement the safeguarding policies and procedures relevant to their role. To enable this to happen there is a comprehensive training programme and safeguarding structure that ensures we protect children and adults at risk across the organisation, including work placements and in the wider community.

### **3. LEGAL FRAMEWORK AND GUIDANCE (CHILDREN AND ADULTS)**

Children Act 1989/2004

United Convention of the Rights of a Child 1991

Data Protection Act 1998/2018 (GDPR)

Human Rights Act 1998

Sexual Offences Act 2003

Mental Capacity Act 2005

Safeguarding Vulnerable Groups Act 2006

The Education and Skills Act 2008

Apprenticeship, Skills, Children and Learning Act (2009)

Safeguarding Disabled Children: Practice Guide 2009

Special educational needs and disability (SEND) code of practice: 0 – 25 years

The Equality Act 2010

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Protection of Freedoms Act 2012  
Domestic Violence, Crime and Victims (Amendment) Act 2012  
Children and Families Act 2014  
The Care Act 2014  
Counter Terrorism and Security Act 2015  
Working together to safeguard children (2018)  
Voyeurism (Offences) Act 2019  
Prevent Duty Guidance 2015 (updated 2019)  
Keeping Children Safe in Education 2020 & (January 2021 Post EU exit update)  
Education and Training (Welfare of Children) Act (2021)  
Sexual Violence and Sexual Harassment between children in schools and colleges (2021)

### 4. SAFER RECRUITMENT, SELECTION AND TRAINING

4.1 GP Strategies follows the Government's recommendations for the safer recruitment and employment of staff who work with children and adults at risk. Our Recruitment Policy is the first step towards safeguarding and promoting the welfare of children and young people.

4.2 We will ensure that those involved in the recruitment and employment of staff have received safer recruitment training and that they are fully aware that they have a responsibility to refer to specific bodies if there are concerns regarding an individual

4.3 GP Strategies will keep children and adults at risk safe by:

- thoroughly vetting all staff who work with learners;
- taking proportionate decisions on whether to ask for any checks beyond what is required;
- ensuring any volunteers are appropriately supervised;
- having appropriate procedures in place for appointing staff.

4.4 Safe recruitment and selection procedures help to ensure a safe workforce by deterring and screening out unsuitable individuals.

#### 4.5 Induction for staff

4.5.1 The Senior Management Team have a responsibility to read and understand Part 1 of KCSIE (updated 2021). They are now held ultimately responsible for ensuring that staff comprehend and discharge their roles and responsibilities and should consider "which guidance is most effective" in their organisation. This will give them the opportunity to make sure that any staff with literacy or English as a Second Language have assimilated the statutory guidance.

4.5.2 All new employees will be given an induction programme which will clearly identify the policies and procedures, including the Safeguarding and Prevent Policy, the Code of Practice and KCSiE (updated 2021), which will make clear the expectations that govern how they carry out their roles and responsibilities.

4.5.3 All new staff must complete the certificated module on the Prevent Duty as part of their induction;

#### 4.6 Safeguarding & Child Protection Training.

4.6.1 All training will be carried out in accordance with SCP and SAP guidance. The DSL, DDSL and DSCs attend Level 3 or above safeguarding and child protection training courses every 2 years with relevant safeguarding CPD updates on an annual basis. Other staff will receive safeguarding training at Level 2 every 3 years. Staff who visit learners in early years settings or in services providing residential and home care will receive L3 safeguarding training relevant to that sector.

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4.6.2 All staff will receive high quality, relevant safeguarding and Prevent induction training. The purpose of this induction training is to make sure they understand the GP Strategies' Safeguarding and Prevent Policy and procedures, and that they have up to date knowledge of the safeguarding issues identified in the Part 1 of KCSiE (updated 2021). This includes early identification of children and adults at risk of radicalisation, exploitation (criminal, sexual or otherwise), peer on peer abuse, Female Genital Mutilation (FGM), child mental health, online safety, whistleblowing and staff conduct. This training will enable them to understand and identify signs of abuse and children and adults at risk who may be in need of help.

4.6.3 Further safeguarding and Prevent training covering statutory updates including managing disclosures and specific safeguarding issues is provided to all staff at least annually and as required.

## 5. PROTECTION FROM ABUSE

5.1 Abuse is a form of maltreatment. Somebody may abuse or neglect a person by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or an institutional or community setting by those known to them or, more rarely, by others, for example via the internet. They may be abused by an adult, adults, another child or children (KCSiE 2020).

5.2 All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are causing a problem by reporting abuse, sexual violence or sexual harassment, nor should they be made to feel ashamed that they have reported an incident.

5.3 One of the ways of preventing abuse is being aware and having knowledge of the indicators of different types of abuse in its various forms. Abuse can manifest itself in many different forms including **peer on peer abuse** that may involve bullying (including cyber bullying), gender-based violence/sexual assaults and sharing nudes or semi-nude images/videos.

**Staff should be clear as to the organisation's Safeguarding and Prevent Policy and procedures with regards to peer on peer abuse.**

5.4 Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. Staff can access government guidance as required on the issues listed below via the NSPCC and GOV.UK and other websites.

5.5 Managing allegations against other children (Peer on Peer abuse)

5.5.1 If an allegation is made by a learner about another learner including any abuse in intimate personal relationships, staff must consider whether the disclosure raises safeguarding and child protection concerns. If one learner causes harm to another it may not be abuse. However, children and adults at risk are vulnerable to abuse by their peers. Such abuse will be taken seriously and not dismissed as 'part of growing up'. Additionally, it will be subject to the same child protection procedures as any other form of abuse. **All peer on peer allegations must be referred to the DSL immediately.**

5.6 Reporting concerns, suspicions and allegations

5.6.1 What is a disclosure?

A disclosure is when a person tells you something that has affected them, for example about instances of current or historic abuse.

5.6.2 Any member of staff, who either knows, is told, or strongly suspects any incident of current or historic abuse, has a duty to report the information immediately to the DSL or DDSL. In their absence, the DSC will be informed without delay.

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5.6.3 Some things that may be shared with you include self-harm and physical, sexual or emotional abuse, and you may also notice signs of neglect. There may be a concern about something that has happened online or through social media. Talking about these things may be difficult to hear and tough to deal with. Following these Dos and Don'ts will help you offer the best support possible.

**Do:**

- remain calm, approachable and receptive
- listen carefully, without interrupting
- acknowledge you understand how difficult this may be
- make it clear that you are taking what is said seriously
- reassure them that they have done the right thing in telling you
- let them know that you'll do everything you can to help them
- make a written record of exactly what has been said
- consider what is known about the child/young person's wider context (Contextual Safeguarding).

**Don't:**

- promise confidentiality
- ask leading or probing questions
- investigate
- repeatedly question or ask them to repeat the disclosure
- discuss the disclosure with people who do not need to know
- delay in reporting the disclosure to the Safeguarding team.

5.6.4 It may be that the disclosure does not meet the harm threshold, but even if the report is unsubstantiated, there needs to be recognition that this may be a low level concern and it should be recorded.

### 5.7 To report a concern:

5.7.1 Make a written record of your concern, including the date, time and all relevant details of the young person concerned, others involved and witnesses (if there are any);

- Contact your Designated Safeguarding Lead (DSL) or the Deputy (DDSL) who will inform you of the next actions to take;
- Complete a safeguarding incident form and send to the DSL via the email address [safeguardingreporting@gpstrategies.com](mailto:safeguardingreporting@gpstrategies.com)
- If it is an emergency and the child is at risk of immediate serious harm, inform the police or social services immediately.
- DSL will conduct an accompanied visit to a site where serious safeguarding concerns are reported.

### 5.8 Who to ask for support:

5.8.1 If the allegation or suspicion is about the conduct of a staff member then make sure you inform the DSL of this because these matters are handled slightly differently by the local authority designated officer (LADO).

### 5.9 Local Authority Designated Officer (LADO)

5.9.1 Every local authority nationally will have a LADO and our national Safeguarding Team will liaise with the relevant LADO in each area as necessary. This individual can provide the DSL with guidance following specific cases of concern where an individual has:

- behaved in a way that has harmed a child, or may have harmed them;
- possibly has committed a criminal offence against or related to a child; or behaved towards a child in a way that indicates s/he is unsuitable to work with children/young people.

5.9.2 The LADO will be informed within one working day of all allegations that come to our attention.

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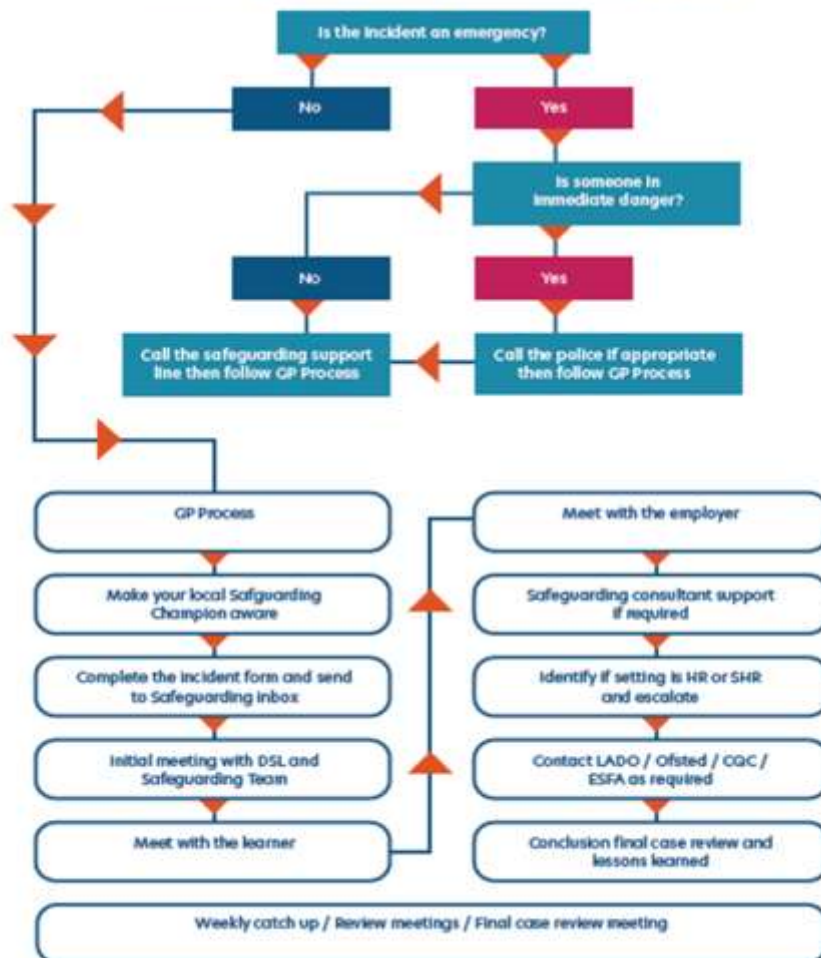
5.10 DBS Referrals

5.10.1 GP Strategies has a legal duty to refer to the Disclosure and Barring Service (DBS):

- anyone who has harmed or poses a risk of harm to a child or adult at risk;
- the member of staff has committed one of a number of listed offences and has been removed from working (paid or unpaid) in regulated activity;
- the member of staff would have been removed for the above had they not left the company.

5.10.2 The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of our staff a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO or other statutory agency.

5.10.3 If there are any changes to their criminal record e.g. driving or other offences, employees are expected to update the organisation immediately. Any failure to disclose an offence, if discovered subsequently, will be/may be treated as a potential act of gross misconduct and could lead to disciplinary action.



### 5.11 Safeguarding Learners with Special Educational Needs and Disabilities

5.11.1 GP Strategies acknowledges that children/young people with special educational needs (SEN) and disabilities can face additional safeguarding risks as they may have an impaired capacity to resist or avoid abuse.

5.11.2 The DSLs will work closely with the **Sector Skills Coaches** to plan support as required. GP Strategies will ensure that children/young people with SEN and disabilities, specifically those with communication difficulties will be supported to ensure that their voice is heard and acted upon.

5.11.3 Members of staff are encouraged to be aware that learners with SEN and disabilities or high needs learners, can be disproportionately impacted by safeguarding concerns, such as bullying and exploitation. All members of staff are encouraged to appropriately explore possible indicators of abuse such as behaviour/mood change or injuries and not to assume that they are related to the learner's disability and be aware that learners with SEN and disabilities may not always outwardly display indicators of abuse. To address these additional challenges, GP Strategies will always consider extra pastoral support for learners with SEN and disabilities.

### 5.12 Gangs, County Lines, Serious violence, Crime and Exploitation

5.12.1 GP Strategies recognises the impact of gangs, county lines, serious violence, crime and exploitation. It is recognised that the initial response to child victims is important and that staff will be proactive with a "it could happen here" approach. They will take any allegation seriously and work in ways that support learners to keep them safe. All staff have been trained and recognise the need to be vigilant for the signs that may include:

- Unexplained gifts/new possessions – these can indicate learners have been approached by/involved with individuals associated with criminal networks/gangs, this includes children and adults at risk
- Children and adults at risk who go missing for periods of time or regularly come home late
- Children and adults at risk who regularly miss training or do not take part in education
- Change in friendships/relationships with others/groups
- Children and adults at risk who associate with others involved in exploitation
- Children and adults at risk who suffer from changes in emotional well-being
- Significant decline in performance
- Signs of self-harm/significant change in wellbeing
- Signs of assault/unexplained injuries

[www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges](http://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges)

### 5.13 Safeguarding Structure

- Our Senior Management Team have a responsibility to read and understand Part 1 of KCSIE (amended 2021). They are held ultimately responsible for ensuring that staff comprehend and discharge their roles and responsibilities including any staff with literacy needs or English as a Second Language.
- Senior Safeguarding Manager (Sharron Symon) - overall responsibility is to make sure that all staff, children and young people are kept safe in line with current legislation, approved codes of practice (ACOP) codes of practice (COP) and other guidance. Two Designated Safeguarding Leads and ensure that all activities on a day-to-day basis comply with the organisation's policies and procedures.
- All staff ensure that they adhere to the relevant policies and procedures to keep children and adults at risk safe and they must attend Safeguarding training and updates as agreed.
- Legislation and government guidance make it increasingly clear of the need for all adults to play a role in safeguarding. GP Strategies is fully committed to complying with all UK legislation and guidance to safeguard children and young people. This policy has been drawn up on the basis of legislation and guidance that seeks to protect children and adults at risk.
- Anyone offering confidentiality to a child would be promising to keep the content of his or her conversation completely secret and discuss it with no one. Promises of confidentiality must not be made whilst in contact



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with children and adults at risk. Confidentiality will not be promised by staff if a child's welfare is considered a safeguarding or child protection concern. GP Strategies will minimise the sharing of information, restricting it to circumstances where it is needed to ensure children and adults at risk well-being and safety.

- GP Strategies will keep all child protection and adults at risk records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children. We will cooperate with Police and Children's Services to ensure that all relevant information is shared for the purposes of child protection investigations under section 47 of the Children Act 1989 in accordance with the requirements of Working Together to Safeguard Children 2018.
- Sometimes, we are asked to share information about individuals with other organisations when there is not a concern about abuse or harm. If this happens, we will only share information when we have that person's explicit consent to do so.

### 5.14 Early Help

5.14.1 All staff should be mindful that early information sharing is vital for the effective identification, assessment and allocation of appropriate service provision, whether this is when problems first emerge or alternatively where a child is already known to the local authority children's social care.

5.14.2 If a child or adult at risk has not suffered and is not likely to suffer significant harm but is in need of additional support in the form of early help services, the DSL will always seek consent to share any welfare information. This includes:

- Disability
- specific additional needs
- certain health conditions including mental ill-health
- at risk of 'honour-based abuse
- County Lines including sexual or criminal exploitation
- a parent in prison/parental offending
- persistent absence from education.

5.14.3 The best interests of the child or adult at risk must always take priority and their wishes and feelings taken into account whilst decisions are made about suitable support. The DSL monitors the Early Help process in relation to children by using **the local Threshold Document**.

### 5.15 Multi-agency working

5.15.1 We recognise and are committed to our responsibility to work within local multi-agency safeguarding arrangements. The leadership team and DSL will work to establish strong and co-operative local relationships with the **right** professionals in other agencies in line with statutory guidance. We recognise the importance of multi-agency working and are committed to working alongside partner agencies to provide a coordinated response to promote children's and adults at risk welfare and protect them from harm. This includes contributing to local safeguarding processes as required. For example, relevant safeguarding multi-agency plans and meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or other early help multi-agency meetings.

### 5.16 Confidentiality and the Sharing of Information

5.16.1 This section should be read in conjunction with the Data Protection Policy.

5.16.2 It is imperative that information gained whilst working as an employee is only ever to be disclosed on a 'need to know' basis. The DSLs will determine the extent of the information to be shared and identify staff who may 'need to know' sensitive welfare and child protection information. Information should not be shared without prior consultation with the DSL. The unnecessary discussion of any information about children, young people and/or adults at risk is inappropriate. This is true even if the identities at issue are not disclosed. **GP Strategies should therefore be cautious in what they say in public about individuals and activities.**

5.16.3 The Data Protection Officer is **Paul Smith**.

### 5.17 Whistleblowing

5.17.1 We want to protect children, young people and adults at risk. Staff members on the frontline may be the only ones aware of potentially unsafe or inappropriate practice and it is important that they can raise awareness of it without fear of reprisal, regardless of whether the suspicions or allegations turn out to be true. One of the ways we do this is to provide an accessible reporting system to reveal any poor practice, abuse or unethical behaviour by staff within the organisation to those in positions of authority.

## **6. PREVENTING AND RESPONDING TO BULLYING**

### 6.1 E-safety

6.1.2 Our E-safety Policy provides guidance on how we use the internet and social media and our procedures for doing this. It also outlines how we expect our staff, children and adults at risk, who are enlisted on our programmes, to behave online. The purpose of the policy is:

- To protect all children, young people and adults at risk who make use of technology whilst in our care;
- To provide staff, children and adults at risk with a policy regarding on-line safety and how to respond to it;
- To ensure our organisation is operating in line with our values and within the law regarding how we behave on-line.

### 6.2 Anti-Bullying

Our Safeguarding and Prevent Policy sets out how we feel about bullying at GP Strategies, what we will do to tackle it and how we will support children, young people, adults at risk and our staff and volunteers who experience or display bullying behaviour.

#### 6.2.1 Bullying:

- All forms of bullying will be acted upon;
- Everybody at GP Strategies has a responsibility to work together to stop bullying;
- Bullying can include online as well as offline behaviour
- To be read in conjunction with the Peer-on-Peer guidance and e-Safety Policy.

#### 6.2.3 Bullying behaviour can include:

- physically pushing, kicking, hitting, pinching, etc;
- name calling, spreading rumours, persistent teasing and humiliation or the continual ignoring of others;
- posting of derogatory or abusive comments, videos or images on social media;
- racial, homophobic, transphobic or sexist comments, taunts or gestures;
- sexual comments, suggestions or behaviour;
- unwanted physical contact.

#### 6.2.4 We will:

- recognise our duty of care and responsibility to safeguard all players from harm;
- promote and implement this anti-bullying policy in addition to the Safeguarding and Prevent policy and procedures;
- ensure that bullying behaviour is not tolerated or condoned;
- require all staff members and volunteers to sign up this policy;
- take action to investigate and respond to any reports of bullying from children and young people;
- encourage and facilitate children, young people, staff and volunteers to play an active part in developing and adopting a code of conduct for behaviour;
- ensure that coaches are given access to information, guidance and training on bullying.

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6.2.5 Each staff member, volunteer and student will:

- encourage individuals to speak out about bullying behaviour;
- respect every child, young person and adult's need for, and right to an environment where safety, security, praise, recognition and opportunity for taking responsibility are available;
- respect the feelings and views of others;
- recognise that everyone is important and equal, and that our differences make each of us special and worthy of being valued;
- show appreciation of others by acknowledging individual qualities, contributions and progress;
- ensure safety by having rules and practices carefully explained and displayed for all to see;
- report incidents of bullying behaviour they see – **by doing nothing you are condoning the behaviour.**

6.2.6 Supporting children, young people and adults at risk:

- We will let children, young people and adults at risk know who will listen to and support them;
- We will create an "open door" ethos where they feel confident to talk about bullying behaviour or any other issue that affects them;
- Potential barriers to talking (including those associated with disability or impairment) will be acknowledged and addressed at the outset to enable children and young people to speak out;
- We will make sure children, young people, adults at risk, staff and volunteers are aware of helpline numbers;
- Anyone who reports an incident of bullying will be listened to carefully and reports will be taken seriously;
- Any reported experience of bullying behaviour will be investigated and will involve listening carefully to all those involved;
- Children, young people, adults at risk, staff and volunteers experiencing bullying behaviour will be supported and helped to uphold their right to work, play and live in a safe environment;
- Those who display bullying behaviour will be supported and encouraged to develop better relationships;
- We will make sure that sanctions are proportionate and fair.

6.2.7 Support to the parents/guardians (dependent on age of the learner):

- Parents or guardians will be advised on the anti-bullying policy and practice;
- Any experience of bullying behaviour will be discussed with the child or young person's parents or carers;
- Parents will be consulted on action to be taken (for both victim and bully) and we will agree on these actions together;
- Information and advice on coping with bullying will be made available;
- Support will be offered to parents, including information from other agencies or support lines.

6.3 Peer on Peer Abuse

6.3.1 As an organisation working with children and young people, we recognise the importance of keeping them safe. Peer on peer abuse, including abuse within intimate relationships can impact on children/young people in a number of different ways including physical injury, compromised sexual health and criminality. We will keep children and young people by training our staff to recognise, refer and record any concern in this area immediately to the DSL.

6.3.2 See **Peer on Peer Guidance leaflet**.

## 7. PROCEDURES FOR LEARNERS ON APPRENTICESHIPS, TRAINEESHIPS OR OTHER WORK-BASED PLACEMENTS

7.1

- Learners' work-placement companies/employers will be furnished at the outset with a 'Sign-up Safeguarding' agreement which outlines our responsibility to report any incidents of inappropriate practice or safeguarding issues.
- Learners should report safeguarding concerns to their coach or any other member of GP Strategies' management team.

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- Staff members will notify the DSL.
- Staff should be clear on reporting a safeguarding or welfare issue as illustrated.
- The DSL must notify the employer or an authorised person from the work-placement company, and together they will decide on next steps, taking advice where necessary, if the information is such that the matter should be referred immediately to Social Services.
- The DSL or coach will provide the learner with advice and/or support and, if necessary, signpost them to external support services where appropriate.

7.2 When a learner is concerned that the above procedures for placement-based setting staff have not been carried out appropriately or adequately, the following should apply:

- Learner reports concern to GP Strategies coach or staff member who informs the DSL
- The DSL will initially discuss the concern with the learner where necessary and maintain a written record of the details.
- The DSL will discuss the concern with the coach and together they will decide, taking advice where necessary and maintaining a written record where appropriate if the information is such that the matter should be referred immediately to the employer and/or the local authority Social Services.
  
- If agreement cannot be reached, the decision should be made by the DSL but where there is doubt, a referral may be made by the coach to the VP of GP Strategies .
- Communication between GP Strategies and the employer should be maintained.
- Whatever the decision, the learner should be informed of actions taken.
- The DSL will, wherever possible, work closely with the safeguarding staff in the setting/employer to ensure service users/children are protected. Full cooperation will be maintained to ensure all safeguarding risks are reduced and managed effectively. In the event of any uncertainty or conflict between the approaches taken by GP Strategies and the setting/employer then the matter will be discussed with the statutory safeguarding agencies to agree the most appropriate way forward.

### 7.3 Off-The-Job Training

7.3.1 Safeguarding will be promoted to all learners as follows:

- During onboarding, learners will be introduced to Safeguarding and Prevent and how to recognise and report a concern at orientation;
- During training sessions – safeguarding will be embedded in the curriculum as appropriate;
- During progress reviews – learners’ understanding about safeguarding and Prevent will be checked and reinforced.

### 7.4 Security

7.4.1 All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light. Learners are required to wear ID badges on the GP Strategies’ training site and follow security guidelines of their places of work.

7.4.2 Staff will be expected to adhere to any safety arrangements implemented because of Covid-19 restrictions. Appropriate checks will be undertaken in respect of visitors coming onto our premises as outlined within guidance. Visitors will be expected to, sign in and out via the office visitors log and to display a visitor’s badge whilst on site. Visitors will be expected to adhere to any safety arrangements implemented because of Covid-19 restrictions. Any individual who is not known or identifiable on site should be challenged for clarification and reassurance.

7.4.3 We will not accept the behaviour of any individual that threatens security or leads others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to GP Strategies sites.

### 7.5 The Code of Practice

7.5.1 Our Code of Practice will help to protect children, young people and adults at risk from abuse and inappropriate behaviour. It will also help staff to maintain the standard of behaviour expected of them and should reduce the possibility of unfounded allegations being made against them.

## **8. PREVENT DUTY**

### 8.1 Safeguarding students who are vulnerable to extremism

8.1.1 GP Strategies have a legal responsibility to fulfil the Prevent duty statement by protecting apprentices and employees from radicalising influences and ensuring they are resilient to extreme narratives. As a responsible organisation we will look to identify any changes in behaviour and deal with any issues raised by them. We are aware that there have been occasions, both locally and nationally, in which extremist groups have attempted to radicalise vulnerable children/young people to hold extreme views including those justifying political, religious, sexist, or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation. The Prevent strategy aims to stop people from becoming terrorists or supporting terrorism. It is rare for children to become involved in terrorist activity. However, some students from an early age can be exposed to terrorist and extremist influences or prejudiced views. Consequently, GP Strategies takes the view that early intervention is always preferable and includes this in its procedures as it does for all safeguarding concerns.

### 8.2 Signs and Indicators

8.2.1 Radicalisation can be really difficult to spot. Signs that may indicate a young person is being radicalised include:

- Isolating themselves from family and friends;
- Talking as if from a scripted speech; using inappropriate language;
- Unwillingness or inability to discuss their views;
- A sudden disrespectful attitude towards others;
- Increased levels of anger;
- Increased secretiveness, especially around internet use;
- Sympathetic to extremist ideologies and groups;
- Changing identify or friends online;
- Endorsing material of an extremist nature.

8.2.3 Young people who are at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination. However, these signs do not necessarily mean a person is being radicalised – it may also be the typical behaviour or a sign that something else is wrong.

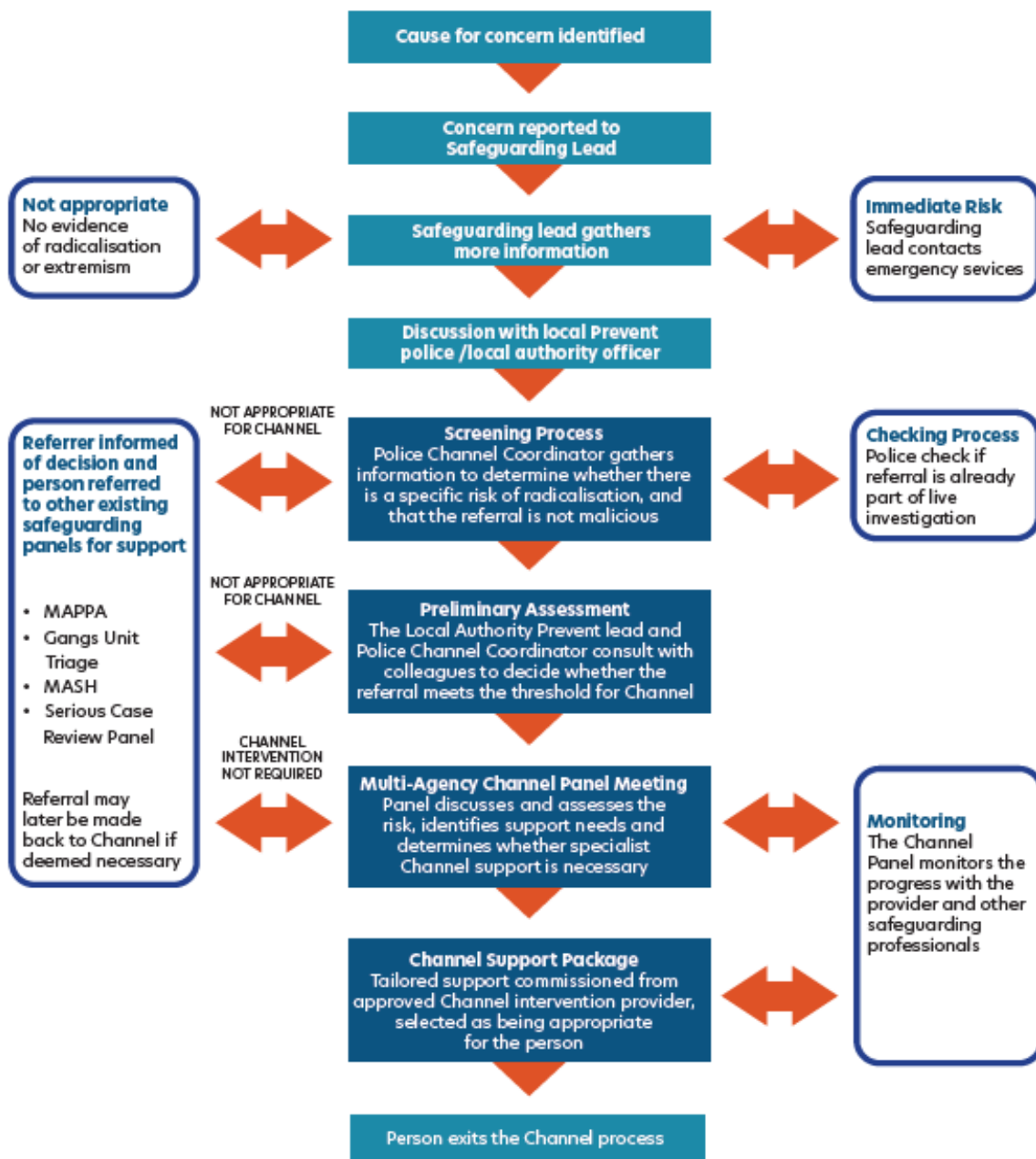
8.2.4 GP Strategies take measures to protect and make apprentices and employees resilient to extreme narratives in the following way:

- A Prevent Duty Risk Assessment/Action Plan which is monitored on a quarterly basis;
- A staff induction which includes the certificated module on the Prevent Duty;
- Pinnacle eLearning is delivered to all learners as part of their induction inclusive of Equality and Diversity, Prevent, Safeguarding, Fundamental British Values. This training is supplemented at each review with the skills coaches;
- All managers are briefed on their duty and responsibility regarding Prevent;
- Annual PREVENT staff training is scheduled and delivered through the in-house training scheme;
- Apprenticeship initial assessment, commitment statement, learner and employer handbook all reference Prevent;

## Safeguarding & Prevent Policy

- Pinnacle eLearning training is delivered to learners at induction inclusive of Prevent, Equality and Diversity, Safeguarding and Fundamental British Values;
  - An integrated safeguarding including Prevent reporting email box has been introduced via: [safeguardingreporting@gpstrategies.com](mailto:safeguardingreporting@gpstrategies.com)
- 8.2.5 Designated safeguarding including Prevent 24/7 advice and support line Example learner and employer handbook which references Prevent.
- 8.2.6 PREVENT Risk assessment & Action Plan: <https://www.gpstl-apprenticeships.co.uk/resources/prevent-duty-risk-assessment.pdf>

## The Channel Process



## 9. EQUALITY AND DIVERSITY

9.1 As an organisation we want to prevent discriminatory practice and uphold the rights of children and young people, as well as staff in line with Article 2 of the United Nations Convention on the Rights of the Child. Our Equality and Diversity Policy ensures that this right is put into effect.

## 10. COVID – 19

10.1 The Senior Vice President in consultation with Government guidelines and the Senior Management Team (SMT) will undertake a management assessment of the potential risk which will then be included within the local Contingency, Preparation, Planning and Implementation Plans.

10.2 This risk assessment will outline those actions and controls required to properly prepare the Company and minimise risk to the continuity of the business arising from a Pandemic/Epidemic which includes as a minimum reference to Business, Employees, Customers, Suppliers, IT Systems and Associates.

10.3 In carrying out this assessment, consideration shall be given to five main areas:

1. Analysing the business
2. Assessing risk
3. Developing a Strategy
4. Developing a Plan
5. Communicating the Plan to affected parties

10.4 Business, Employees, Customers, Suppliers, IT Systems and Associates and all operations key to the continuity of operations shall be evaluated to establish the most likely and greatest risk to the business.

10.5 The assessment shall determine what action is required to ensure the business continues to function effectively at minimum staffing and service levels.

**See Pandemic Preparedness Policy**

## 11. COMPLAINTS

11.1 GP Strategies recognises the right of children, young people, their parents/carers and adults at risk to have access to the complaints' procedure. We intend to ensure that all comments are taken seriously and dealt with swiftly and in confidentially.

11.2 Children, young people adults at risk and, where appropriate, parents/carers should know how to, and feel able to, complain or make comments if they are unhappy or pleased with any aspect of GP Strategies. We manage this process through our Complaints Policy and procedure.

## 12. CONTACT DETAILS

12.1 Safeguarding children and young people or keeping them safe is everybody's responsibility. If you think that a child might be the victim of abuse, neglect, radicalisation or they may be at risk of harm, you should always report your concerns to:

- Designated Safeguarding Lead (Early Years) = Tel: 07917193029
- Designated Safeguarding Lead (Adult Health and Social Care) = Tel: 07917193029
- Senior Safeguarding Manager (Sharron Symon) = Tel: 07789984150
- Safeguarding Hotline – 0330 0183 531
- Emergency email – [safeguardingreporting@gpstrategies.com](mailto:safeguardingreporting@gpstrategies.com)

12.2 Children's Services and Adult Safeguarding Duty Teams will generally work 9am to 5pm Monday to Friday, and have an answerphone for out of office hours and weekends

12.3 As GP Strategies works nationally with many different local authorities, the Safeguarding Team will contact the relevant Safeguarding Team dependant on each individual situation.

12.4 The online tool Report Child Abuse to Your Local Council directs to the relevant local children's social care contact number.

12.5 **In an emergency always dial 999**

- Police emergency - 999
- Police non-emergency - 101
- LADO
- NSPCC Helpline - 0808 800 5000
- CEOP - [www.ceop.police.uk](http://www.ceop.police.uk)

### 13. MONITORING

13.1 GP Strategies will ensure that all staff are aware that it is their responsibility to:

- Refer all welfare and disclosures to the DSL;
- Protect children from abuse;
- Be aware of GP Strategies safeguarding and child protection policy and procedures;
- Include the DSL in matters of concern regarding staff conduct;
- Undertake appropriate training, refresher training which will be updated every 2/3 years in accordance with CAB/SAB requirement.

13.2 Two senior quality managers will monitor and review the implementation of the Safeguarding and Prevent policy and procedures on a quarterly basis on behalf of the Board.

13.3 GP Strategies will appoint an independent external consultancy to annually review this policy and the implementation of its procedures, and in also in the following circumstances:

- Changes in legislation and/or government guidance;
- As required by the Safeguarding Children's Board (SCB) or Safeguarding Adults' Board (SAB)
- As a result of any other significant change or event;
- New activity or service implemented.

13.4 This policy should read alongside our policies and procedures on:

- Safer Recruitment
- Whistleblowing
- E-safety
- Safeguarding Code of Practice
- Equality, Diversity and Opportunities
- Equal Access
- Complaints
- Peer on Peer Abuse Guidance
- Anti-bullying
- Health and Safety
- Data Protection
- Annex 1 (Categories and Signs of Abuse)
- Annex 2 (Glossary of Terms)
- Annex 3 (National Support Organisations)