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# PREVENT, SAFEGUARDING YOUNG PEOPLE, CHILD PROTECTION AND VULNERABLE ADULTS POLICY

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## 1. Aim

The aim of General Physics UK Ltd, and its Group Companies (hereunder referred to as “The Company”) is to provide and maintain an environment where young people, vulnerable adults and all learners regardless of gender, ethnicity, disability, sexuality or religion (hereunder referred to as “Learner(s)”, feel secure, safe are encouraged to talk, and are listened to. The Company is committed to ensuring Learner’s know that there are staff at each training centre whom they can approach if they are worried or have any concerns. The Company will provide opportunities throughout the learning programme for Learners to develop the skills they need to stay safe, healthy and recognise and respond to abuse and harmful behaviours.

All employees of the Company recognise that safeguarding is everyone’s responsibility irrespective of the role they undertake or whether their role has direct contact or responsibility for learners or not.

In adhering to this policy and its procedures staff and visitors will contribute to the delivery of our outcomes for learners as set out in the Children’s Act 2004 and support the government’s strategy for preventing and tackling Extremism and Radicalisation within the UK.

## 2. Statement of Intent

The Company will:

- Ensure we practice safe recruitment in checking the suitability of training and assessment staff, service providers, sub contractors and volunteers to work with learners through implementing pre-employment DBS and reference checks
- Ensure learners engaged in placements within sectors requiring DBS clearance are registered and checked prior to placement
- Develop staff to identify and respond to potential indicators of abuse, neglect, harmful behaviours, exploitation, extremism and radicalisation and other safeguarding concerns among learners.
- Work with safeguarding organisations, services and agencies to raise awareness of safeguarding issues
- Raise learner awareness of health, safety and safeguarding issues, equipping learners with the skills needed to keep them safe
- Ensure young learners and vulnerable adults engaged in placements or training programmes are not working alone or supervised by a single adult, Learners aged 16 or over, may be included in the ratios if the provider is satisfied they are competent and responsible.
- Implement procedures for identifying and reporting cases, or suspected cases, of abuse and harmful behaviours
- Work with Safeguarding Organisations and Interagency Frameworks to support learners who have been abused in accordance with his/her agreed protection plan
- Work with Channel the National Home Office Safeguarding Project to prevent children or young adults from being drawn into violent radicalisation or extremism activity
- Respond appropriately to allegations against staff, service users and other adults
- Through our information, advice and guidance services and programme delivery equip learners with the knowledge, skills and critical thinking to enable them to make positive judgements and recognise harmful or inappropriate behaviours relating but not limited to:
  - Bullying
  - Abuse
  - e.safety

Revenge Porn  
Child Sexual Exploitation  
PREVENT

- Maintain high level of security at all centres with reception teams check the identity of all visitors
- Through the implementation and embedding of the five Every Child Matters outcomes within all learner processes we shall establish a safe, stable and secure environment in which learners can learn, develop and feel valued
- Implement strategies to ensure learners are equipped with the knowledge of how to keep themselves safe during a pandemic

### **3. Responsibilities**

Whilst it is expected that all staff of the Company will accept personal responsibility for practical application of the policy, lead responsibility for its implementation will rest with the Senior Vice President, the Vice President, Senior Management Team and the Lead and Local Nominated Person(s) responsible for Learner Safeguarding. The term Safeguarding is inclusive of matters relating Prevention of Violent Extremism and Radicalisation.

### **4. Method**

- 4.1 The Company shall designate a Lead Person responsible for Learner Safeguarding who has received appropriate training and support for this role. This person shall be responsible for reviewing and recording allegations, changes in behaviour patterns or reported incidents/events and for forwarding the outcome where necessary to the appropriate safeguarding board, organisation or authority for further investigation
- 4.2 Each GPSTL centre/region shall have a designated Safeguarding Contact responsible for Learner Safeguarding who has received appropriate training and support for this role. This person will be responsible for reporting allegations, changes in behaviour patterns and incidents/events to the Lead Person responsible.
- 4.3 Every member of staff (including temporary, supply staff and volunteers) and appropriate partners (Schools, Connexions, Referral Agencies and Employers) shall be briefed on the name and contact arrangements of the Company designated persons responsible for safeguarding and their roles.
- 4.4 All staff shall undergo formal training at induction on how to respond to potential indicators of abuse, neglect, harmful behaviours, changes in behaviour patterns and safeguarding concerns. Staff shall undergo regular further training as part of their ongoing CPD schedule and adhere to the Safeguarding Code of Conduct which forms part of this policy, contract of employment and job description.
- 4.5 The Company shall ensure that employer network partners, parents/guardians have an understanding of the responsibility placed on the Company and its staff for safeguarding by setting out its obligations within the Learner/Employer Network Partner Handbook and Company website. Information on safeguarding shall be provided by the Company through the Company Website along with the issue of supporting organisation materials and resources.
- 4.6 The Company shall notify the designated support services and interagency networks of any unexplained absence of more than two days of a learner who is on the protection register.

- 4.7 Effective links between the Company and all relevant agencies shall be maintained and full co-operation shall be afforded to all parties on enquiries regarding Safeguarding, Learner Protection, Policing and Welfare matters including attendance at case conferences.
- 4.8 Written records shall be held securely; separate from the main learner administration file, in locked cabinets. Information held electronically, password protected and shall be shared only with those who have direct input to a case. All data shall be held in line with the requirements of the Data Protection Act 1998 and the General Data Protection Requirements 2018.
- 4.9 Regional Managers shall access a copy of their local Social Services Interagency Partnership Procedure for Child Protection and Protection of Vulnerable Adults along with the local Channel Project referral procedure. This information shall be held within the local Safeguarding Key Information File.
- 4.10 Regional managers shall establish contact with their local Social Services department to determine their safeguarding 'alert' procedure and point of contact along with their local Channel Project Co-Ordinator and record this information within their Safeguarding Key Information File
- 4.11 The Company shall follow standard procedures where an allegation is made against any person, service provider or member of staff.

## **5. Whistle Blowing**

Where there are concerns of any form of safeguarding, extremism or radicalisation learners, employees and their employers or placement organisations shall be encouraged to make use of our internal systems to Whistle Blow and raise any issue in confidence with any member of staff.

## **6. Review of Policy**

The policy will be subject to regular review by the Company, annually as a minimum or whenever changing legislation and/or internal evaluative findings determine a review. The Safety, Welfare and Safeguarding strategy forms part of this policy.


## **7. Definition**

A young person is defined as a person/s under the age of 18 (The Children Act 1989).  
A vulnerable adult is a person over the age of 18 (Protection of Vulnerable Adults (POVA)).

## **8. Referenced Procedures and Documentation**

Staff Safeguarding Code of Conduct  
GP-100-OP-18-SF-01 External Partners DBS Check Register  
GP-UK-A-03 Data Protection Policy  
GP-UK-C-01 Equal Opportunities Policy  
GP-UK-P-06 Grievance  
GP-UK-P-07 Discrimination and Anti Harassment  
GP-UK-P-13 Employee Induction Policy  
GP-UK-HS-01 Health and Safety Policy  
GP-UK-HS-02 General Arrangements for Policy Implementation  
GP-100-OP-03 Health and Safety Employment Locations  
GP-100-OP-07 Recruitment, Induction and Initial Assessment  
GP-100-OP-08 Learner Reviews

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|-----------|-----------------------------------------------------------------------------------|--------|----------|
| Signed:   |  | Dated: | 14.02.20 |
| Position: | Senior Vice President Europe                                                      |        |          |

**Safeguarding – Scope of Procedure**  
**Definition – a child or young person under the age of 18**

**Concerns:**

What is or may be happening to a child or young person in an organisation.  
What is or may be happening outside that organisation (for instance in their own family).

**Concerns may be about the behaviour of:**

- A young person
- A friend or colleague
- A family member
- A member of staff
- A provider of a service
- Actions or inactions taken/not taken regarding the risk to a child or young person.

**Any member of staff receiving such information in all circumstances must respond in accordance with the following procedure – DO NOT INVESTIGATE ANY CASE YOURSELF**

**Immediate action to take if, as an employee of the Company you observe abuse taking place within the workplace relating to learner safeguarding**

Do all you can to stop the abuse immediately without putting yourself, the child or young person at undue risk.

Inform the perpetrator of your concerns and advise them to stop and ask them to move themselves to an area where there is no contact with children and young persons.

Advise them that you will immediately be informing the Senior Person on site and the Senior Person at GPSTL.

If the perpetrator fails to desist – call for assistance.

If the perpetrator does desist – stay with the child or young person until you can transfer them to the care of another responsible adult.

Inform the Senior Person on site of what you have seen.

Write notes on what you have seen, who did what, what was said and what you did including the date, time and location, name of the perpetrator, name of the child or young person, sign and date your notes.

Report the incident immediately to your local GPSTL Safeguarding Contact who will inform the designated Lead Safeguarding Contact

The Lead Contact shall after discussion and review determine what further action is required and whether the

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incident/concern should be referred for investigation

The Lead Contact shall inform the Senior Person within the employer organisation of action taken.

**Immediate action to take if, as an employee of the Company you receive an allegation or disclosure relating to a learner safeguarding**

If you are in direct contact with the person raising the concern for instance through a telephone call or discussion:

Do not promise confidentiality.

Explain what will happen next and assure them that you will only tell those you have to tell to try and get the matter dealt with.

Avoid asking leading questions.

Ask only what you need to know.

Details of the allegation.

Name, DOB and address of child or young person.

Think about the immediate risk to the child or young person and what can be done to minimise the immediate risks.

Take notes of what has been said.

Don't at this stage inform the person who is the subject of an allegation what you have been told.

If you are not in direct contact with the person raising the concern, for instance if you have received a letter or email:

Retain any written records including emails and letters.

Don't at this stage inform the person who is the subject of an allegation what you have been told.

Report the incident immediately to your Local GPSTL Safeguarding Contact who will inform the designated Lead Contact

The Lead Contact shall after discussion and review determine what further action is required and whether the incident/concern should be referred for investigation

**Allegations regarding an employee of the Company, Sub-Contractors or Co-Worker  
Any member of staff receiving such information in all circumstances must respond in accordance with the following procedure – DO NOT INVESTIGATE ANY CASE YOURSELF**

**Immediate action to take if you receive an allegation regarding an employee of the Company, Sub-Contractor or Co-Worker.**

Report the incident immediately to the Company designated Lead Safeguarding Contact

The Lead Contact will liaise with Vice President and Senior Vice President to co-ordinate an internal investigation which may include referral to the relevant external safeguarding protection authority.

Internal investigations will be implemented in line with the Company's standard procedures; GP-UK-P-07

Discrimination and Anti Harassment, GP-UK-P-06 Grievance and GP-UK-P-08 Disciplinary.

**Safeguarding Vulnerable Adults – Scope of Procedure**  
**Definition – someone over the age 18 years who:**

**Is or may be in need of community care services by reason of mental or other disability, age or illness**  
**Is or may be in need of additional support through learning difficulties**  
**Is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation**

**Concerns:**

Physical abuse.  
Sexual abuse.  
Psychological abuse.  
Financial or material abuse.  
Neglect or acts of omission.  
Discriminatory abuse.  
Exploitation in any form

**Concerns may be about the behaviour of:**

A person  
A member of staff.  
A provider of a service.  
A family member  
A friend or colleague  
Actions or inactions taken/not taken regarding the risk to an adult.

**The principles for staff identifying and responding to incidents of concern relating to adults are the same as those for children and young persons. In most cases the process and guidance outlines within the in the aforementioned sections will need to be followed.**

**In the event of an act of abuse or neglect of a vulnerable adult is identified or suspected then as an employee of the Company you should:**

Ensure the persons immediate safety.  
Do not promise confidentiality or agree to keep something secret.  
Do not investigate yourself and avoid asking leading questions.  
Obtain the necessary information to make an informed referral.  
Advise the Senior Person within the employer organisation.

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Make and keep a record of the incident and actions taken.

Report the incident immediately to your Local GPSTL Safeguarding Contact who will inform the designated Lead Contact

The Lead Contact shall after discussion and review determine what further action is required and whether the incident/concern should be referred for investigation

## PREVENT – Reporting Incorporating the Channel Process

### **Cause for concern identified:**

Change in behaviour patterns and moods

Using the internet to access extremist group information

Expressing extreme political or radical views

Appear increasingly sympathetic to terrorist acts

A change in the groups of friends they spend time with

### **Concern reported to local safeguarding contact**

### **Concern reported to safeguarding lead contact**

### **Safeguarding lead gathers more information and determines level of risk**

**No risk** – inform source of outcome

**Some level of risk** – refer to **Channel and inform BIS Co-ordinator**

**Immediate Risk** – contact emergency services

### **Channel Referral**

**Screening process** – police Channel coordinator gathers information to determine whether there is a specific risk of radicalisation and that the referral is not malicious.

Police check if referral is already part of live investigation

**Preliminary Assessment** – the local authority prevent lead and police Channel co-ordinator consult with colleagues to decide whether the referral meets the threshold for Channel

**Multi-Agency Channel Panel Meeting** – panel discusses and assesses the risk, identifies support needs and determines whether specialist Channel support is necessary

**Channel Support Package** – Tailored support commissioned from approved Channel intervention provider, selected as being appropriate for the person

### **Person exits the Channel process**

### Internal DBS Process

The appointed Recruiter within the Central Recruitment Team, or the line manager responsible for recruiting, will advise candidates of the DBS application process by formal email at the point of invitation to 1<sup>st</sup> stage interview with the Recruiter and supply a list of the different forms of approved ID as shown on the attached document, the applicant will also be advised to bring the following information with them to interview:

- Full current name
- Time lived at present address
- Town of Birth
- Date of Birth
- All previously used names (first name, middle name and surname) and their dates of use
- Their full and complete address history together with postcodes over the last five years

#### **For those who currently hold a DBS Certificate**

The email inviting candidates for interview will ask that they bring their actual DBS Cert to interview, so

- Managers can check if the DBS is GPSTL compliant – i.e. all Barred List checks must have been requested, and state “NONE RECORDED” in each section.
- If not, managers will do an on line application for a new DBS Cert with the candidate present with their ID as below.
- If it is GPSTL compliant as above, the manager will scan a copy to JD to verify registration with the Update Service

#### **For all others, the DBS application will be made at the 2<sup>nd</sup> stage interview with the hiring manager if the interviewer is to move to offer stage. HR issue an offer subject to DBS and references, including JD in the offer email – BCC.**

The ID Checker checks ID and inputs details on line

Applicant immediately goes on line (at centre) to complete DBS Application

DBS application is immediately sent to AD

AD completes a quality check and forwards for police checks to be completed

When all police checks are concluded, the DBS website advises JD and the ID Checker that the applicant will be issued with a DBS certificate in the next 7-10 days. Only JD will know if there are issues showing on the Certificate, the ID checker must not contact the applicant at this stage

JD monitors the DBS application process throughout to validate satisfactory DBS disclosure

**Post successful 2<sup>nd</sup> stage interview** Vice President authorises on Taleo, the applicant is advised, and the DBS application process is concluded.

After approval, when advised that the DBS certificate is being issued, JD emails the applicant (or the Recruitment Agency) to advise they will shortly be in receipt of the DBS Certificate and for the applicant to forward the original certificate to the Company, having firstly registered with the **Update Service**; which is a mandatory GPSTL requirement.

Applicants **must** provide GPSTL sight of DBS certificate prior to first day employment

In instances where issues are identified on the DBS Certificate the applicant is advised by JD and sight of DBS requested prior to registration with the **Update Service** so that the issues contained are verified against any notified on the application form or at interview and DM and SS approval sought to progress the application.



In instances where the DBS certificate is satisfactory, upon receipt of the original DBS certificate JD logs as seen on the DBS website, ensures it is GPSTL compliant and verifies registration with the Update Service.

The line manager is advised that as dependant on receipt of 2 x satisfactory references, the applicant's documents can be sent to the Vice President for final approval and a start date confirmed

EMEA HR will set successful candidates up on the Taleo on-boarding system with an offer letter confirming the start date, contractual and payment documents, for return as their formal acceptance of the offer.

**Review and Updates**

- Employee DBS status shall be monitored for changes in status by JD
- All current staff requiring DBS clearance must renew their registration with the Update Service annually