

# Safeguarding and Prevent Policy



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## **Scope**

The purpose of this policy is to state the GEL's standing on Safeguarding and to set out how this policy is implemented. This policy applies to all members of staff employed by Gloucestershire Enterprise Ltd (GEL) and to all students enrolled on a learning programme with us. GEL will ensure that all staff, students, partners, visitors, contractors and sub-contractors share its viewpoint and reflect it in everything they do.

## **Policy Statement**

GEL is committed to ensuring the safety of its staff and students. All staff at GEL have a duty under the guidance and legislation to identify any students who may be experiencing or at risk of experiencing, abuse or harm at GEL, at home, through online networks or in relationships and take appropriate action to ensure their safety.

### **1.0 Aims**

This policy aims to:

- Provide a safe and welcoming learning environment, in which all students are respected and valued and are capable of making excellent progress in their learning.
- Assure safe staff recruitment procedures built around Disclosure and Barring Service (DBS) checks, through scrutiny of references and ongoing monitoring and review of practice.
- Help staff and students alike to equip themselves with the information and awareness necessary to keep themselves safe.
- Maintain and explicitly promote those procedures, which help to identify suspected cases of abuse, report and act upon them.
- Provide appropriate support to students or staff who have been the victim of abuse.
- Contribute to effective partnership working between all those in the wider community involved in providing safeguarding services and GEL itself.
- Work with those partners to provide a co-ordinated offer of help when the additional needs of students are identified.

#### **The outputs of the Policy are to:**

- Provide an environment where safeguarding is thoroughly understood, embraced by all members of GEL and applied with a high degree of consistency.
- Assure that GEL resources in safeguarding are focused within a risk management approach that serves those groups identified as being relatively vulnerable.
- Assure compliance to the Equality Act, recognising the potentially high risk of some students with particular protected characteristics.

### **2.0 Definitions**

The term Safeguarding describes the broader preventive and precautionary approach to planning and procedures that are necessary to be in place to protect children and young people and vulnerable adults from any harm or damage. The following categories of abuse are used in Children's legislation and Adult Guidance:

- 2.1 **Physical abuse** may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

- 2.2 **Emotional abuse** may involve conveying to young people that they are worthless or unloved, inadequate. It may involve serious bullying (including cyberbullying), causing young people frequently to feel frightened or in danger, or the exploitation or corruption of children or vulnerable adults. Some level of emotional abuse is involved in all types of abuse though it may occur alone.
- 2.3 **Sexual abuse** involves forcing or enticing a young or vulnerable person to take part in sexual activities, not necessarily involving a high level of violence. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as looking at, or in the production of, sexual images or watching sexual activities, or grooming a child or vulnerable person in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children and young people.
- 2.4 **Neglect** is the persistent failure to meet a child's or vulnerable adult's basic physical and/or psychological needs, likely to result in the serious impairment of their health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Neglect may involve a parent or carer failing to provide adequate food, clothing or shelter.
- 2.5 **Discriminatory Abuse** includes behaviour towards a student that is racist, sexist, based on a person's disability and other forms of harassment.
- 2.6 **Financial or Material Abuse** is stealing possessions or money from a child or vulnerable adult or bullying to force them to hand over money or possessions.
- 2.7 **Institutional abuse/Poor practice** is inappropriate or disrespectful or insufficient care, which affects the whole setting and denies or restricts dignity, choice or fulfilment of persons at risk.
- 2.8 **Non-Contact Abuse** are abusive acts which do not involve actual physical contact; pornographic or violent films, sexual acts performed in front of the victim, violent acts with the abused present.
- 2.9 **Risk to self and/or others** may include but is not exclusive to severe self-harm, suicidal tendencies or potential risk of harming others, which may or may not include children. This may be as a consequence of an individual experiencing a significant level of personal, emotional trauma and/or stress.

Self-harm is a term that covers a range of behaviours used as a coping mechanism where an individual harm themselves by psychically inflicting pain or excess to deal with emotional pain. Common methods of deliberate self-harm include:

- Cutting
- Over-eating or under-eating Burning your skin
- Inserting objects into your body
- Hitting yourself or walls
- Taking an overdose
- Swallowing hazardous substances
- Exercising excessively
- Scratching and hair pulling

The majority of people who self-harm are using this method as an attempt to cope with difficulties and problems they have experienced or continued to be experiencing. Often the purpose is to feel alive, and NOT to end their life. Favazza (1998) states quite definitely that self-harm is distinct from suicide. A basic understanding is that person who attempts suicide is seeking to end their life and the end of feelings whereas a person who self-harms seeks to feel better. However, there is a possibility that those who self-injure may commit suicide either accidentally or deliberately as the result of their actions, therefore serious self-harm falls within safeguarding.

- 2.10 **Financial or Material Abuse**, including theft, fraud, exploitation, pressure in connection with wills, property or inheritance of financial transactions, or the misuse or misappropriation of property, possessions or benefits.
- 2.11 **Sexual Exploitation** is a form of sexual abuse where a child or young person are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. Consent cannot be given (under the age of 18 years) even where a young person believes they are voluntarily engaging in sexual activity with the person who is exploiting them Sexual exploitation does not always involve physical contact and can happen online.
- 2.12 **Sexting** generally refers to the sending of sexually explicit images via text, email, MSN or through social networking sites. For example, this could be a picture of a boy or young man exposing himself or a young woman in a state of undress. "Sexting" is more common than you may think and has been found to be commonplace amongst children and young people. Young people (under 18) texting intimate pictures of themselves via social media are committing a criminal offence (distribution of child pornography) and can face police action even if their actions are entirely voluntary.
- 2.13 **Forced Marriage** - forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage.
- 2.14 **Honour Based Violence** or so-called honour-based violence (HBV) encompasses crimes which have been committed to protect or defend the honour of a family and/or community, including female genital mutilation, forced marriage and practices such as breast ironing. All forms of HBV are abuse and should be handled and escalated as such.
- 2.15 **Female Genital Mutilation (FGM)** is a mandatory reporting duty and comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse. Section 5B of the Female Genitalia Mutilation Act 2003 (as inserted by section 74 of the serious crime act 2015) places a duty upon teachers/tutors to report to the Police where they discover that FGM appears to have been carried out on a child under 18 years.

### **Statutory Framework.**

In order to protect young people and vulnerable adults the GEL will act in accordance with the following legislation and guidance:

- PREVENT Duty Guidance 2021 / Counter Terrorism Act 2015  
Safeguarding Vulnerable Groups Act (2006)
- Safeguarding Vulnerable Adults Act (2006)

- The Children's Act 1989 and 2004
- Sex Offences Act 2003
- Sex Offenders Act 1997
- Education Act 2002 section 175
- Safeguarding Children and Safer Recruitment in Education 2011
- Counter Terrorism and Security Act 2015
- Disclosure and Barring Service 2014
- Equality Act 2010
- Children and Families Act 2014
- Procedures for Gloucestershire Children's Safeguarding Board
- Child Sexual Exploitation – Definition and Guide for Practitioners – 2017
- CONTEST Counter Terrorism Strategy (2018)
- Working Together to Safeguard Children (2018)
- Keeping Children Safe in Education (2021)

In accordance with the Department for Education (DfE) guidance Safeguarding Children and Safer Recruitment in Education, GEL complies with the following responsibilities.

- Staff are trained to recognise the signs of abuse and know to whom they should report concerns or suspicions
- Procedures are in place (which staff are aware of) for handling suspected cases of abuse of students, including procedures to be followed if a member of staff is accused of abuse, or suspected abuse.
- A Designated Safeguarding Lead (DSL) has responsibility for coordinating action within GEL and for liaising with other agencies.
- Staff with designated responsibility for safeguarding receive appropriate training.

### **3.0 Radicalisation and Extremism**

GEL seeks to protect children and young people against the messages of violent extremism including, but not restricted to, those linked to Islamist ideology, far right and extremist animal rights movement. GEL values freedom of speech and the expression of beliefs as fundamental rights in our society, however it recognises that freedom of speech is subject to laws and policies. With this regard the PREVENT agenda has led GEL to put in place a visiting speaker's procedure to keep our young people safe. The Designated Safeguarding Lead will lead and liaise with the Police over matters related to students combatting extremism.

### **4.0 Online Safety**

GEL will do all it reasonably can to ensure that all users of its IT systems are protected by applying appropriate filters and raising awareness through training in how to keep safe on-line. Supportive materials, on-line questionnaires, tutorials and workshops are available for students on a range of online safety issues, e.g. online grooming, social networking, gaming, video chats and web cams.

### **5.0 Responsibilities**

#### **5.1 Governing Body.**

Ensuring that the GEL is a safe and secure environment is the responsibility of the Board of Directors. On an annual basis the Safeguarding Policy should be reviewed. The Governance Committee should ensure that GEL operates safe recruitment procedures and is confident that GEL has procedures in place for

dealing with allegations. The Governance Committee will receive from the Designated Safeguarding Lead an annual report which reviews how the duties have been discharged, including but not limited to the training staff have undertaken. Training will also be provided to Directors on a regular basis.

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

The Designated Safeguarding Lead for Gloucestershire GEL is **Kevin Holt**, Managing Director. The deputy safeguarding lead is **Michaela Cozens**, Operations Director.

The Designated Safeguarding Lead has an amendment to their job description outlining their responsibilities. The key responsibilities are:

- Promote positive safeguarding procedures and practice
- Receive information and offer advice about safeguarding concerns, maintain secure records and take appropriate action.
- Be familiar with national and local safeguarding guidance and referral procedures
- Assess the development needs of staff and coordinate training through the learning and development team.
- Keep staff and volunteers informed of good practice development monitor safeguarding cases in the organisation
- Report to the Governing Body on an annual basis on how GEL has met the statutory duties
- Develop working relationships with other agencies.
- Be regularly and appropriately trained
- Be specialist trained in supporting mental health issues
- Monitor and update the Prevent Risk Assessment Action Plan
- Hold at least a Level 2 Award in Safeguarding (Prevent Strategy) or Level 3 Award for Designated Safeguarding Officer

## **6. Monitoring Process**

**6.1** The Designated Safeguarding Lead will provide an annual report to the Board of GEL setting out how GEL has discharged its duties. He/she is responsible for reporting deficiencies in procedure or policy identified by the Local Safeguarding Children Board (or others) to the Board at the earliest opportunity.

## **7. Prevent**

**7.1 PREVENT Procedure: Detecting and Preventing Radicalisation and Extremism**

### **Background**

PREVENT is part of the Home Office and the Police counter-terrorism strategy and aims to stop people from becoming terrorists or supporting terrorism by working with individuals and communities to prevent the radicalisation of people and to stop people moving from extremism into terrorist-related activity.

### **Context**

Young people in the UK are potentially vulnerable to engagement with extremist ideologies or to targeting by extremist organisations. As an organisation that interacts with young people, GEL ensures that staff and Learners are aware of these risks and

are familiar with the support networks and processes in place to protect vulnerable individuals from becoming radicalised or drawn into terrorism.

### **GEL Procedure**

GEL has developed internal support mechanisms and referral procedures. This procedure outlines who staff and Learners should contact to report any concerns about fellow staff or Learners. GEL staff will be trained in Safeguarding and Prevent, and this will be refreshed annually.

GEL will promote awareness of Safeguarding and Prevent responsibilities at Induction and during learner review meetings. Trainers will embed Safeguarding and Prevent within their training sessions and posters will be displayed within the Training Centre advising learners and staff of the Designated Safeguarding Lead contact details.

GEL will make employers aware of Safeguarding and Prevent responsibilities during the initial engagement meeting and will inform employers of the Designated Safeguarding Lead contact details.

GEL has developed links with external agencies that provide training and support. If, once internal processes are completed, it is considered that additional external support or referral is required, this will be arranged via the Designated Safeguarding Lead or Deputy Safeguarding Lead, whichever is most appropriate. External support will normally involve an individual being asked to voluntarily receive tailored support from appropriate external individuals or organisations.

### **Definition of Radicalisation**

The Institute of Strategic Dialogue defines radicalisation as “the process through which an individual change from passiveness or activism to become more revolutionary, militant or extremist, especially where there is intent towards, or support for, violence”. Driving factors behind radicalisation can include:

- Lack of integration and/or polarisation
- Identity crises and/or isolation
- Political and/or democratic disenfranchisement
- Discrimination
- Foreign policy and/or international crises or disputes
- Political movements
- Ideologies and/or faiths

### **Who are we safeguarding?**

There is no stereotype for people who hold extremist views. Vulnerability, isolation and personal grievances added to strong political, religious or social views, can result in a person searching for a cause. People can become vulnerable for many reasons including:

- Low self-esteem
- Guilt
- Loss
- Isolation
- Family breakdown
- Fear
- Lack of purpose
- Anger
- Peer pressure
- Indoctrination

We are by no means suggesting that one or all of these characteristics or circumstances will drive someone to terrorism. But they often lead to a sense of injustice – be that on a personal or more far reaching scale. Their vulnerabilities or susceptibilities are then exploited towards crime or terrorism by people who have their own agenda.

There is no typical gender, age, religion or background that extremists will target but they use a sense of “Duty” (belonging to a specific group), “Status” (need for reputation) and “Spiritual Rewards” (test of faith) as a way of drawing vulnerable individuals in.

This raises the question of what will those signs of radicalisation look like. They will often look a lot like adolescent troubling behaviour:

|                  |   |
|------------------|---|
| <b>Emotional</b> | Angry, mood swings, new found arrogance, perceived sense of injustice, sense that other people are “wrong”                                  |
| <b>Verbal</b>    | Expressing opinions that are at odds with generally shared values, language, phrases and ways of speaking/writing not previously seen/known |
| <b>Physical</b>  | Appearance (tattoos), change in routine, dress, new obsessions and pre-occupations  |

#### **What to do if you believe someone to be at risk of radicalisation**

GEL will adopt the ethos of “Notice, Check, Share” where there are concerns that an individual may be vulnerable. This is the ethos promoted by Gloucestershire Police Prevent team.

|               |  |
|---------------|--|
| <b>Notice</b> | Recognition of any changes in behaviour or appearance similar to those outlined above  |
| <b>Check</b>  | Speak with someone you trust (like a tutor/colleague) and see what they recommend but trust your instinct if you are still concerned |
| <b>Share</b>  | Speak to one of the safeguarding officers to report your concerns.<br>Remember –trust your instinct                                  |

If you are a Learner and concerned about another Learner, please **Check** with your tutor in the first instance and **Share** with the Safeguarding Team.

If you are a Learner and are concerned about a member of staff, or a person who is not a member of GEL, e.g. guest speakers, please **Check** with the Safeguarding Team and **Share** with the Managing Director.

If you are a member of staff and are concerned about a Learner, please **Check** and **Share** with the Safeguarding Team or your line manager.

If you are a member of staff and are concerned about another member of staff please **Check** with your Line Manager and **Share** with the Managing Director

If you are a member of staff and are concerned about a person who is not a member of GEL, e.g. a guest speaker, please **Check** and **Share** with the Safeguarding Team

#### **Responsibility for contacting PREVENT**

Any of the following people are responsible for making decisions to contact the Counter Terrorism Team at Gloucestershire Police if serious concerns are raised about a Learner:



Designated Safeguarding Lead  
Designated Safeguarding Officer

Any of the following people are responsible for making the decision to contact the Counter Terrorism Team at Gloucestershire Police if serious concerns are raised about a member of staff:

**Kevin Holt**  
**Michaela Cozens**

Any of the following people are responsible for making the decision to contact the Counter Terrorism Team at Gloucestershire Police if serious concerns are raised about a person who is not a member of GEL, e.g. a guest speaker:

**Kevin Holt**  
**Michaela Cozens**

NB. As outlined in Keeping Children Safe in Education (September 2021), anyone has the right to refer to Social Care regarding any concerns for an individual. GEL confers this right with regards to extremism and anyone can report a concern to Gloucestershire Police by dialling 101. Where this does occur, please inform the Managing Director with regard to a Learner or member of the public who visits GEL or a member of staff.