

Safeguarding and Prevent Procedure



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Key Contacts

| Safeguarding Responsibility | Role | Name and Contact |
|-----------------------------|--|--|
| DSL | DSL and named child protection GC Education and Skills | Julie Gillies Julie.gillies@gceducationandskills.ac.uk |
| Deputy DSL | Quality Director Education and Skills | Helen.Stevenson-Miller@gceducationandskills.ac.uk |
| DSO | Quality and Compliance Lead/DSL (BSBF) | Justine Booth |
| DSO | DSO – Enterprise Area (BSBF) | Yvonne Sampson |
| Deputy DSL | Deputy DSL (BSBF) | David Connolly |

| | |
|--|---|
| The Local Authority Designated Officer LADO for Manchester City Council | qualityassurance@manchester.gov.uk Tel: 0161 234 1214 |
| Manchester Children’s Services Children's services | to report abuse, neglect or a vulnerable person at risk – 0161 234 5001 Homelessness, if you have nowhere to stay at night - 0161 234 5001 |
| Immediate Danger | 999 |
| Out of Hours Service – (evenings, weekends, holiday periods and GC closure days) | Contact Child Action Northwest - 01254 244595 |

GC Education and Skills: Safeguarding Procedure

Introduction

At The Growth Company we believe everyone has a responsibility to promote the welfare of all children and young people, to keep them safe and to practise in a way that protects them. We recognise our moral, statutory, and legal responsibility to safeguard and promote the welfare of all students within their entire learning environment, extended to work placement and/or employment and any educational trips/visits as part of their learner journey with us. We are committed to anti-discriminatory practice, and we will give equal priority to keeping all children and young people safe regardless of their age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation. The purpose of this Safeguarding and Prevent Procedure is to provide a clear direction to staff and others about the expected behaviour when dealing with safeguarding and child protection issues. This ensures that safeguarding concerns, referrals, and monitoring are handled sensitively, professionally and in ways which support the needs of all children, young people, or a vulnerable adult. Our approach to Safeguarding aligns with our organisational values and our practices that are underpinned by the core principles:

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

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

- Valuing, listening to, and respecting their voice.
- Maintaining and supporting the Safeguarding Panel and Designated Safeguarding Officers (DSO)
- promoting a culture of Safeguarding and Equality, Diversity, and Inclusion by embedding British Values into the curriculum, IAG and wider services and preparing participants for life in modern Britain
- Ensuring all colleagues receive appropriate training.
- Recognising that certain participants (e.g., young people and adults at risk) may be at a greater risk of harm including radicalisation or being drawn into terrorism and taking steps to identify and support them.
- Implementing an effective e-safety policy and procedure and guidance
- Using our procedures to share concerns and relevant information with agencies such as the Local Authority Designated Officer (LADO), the Police, local authority children's social care services or other relevant external agency, parents, families, and carers appropriately with the involvement of the participant, via the reporting procedure.
- Contributing to pre-existing external plans that are in place that help reduce the risk of harm or actual harm and regularly review these with relevant agencies, as appropriate.
- Adopting a zero-tolerance approach to bullying, including cyber bullying, and ensuring our procedure is effective in dealing with any bullying that does arise.

- Adopting a zero-tolerance approach to sexual violence and harassment, providing colleagues with the tools to address through bespoke training.
- Ensuring that we have effective whistleblowing procedures in place.
- Ensuring that we provide a safe physical environment for all, by applying health and safety measures in accordance with the law and regulatory guidance.
- Reviewing this policy and associated procedure at least annually to ensure compliance with legislation and safeguarding best practice.

1:1 Legal Framework

This Policy has been drawn up based on the law and guidance that seeks to protect young people and adults at risk. See Appendix 1: The Legislative Framework

1:2 Supporting Documents

This policy statement should be read alongside our organisational policies, procedures, guidance, and other related documents. See Appendix 2.

1:3 Definitions

The following definitions apply throughout the policy and associated procedures:

Child or Children: The Children Act 2004 defines a child as a person under the age of eighteen.

Vulnerable Adult or Adults: The Safeguarding Vulnerable Groups Act 2006 defines a vulnerable adult as a person aged 18 or over who has a condition of the following type:

- a substantial learning or physical disability
- a physical or mental illness or mental disorder, chronic or otherwise, including addiction to alcohol or drugs.
- a significant reduction in physical or mental capacity.

Looked after child (LAC)

Refers to all children and young people being looked after by a local authority. 'When a local authority takes on the responsibility of a parent, so children are kept safe and get what they need'.

The Growth Company has a designated staff member who will lead in promoting achievement and progression of every LAYP, they will ensure that their personal, emotional wellbeing and academic needs are prioritised and met, they will attend all LAYP review meetings and Personal Education Plan's (PEP), to fit into the wider care planning duties of the authority which looks after the child.

Additional Vulnerabilities

The GC recognises the importance of identifying vulnerable students that may be at risk of abuse, or that may have additional support needs. The Growth Company recognises the following as vulnerable groups (although not exclusively):

- Students with Special Educational Needs and Students with Disabilities
- Students with emotional/behavioural/attachment disorders
- Students with caring responsibilities or classified as a young carer.
- Looked after children and those subject to private fostering arrangements
- Students missing education/low attendance
- Students dealing with issues around domestic abuse
- Students from Gypsy, Roma, Traveller communities

- Students experiencing bereavement
- Students in receipt of FSM or PPG
- Students at risk from neglect; physical; sexual and emotional abuse
- Students who may be at risk of child-on-child abuse, sexual harassment, and or abuse
- Students at risk of exclusion
- Students at risk from bullying, including online bullying and prejudice-based bullying
- Students at risk from the impact of new technologies on sexual behaviour, for example sexting
- Students at risk of female genital mutilation (FGM)
- Students at risk of being drawn into terrorism and radicalisation
- Students at risk of exploitation, sexual exploitation and trafficking
- Students at risk of honour-based violence or forced marriage
- Students affected by substance misuse (drugs, alcohol)
- Students affected by mental health issues
- Students affected by gender-based violence or violence against women and girls
- Students affected by fabricated or induced illness
- Students affected by issues around bullying.
- Students affected by gang activity or crime.
- Students affected by issues relating to gender identity or sexuality (LGBT).

For key safeguarding categories and terms See Appendix 3: Safeguarding glossary.

Roles, Responsibilities and Accountability

All staff (identified on the single central record) and governors must read part one of 'Keeping Children Safe in Education', September 2023 – Part One

All colleagues and subcontractor colleagues:

- Have a duty to act to ensure that the welfare of the GC participants is paramount.
- Have a responsibility to provide a safe environment to access our services.
- Have a responsibility to report any emerging concerns in line with the reporting procedure.
- Should promote safeguarding and familiarise themselves with the Safeguarding policy and associated procedures.
- Must report any change in their personal circumstances (for example the committing of an offence) that may call into question their suitability to work with children and adults at risk.
- Must undertake relevant Safeguarding and Prevent training.
- Report any participants who go missing from programmes and fail to make contact, so that appropriate welfare checks can be made.

GC will ensure that all subcontractors' safeguarding arrangements are checked as part of the due diligence. Partners and subcontractors are required to notify the Growth Company if they identify anything under the terms of this policy. The GC team will then work with the partner/subcontractor to investigate and deal with the issue.

2.1 The CEO and Senior Leadership Team (SLT)

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

current legislation and statutory guidelines, including our legal responsibility to fulfil the Prevent Duty Statement. Safeguarding arrangements are overseen at the most senior level by the GC Group Board, Workforce Development Advisory Board (WFDAB), GC – Education and Skills Sub-Board and CEO of GC.

2.2 Designated Safeguarding Lead (DSL)

It is the role of the DSL to ensure all safeguarding procedures are followed within the Growth Company, and to make appropriate, timely contact with the regional Prevent Officer, in cases of suspected extremism and radicalisation under the Prevent Strategy, in accordance with The Growth Company procedures. If a student resides out of the area, it is the responsibility of the DSL to contact the appropriate child protection team for that authority and follow their procedures on how to make a referral. If, for any reason, the DSL is unavailable, a Designated Safeguarding Officer (DSO) is identified who will act in the absence of the DSL. Additionally, it is the role of the DSL supported by HR to ensure all staff employed, including temporary staff and volunteers within the College, are aware of the College's internal safeguarding procedures, to advise staff on safeguarding related matters and to offer support to those requiring this. A full description of the duties of a DSL can be found in part One KCSIE, Sept 2024 (refer to Appendix 4).

2.3 The Safeguarding Action Group

The Safeguarding Action Group comprises of the Safeguarding Panel and all Designated Safeguarding Lead (DSL), Designated Safeguarding Officers with representatives from support across-GC services such as Health and Safety and HR. The Action Group meets at least quarterly MS Teams to:

- Review and monitor the effectiveness of the safeguarding strategy, changes to legislation/guidance, policy, and procedures, discuss patterns and trends and reported incidents and outcomes.
- Promote, share, and support effecting safeguarding practice.
- Discuss national policy and practice development, as well as feedback from relevant serious case reviews.
- Monitor and evaluate safeguarding training
- Disseminate feedback from meetings to managers and teams as appropriate.

2.4 The Designated Safeguarding Lead for Education & Skills

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

2.5 Centre Managers and Designated Safeguarding Officers (DSO)

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

- Capacity and confidence building of all colleagues to identify and appropriately handle a wide range of safeguarding issues.
- Ensuring that appropriate action is agreed and taken to deal with safeguarding issues including reporting all incidents in line with GC safeguarding procedures.

- Ensuring colleagues adhere to this Safeguarding Policy and take responsibility for being vigilant and acting quickly and appropriately in the event of any safeguarding concerns.
- Ensure that all staff abide by the GC Professional Boundaries where safeguarding children, young people and vulnerable adults is at the heart of their duties. Staff know how to respond with clear boundaries about what is safe and acceptable, and they seek to understand triggers for behaviours. Staff are encouraged to maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Ensuring that all colleagues undertake mandatory training.
- Promoting our culture of Safeguarding with colleagues and participants
- Ensuring the embedding of safeguarding and British Values into the curriculum and/or service delivery
- Ensuring employers who we work alongside, and any subcontractors are made aware of their safeguarding responsibilities.

2.6 The Managing Director of HR

Will ensure that the Safer Recruitment Policy and Process is in place (in line with part three of Keeping Children Safe in Education and the DBS guidance), communicated to all hiring managers and its implementation monitored, in addition:

- Provide training on Safer Recruitment procedures and processes to all hiring managers and ensure at least one person on any appointment panel has undertaken safer recruitment training
- Ensure that all right to work documentation is correct and in place prior to offer of employment
- Ensure that the DBS Policy and Procedures for Safer Recruitment are followed and any disclosures are referred to the panel for approval and actioned accordingly
- Ensure that the Single Central Record is suitable and is audited annually
- Ensure that any safeguarding or abuse allegations raised about members of staff raised are dealt with appropriately, thoroughly and follow policy and process, including referral to the DSL to enable reporting to the LADO, DBS and the Police (where required)
- Ensure that any referrals to LADO or DBS are recorded and tracked
- Ensure that IT policies are in place to address the safety of students in mistakenly or intentionally accessing inappropriate material when using the internet and that appropriate filtering, monitoring and reporting systems are in place

2.7 Policy Review

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

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

Safer Recruitment

Keeping Children Safe in Education sets out clear guidance for schools, which is adhered to at this Education and Skills provision. The Growth Company will comply with the guidance set out in Part 3 of Keeping Children Safe in Education.

Types of check

Disclosure and Barring Service (DBS) checks Three types of DBS checks are referred to in this guidance:

Standard: this provides information about convictions, cautions; reprimands and warnings held on the Police National Computer (PNC), regardless or not of whether they are spent under the Rehabilitation of Offenders Act 1974. The law allows for certain old and minor matters to be filtered out.

Enhanced: this provides the same information as a standard check, plus any additional information held by the police which a chief officer reasonably believes to be relevant and considers ought to be disclosed; and

Enhanced with barred list check: where people are working or seeking to work in regulated activity with children, young people, and vulnerable adults. This allows for an additional check to be made as to whether the person appears on the children's barred list.

All staff working within the GC who have substantial access to children, young people, and vulnerable adults, have been checked as to their suitability to work within the provision. This included verification of their identity and qualifications, satisfactory references, a satisfactory barred list check, an enhanced DBS check, a right to work in the UK check, and additional overseas checks for those who have lived or worked abroad. For teachers, an additional check has been carried out to ensure they are not prohibited from teaching. Governors have a DBS check, and it will be the responsibility of the Growth Company to apply for the certificate if a Governor does not have one. Governors who also undertake regulated activity must have an Enhanced DBS with barred list check. A check of any prohibition orders will be carried out using the Teacher Services System to determine if there is a prohibition order which would prevent a person from carrying out teacher work in the GC.

Once the DBS checks are complete, the DBS will send a certificate (the DBS certificate) to the applicant. The applicant must show the original DBS certificate to their potential employer before they take up post or as soon as practicable afterwards. Where the GC allows an individual to start work in regulated activity before the DBS certificate is available, the GC ensures that the individual is appropriately supervised and that all other checks, including a separate barred list check, have been completed.

All appointments are verified by Director of HR & Support Services, who has undergone Safer Recruitment training. It is College policy to have at least one person conducting an interview to have completed safer recruitment training.

A Single Central Record of employment checks is held by the GC and checked termly by the Director of HR & Support Services. The Single Central Record must cover the following people:

- All staff (including temporary staff, and teacher trainees) and those providing education to children aged under 18.
- All others who work in regular contact with children under 18 in the College, including volunteers, contractors, and agency staff.

The information that is recorded in respect of staff members (including teacher trainees) is whether the following checks have been carried out or certificates obtained, and the date on which each check was completed/certificate obtained:

- An identity check
- A barred list check

- An enhanced DBS check/certificate
- A prohibition from teaching check

Professional boundaries for staff and code of conduct

Each new member of staff and volunteer will be provided with a full induction on Safeguarding, in addition to the training requirements set out in Appendix 4: Safeguarding Code of Conduct for Staff.

A copy of 'Guidance for Safer Working Practice for Adults Who Work with Children and Young People' will be available for all staff and volunteers to read. All staff are to complete 'Keeping Children Safe in Education' training during their probation. The GC Code of Conduct for staff and volunteers is made freely available to staff, visitors, contractors, pupils, parents, and carers on the GC website and in hard copy, at request. This allows everyone to understand our expectations of our staff and to be able to identify any behaviour that may be inappropriate.

The use of social networking sites by staff is viewed in connection with the GC Code of Conduct, this policy, and social media Policy. All College staff are in a position of trust, and there are expectations that they will always act in a professional manner.

Safeguarding for Participants

All participants are provided with information about safeguarding through inductions, marketing materials, share point and VLE systems and that students and staff know the staff within the College whom they can approach if they are worried or in difficulty. This will establish and maintain an environment where students and staff feel safe and secure and are encouraged to talk, and where any concerns are listened to.

Our Observation Processes include Safeguarding 'walk throughs' at our centres and offices where there is an opportunity to discuss safeguarding with participants, this is undertaken in Education and Skills via the 'Deep Dives.' Performance observations undertaken by management also record any safeguarding concerns.

5:1 Students at Risk

The Growth recognises the importance of identifying vulnerable students that may be at risk of abuse, or that may have additional support needs. We recognise that a student may be classed as vulnerable for a variety of reasons, and this may not be permanent. The Growth Company will support them through:

- The curriculum to encourage self-esteem and self-motivation.
- The College ethos which promotes a positive, supportive and secure environment and which gives all a sense of being respected and valued.
- The implementation of the GC behaviour management policies
- The Student Code of Conduct
- Regular liaison with other professionals and agencies that support the student and their families.
- A commitment to develop productive, supportive relationships with parents, whenever it is in the student's best interest to do so.
- The development and support of a responsive and knowledgeable staff group, trained to respond appropriately in safeguarding situations.
- Recognition that, statistically, students with behavioural difficulties and disabilities are most vulnerable to abuse so staff who work in any capacity with students with profound and

multiple disabilities, sensory impairment and/or emotional and behavioural problems, will need to be particularly sensitive to signs of abuse.

- Recognition that in a home environment where there is domestic violence, drug abuse or alcohol abuse, individuals may also be vulnerable and in need of support and/or protection.
- The GC recognises it may be the only stable, secure, and predictable element in the lives of vulnerable children, young people and vulnerable adults and that whilst on program their behaviour may still be challenging and defiant or they may be withdrawn.

Safeguarding Recording, Reporting & Confidentiality

Confidentiality is an issue which needs to be discussed and fully understood by all those working with children, young people, and vulnerable adults particularly in the context of safeguarding. The only purpose of confidentiality in this respect is to benefit the individual. A member of staff must never guarantee confidentiality to a student, nor should they agree with a student to keep a secret. Where there is a safeguarding concern, this must be logged onto the safeguarding platform CURA and reported to the Designated Safeguarding Officer and may require further escalation to the DSL or investigation by the appropriate authorities. Students can be reassured that only the people who 'need to know' will be informed, that this will be the minimum necessary and that information will not become common knowledge.

Staff will be informed of relevant information in respect of individual cases regarding safeguarding on a 'need to know' basis only. Where information is shared with appropriate staff, they must maintain the confidentiality outlined above.

6:1 Disclosures

Any member of staff receiving a disclosure of abuse, or noticing signs or indicators of abuse, must make an accurate record as soon as possible, noting what was said or seen, putting the event in context, giving the date, time, and location. All records will be dated, signed, and will include the action taken. Making the record should not delay referring the disclosure to the DSL or appropriate authority. These notes must be uploaded in the safeguarding platform CURA. In the same way, notes must be kept of any student who is being monitored for safeguarding reasons. If a student transfers from the Growth Company these files, where appropriate, will be forwarded to the new provider marked 'confidential' and for the attention of the organisation's DSL. The DSL will have oversight of the College's record management policy to ensure that issues around safeguarding records are addressed appropriately. See Appendix 4: Guidance for handling disclosure.

6:2 Safeguarding Platform

CURA is the primary reporting mechanism for Safeguarding Concerns and Disclosures in GC. For information on how to use the CURA system please contact your Designated Safeguarding Officer. All staff will receive training and regular updates on CURA. Staff are expected to respond to any actions assigned to them within the required time frame and upload any relevant documentation in relation to the safeguarding support of a student.

6:3 Record Keeping and Data Processing

Well-kept records are essential to good safeguarding practice. The Growth Company is clear about the need to record any concerns held about a student, the status of such records and when these records should be passed over to other agencies. Records are kept on Cura and monitored by the DSL weekly and maintained in safeguarding records. All records concerning a participant's welfare will be clear, use straightforward language, be concise, accurate in fact and stored confidentially and

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

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

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

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

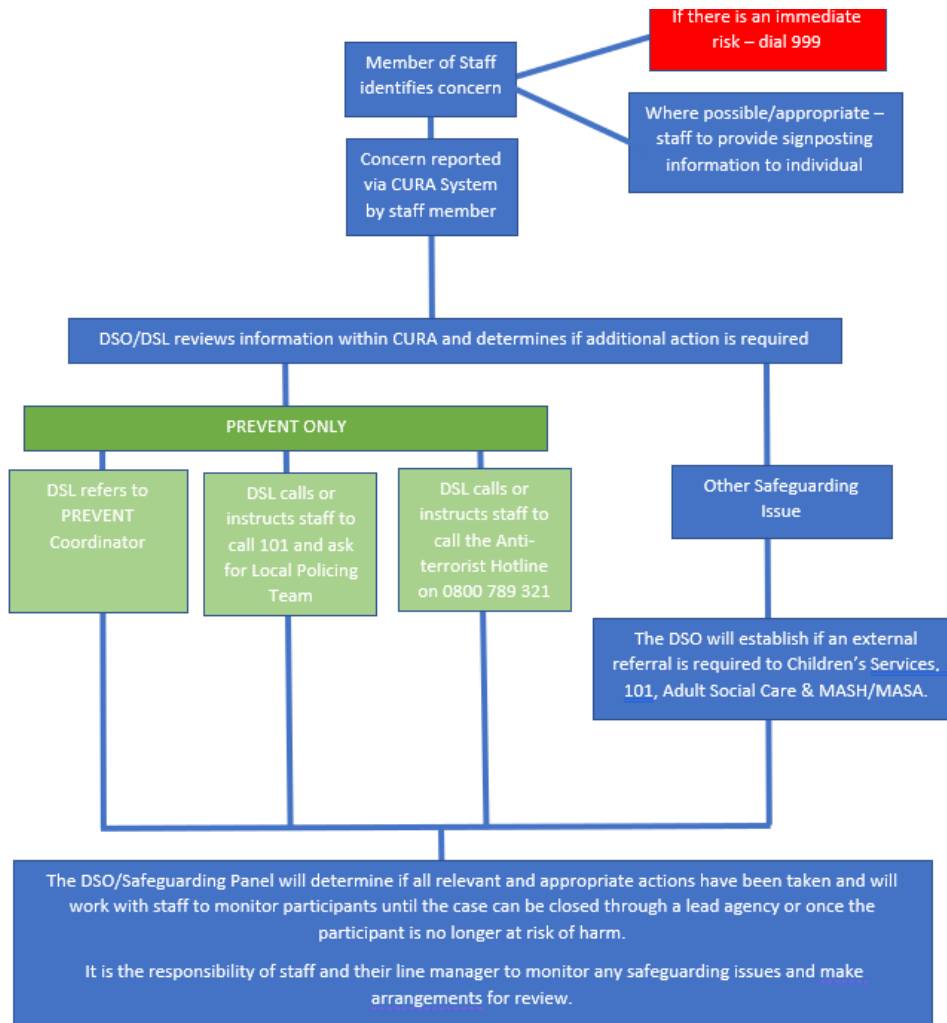
The legal requirement for processing sensitive personal data where consent is not expressly provided, is necessary for the safeguarding of children and of individuals at risk.

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

See Appendix 6: The 7 Golden Rules of Information Sharing

6.4 Reporting Flowchart – target to action within 1 working day

If there is an immediate risk, dial 999.



6:5 Information Sharing and Referral

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

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

To effectively share information:

- All Designated Safeguarding Officers should be confident of the processing conditions which allow them to store and share the information that they need to carry out their safeguarding role. Information which is relevant to safeguarding will often be data which is considered special category personal data meaning it is sensitive and personal.

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

6:6 Attendance at child protection and safeguarding meetings

The DSL and DSOs will ensure that GC Education and Skills is represented, and a report is submitted to any Child Protection Conference or Team Around the Child meeting called for students on their roll or previously known to them. Whoever attends should be fully briefed on any issues or concerns. The Growth Company should be part of core groups for children subject to child protection plans. Core Groups meet regularly to review and update Child Protection Plans, and the DSL or DSO will ensure that the GC is represented at these meetings and that records of the meetings are kept. When a student is made subject to a Child Protection Plan, it is the DSL's responsibility to ensure that the child is monitored regarding attendance, welfare, presentation, and achievement. The lead professional will be informed if there is an unexplained absence of two or more days of a student who is subject to a Child Protection Plan. The GC will engage with Child Protection Conferences, Core Group Meetings and Team Around the Child meetings as appropriate.

6:7 Whistleblowing

The Growth Company's (GC) Whistleblowing Policy is a vital element of our anti-fraud, corruption and governance arrangements and our commitment to prevent and detect cases of fraud, or other irregularity. Individual members of staff have a right and a duty to raise matters of concern which they may have about the services provided by GC. A designated Whistleblowing Officer deals with any concerns raised by a GC employee, subcontractor, participant, or member of the public. Such investigations can include safeguarding concerns, health and safety risks, potential environmental problems, fraud, corruption, for example.

Concerns can be reported confidentially via:

- E-mail your concerns to Whistleblowing@growthco.uk
- Report by telephone: Internal Audit on 07789961216
- Group CEO on 0161 245 478

6.8 Allegations Against Colleagues and Volunteers

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

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

- Behaved in a way that has harmed or may harm or indicates they may pose a risk of harm to a child or adult at risk.

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

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

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

The procedures for dealing with allegations need to be applied with common sense and judgement. Many cases may well either not meet the criteria set out above or may do so without warranting consideration of either a police investigation or enquiries by local authority children's social care services.

6.9 The Difference Between an Allegation and a Concern

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

7.0 Managing Allegations

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

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

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

Reporting to DBS

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

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

The person should be referred if they have:

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

Online Safety

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

The [GC Social Media Policy](#) and the [Code of Conduct](#) for colleagues outline expected usage of IT by colleagues.

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

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

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

8:1 Indecent Images and Online Grooming

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

The URLs (web page addresses) which contain the suspect images should be reported to the Internet Watch Foundation via www.iwf.org.uk by the DSL. You must avoid sending copies of the images to the Internet Watch Foundation.

Any copies that exist of the image, for example in emails, should be deleted.

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

This should be referred to the DSL immediately.

The DSL will then:

- Report the URLs (web page addresses) which contain the suspect images to the Internet Watch Foundation via www.iwf.org.uk. They will avoid sending copies of the images to the Internet Watch Foundation.
- Inform the police and complete any information requested.

- If any copies need to be stored at the request of the police, then they should be stored securely where no one else has access to them.
- All other copies must be deleted.

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

This should be referred to the DSL & Director of HR immediately. They will be aware of their obligations under the Sexual Offences Act 2003 (England and Wales) and the associated Memorandum of Understanding. The DSL & HR BP or Director of HR will then:

- Contact the police regarding the images. If you are in doubt about whether the images are criminal, then discuss with the police the best way for them to receive copies to determine whether they are criminal or not.
- Discuss with the police what to do about the device that the images are on.
- Quarantine the device in question and discuss with the police about checking for any other images on that machine.
- Follow the management of allegations procedures including an initial discussion with the police to consider temporary suspension of the colleague/volunteer pending investigation.

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

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

Physical Security & Safeguarding

Office and Premises Security

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

External Speakers

Please refer to the policy on the [Company SharePoint](#)

9:1 Prevent: Radicalisation & Extremism

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

During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media has become a major factor in the radicalisation of young people.

As with managing other safeguarding risks, staff should be alerted to changes in young people's behaviour which could indicate that they may need help or protection. GC staff should use their professional judgement in identifying young people who might be at risk of radicalisation and act proportionately. Staff will receive annual Prevent training and will complete new starter e-learning Prevent training.

Link to [Prevent Duty Guidance](#)

From 1 July 2015 specified authorities, including all schools and Colleges (as defined in the summary of Keeping Children Safe in Education), are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015, ('the CTSA 2015'), in the exercise of their functions, to have 'due regard to the need to prevent people from being drawn into terrorism' ("the Prevent duty"). Bodies to which the duty applies must have regard to statutory guidance issued under section 29 of the CTSA 2015 ('the Prevent guidance')

The statutory Prevent guidance summarises the requirements on further education institutes in terms of seven general themes: external speakers and events, working in partnership, risk assessment, action plans, staff training, welfare and pastoral care and IT policies.

Channel [Channel and Prevent Multi-Agency Panel \(PMAP\) guidance - GOV.UK \(www.gov.uk\)](#)

All staff should understand when it is appropriate to make a referral to the Channel programme. Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for organisations to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages.

The Safeguarding Policy

The Prevent strategy addresses all forms of terrorism and the government continues to prioritise according to the threat they pose to national security. The most significant of these threats is currently from terrorist organisations in Syria and Iraq, and Al Qaida associated groups. But terrorists associated with the extreme right also pose a continued threat to our safety and security. 17.6 The Prevent strategy has three specific strategic objectives:

- Respond to the ideological challenge of terrorism and the threat we face from those who promote it
- Prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support, and
- Work with sectors and institutions where there are risks of radicalisation that we need to address.

17.7 The Counterterrorism and Security Act 2015 also places a duty on local authorities to ensure Channel Panels are in place. The panel must include the local authority and chief officer of the local police. Panels will assess the extent to which identified individuals are vulnerable to being drawn into terrorism, following a referral from the police and where considered appropriate and necessary consent is obtained, arrange for support to be provided to those individuals. [Counter-Terrorism and Security Act - GOV.UK \(www.gov.uk\)](#)

9:2 Information Sharing and Referral

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

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

To effectively share information:

- All Designated Safeguarding Officers should be confident of the processing conditions which allow them to store and share the information that they need to carry out their safeguarding role. Information which is relevant to safeguarding will often be data which is considered special category personal data meaning it is sensitive and personal.
- Where there is a need to share special category personal data, they should be aware that the Data Protection Act 2018 includes safeguarding of children and individuals at risk as one of conditions that the sharing of information with others without consent.
- Information can be shared legally without consent, if GC is unable to, or cannot be reasonably expected to gain consent from the individual, or if to gain consent could place an individual at risk.
- Relevant personal information can also be shared lawfully if it is to keep an individual at risk safe from neglect or physical, emotional, or mental harm, or if it is protecting their physical, mental, or emotional well-being.

Key Contacts for Prevent

- We celebrate a positive working relationship with local Prevent coordinators who supplies us with updates, training and support to ensure we are updated with the Prevent Duty. [Regional Prevent coordinators - GOV.UK \(www.gov.uk\)](#)
- Our Local Authority children and adult safeguarding services, referrals to be made over the phone or via their online system.
- Anti-Terrorist Hotline - 0800 789 321
- www.met.police.uk (To complete a confidential on-line form)
- Channel is the safeguarding process for children, young people and adults at risk of being drawn into terrorism or extremism leading to terrorism – referrals are made by the Multi-Agency Safeguarding Hubs/Panels.

Appendix 1: The Legislative Framework

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

- [Keeping Children Safe in Education](#)

It is crucial **all colleagues** are familiar with the contents of Part 1 and, where appropriate, Annex A.

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

- [The Children Act](#) and [‘Every Child Matters’](#) (1989 and 2003)
- [UN Convention on the Rights of the Child](#) (1989)
- [Safeguarding Vulnerable Groups Act](#) (2006)
- [Working Together to Safeguard Children – statutory framework](#) (July 2018)
- [Ofsted Further Education and Skills Handbook \(March 2023\)](#)
- [Inspecting safeguarding in early years, education and skills settings](#) (Sept 2022)
- [Female Genital Mutilation Act](#) (2003)
- [The Equality Act](#) (2010)
- [Protection of Freedoms Act 2012](#)
- [Data Protection Act](#) (2018) (particularly Schedule 8)
- [Modern Slavery Act](#) (2015)
- Section 115(4) of the Police Act (1997)
 - [The Police Act 1997 \(Enhanced Criminal Record Certificates\) \(Protection of Vulnerable Adults\) Regulations 2002](#)
- [The Sexual Offences Act](#) (2003)
- [Safer Practice, Safer Learning](#) (DfE)
- [Care Act](#) (2014)
- [No Secrets: Guidance on developing and implementing multi-agency policies and procedures to protect vulnerable adults from abuse](#) (last updated 2015)
- [The Mental Capacity Act](#) (2005) and [The Mental Capacity \(amendment\) Act](#) (2019)
- [Disclosure and Barring Service](#) (Gov.UK)
- [The Human Rights Act](#) (1998)
- [The Counter Terrorism and Security Act](#) 2015
- [Work Based Learners and the Prevent Statutory Duty](#) DfE May 2021
- [CONTEST - the United Kingdom’s Strategy for Countering Terrorism](#) (June 2018)
- [The Prevent Duty Guidance for Further Education](#) (updated April 2021)
- [The Channel Duty Guidance](#) (2015)
- [The Education and Training \(Welfare of children\) Act 2021](#)
- [OFSTED Review of Sexual Abuse in Schools and Colleges 2021](#)

Appendix 2– Supporting documents - Linked GC Policies

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

- [GC \(HR\) Recruitment and Selection Procedure](#)

- [Pre-employment or engagement checks - Manager Guidance.docx \(sharepoint.com\)](#)
- [Guidance on DBS Checks for GC Education Skills Staff.docx \(sharepoint.com\)](#)
- [DBS Employment Check Register April 2023.xlsx \(sharepoint.com\)](#)
- [GC Anti-Slavery and Human Trafficking Policy](#)
- [GC Modern Slavery Reporting Procedure](#)
- [GC Whistleblowing Policy](#)
- [Dignity at Work Policy](#)
- [GC Social Media Policy](#)
- [GC Group Health and Safety Policy](#)
- [GC Physical Security Policy](#)
- [GC Equality and Diversity Policy](#)
- [GC Complaints Procedure](#)
- [GC Subcontractor Process](#)
- [Acceptable use of IT for Participants](#)

Appendix 3: [Safeguarding Glossary](#)

Appendix 4: Safeguarding Code of Conduct for Colleagues

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

Guidelines

Colleagues should avoid the following situations:

- Sharing personal information and/or providing participants with their own personal contact details.
- Discussing personal details of self or other colleagues or participants - be aware of being overheard.
- Correspondence being shared of a personal nature via any medium.
- Adopting an on-going support or welfare role, beyond the scope of your job role.
- Photographing, audio recording or filming participants via any medium without clear prior agreed purpose and obtaining or checking consent received.
- Spending time alone with participants, away from others. Meetings with individual participants should, wherever practicable, take place within sight of others. If privacy is needed, then either the door should remain slightly ajar or a room with a glass door or window should be used or inform a colleague of the meeting.
- Making unnecessary unwarranted physical contact with participants. There may be occasions when physical contact is unavoidable, e.g., medical emergency.
- Offering or providing transport in a private vehicle, however short the journey. Where this is unavoidable (emergency), it should be with the full knowledge and consent of the parents (or

guardians/carer), if possible, for those participants aged under 18. A senior colleague should be made aware of the journey and reason including time and location, in the absence of a senior manager, a member of the Safeguarding team. Wherever possible, another colleague should accompany the car journey.

- Arranging to meet a participant outside of the GC environment or events.
- Showing favouritism to any one participant, nor should they issue or threaten any form of physical punishment.
- Frequent use of terms such as buddy, mate, pal, friend as these may give confusing messages to participants; terms of endearment can also be easily misunderstood.
- Giving or loaning personal money or gifts to participants.
- Leaving themselves open to charges of professional misconduct or put themselves at risk of allegations of abuse; never rely on your own name and reputation to protect you from allegations.

Colleagues are asked to:

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

Appendix 5: Guidance for Handling a Disclosure

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

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

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

- Take the disclosure seriously and never dismiss any allegation of abuse.
- Provide a quiet and supportive environment to help the individual feel at ease.
- Allow the individual to speak freely (do not interview).
- Remain calm and don't overreact – they may stop talking if they feel they are upsetting their listener.
- Give reassuring nods or verbal acknowledgement.
- Never stop an individual who is freely recalling significant events, but don't push them to tell you more than they wish.
- Do not jump to conclusions.
- Don't be afraid of silence and allow space and time for the individual to disclose.
- Do not prompt the individual in any way or ask any leading questions as this may prejudice the outcome should any allegations go before a court.
- Clarify or repeat back what you think you have heard, if needed, but do not lead the discussion in anyway.

- Use questions such as “tell me...? Is there anything else?”
- At an appropriate time, tell the individual that in order to help them, you will need to pass the information on (strictly need to know basis); never promise confidentiality.
- Do not automatically offer any physical touch as comfort – it may be anything but comforting to someone who has been abused.
- Remember professional boundaries.
- Avoid admonishing the individual for not disclosing earlier as this may be perceived as meaning they have done something wrong.
- Tell them what will happen next in terms of reporting and signposting (if appropriate).
- Reassure them that they have done the right thing in reporting their concerns.
- Reassure them that confidences will be shared only with those who must know and that all guidance, advice and support possible will be given. This might include referring the participant to an external specialist agency, where appropriate.

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

1. Write an account of the conversation, as accurately as possible trying to use the individual's own language, statements and quotes; use their words and record precisely what has been alleged/happened.
2. Record the concern via the CURA system.
3. Be as factual as possible – what did they say happened, when, and to whom (remember other persons may be involved and at risk too).
4. Include the date/time they spoke to you and the date/time you wrote your record.
5. Include the names of any people who are present during the disclosure.
6. A brief description of any injuries, which are visible or alleged.
7. The individuals preferred action.
8. Remember that it is not for GC colleague to decide whether a suspicion, allegation or claim is true.

Appendix 6: The 7 Golden Rules of Information Sharing

1. Remember that the General Data Protection Regulations, Data Protection Act 2018 and human rights laws are not barriers to justified information sharing but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners or your data lead if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Where possible share with consent and, where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful reason to do

so, such as where safety may be at risk. You will need to base your judgment on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.

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

Appendix 7: Online Safety

[Link to Safeguarding Link Tree](#)

Information for Safeguarding in virtual context:

Domestic abuse – whilst delivery can be virtual, it is important to recognise the heightened risk of domestic abuse when individuals do not leave their home.

If you or someone else is in immediate danger, call 999 and ask for police but if you're not in immediate danger, there are many other resources out there:

Freephone 24-hour National Domestic Abuse Helpline, run by Refuge on 0808 247 2000, or visit www.nationaldahelpline.org.uk

National LGBT+ Domestic Abuse Helpline: 0800 999 5428.

Men's Advice Line: 0808 801 0327.

Respect helpline (for anyone worried about their own behaviour): 0808 802 0321.

Online technology is invaluable for services and programmes of learning but changes in online behaviour can put individuals at risk of online abuse.

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

- Not being able to speak freely
- Comments or questions about abuse or neglect
- Inadequate supervision of children and young people at home
- The impact of food poverty

- The health status in a family and any caring responsibilities

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

Increased time online may increase exposure to:

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

Harmful or upsetting content.

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

Bullying or abuse online

You can:

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

| Version | Notes | Owner |
|----------------|---|------------------------|
| 1 (October 21) | Standalone Procedure created to accompany Safeguarding Policy. | Safeguarding Panel |
| 2 (April 22) | Removed reference to NCS as a standalone document has been created and updated links to DSO lists and policy/procedure links. | Safeguarding Panel |
| 3 (May 23) | Annual Refresh Updated terminology from staff to colleagues Included BSBF to scope of the procedure. Updated Panel membership and BSBF DSOs Removed Safeguarding Action Group reference. Removal of NCS from flowchart Refreshed links. Annex 4 – updated to include CURA. Removal of Covid Annex | Safeguarding Panel |
| 4 (Feb 2024) | Review of DSO listings | Director Quality / DSL |

| | | |
|--|---|--|
| | Updated links to legislation and GOV.UK resources | |
|--|---|--|