



Safeguarding Policy

Policy Statement

Purpose and scope

All providers of adult, community and work-based learning in England and Wales are required by the Safeguarding Vulnerable Groups Act 2006 (as revised) to secure the safety of children, young people and vulnerable adults who are their learners.

As a provider of education, The Greenhouse is committed to ensure all learners are kept safe so that they can learn and thrive. The drive for 'Inclusive Learning' has succeeded in bringing into the system learners with a wide range of needs, including many who can now be deemed 'vulnerable'.

The term vulnerable is defined as a person 'who is or may be in need of community care services by reason of mental or other disability, age or illness: and who is or may be unable to care for him or herself, or unable to protect him or herself against significant harm or exploitation' (Department of Health 2000).

The term vulnerable may also apply to people at increased risk of abuse or mistreatment due to some of the following factors:

- They may be unaware of their rights
- They may be socially isolated
- They may not know how to complain or who to complain to
- They may have communication difficulties in making decisions
- They may have low self esteem
- They may be discriminated against linked to the nine protected characteristics
- They may not have access to healthcare
- They may be dependent on others for their basic health care needs

At The Greenhouse, this may apply to a colleague or a learner you work with.

A child is defined as anyone who has not yet reached their 18th birthday, 'Children' therefore means 'children and young people' The fact that a child has reached 16



years of age, is living independently or is in further education does not change his or her status or entitlement to services or protection under the Children's Act 1989 (As revised)

What is Safeguarding?

The term 'Safeguarding' describes the broader preventative and precautionary approach to planning and procedures that are necessary to be in place to protect children, young people and vulnerable adults from any potential harm or damage.

Safeguarding is more than having background check policies and procedures in place. It means having a culture of vigilance where all staff know their responsibilities and act accordingly and all learners are aware of what they can expect and what to do if they have concerns. It is about providing a deep commitment to place the learner at the centre of our concerns and to build policies, practices and procedures around the learner for them to succeed.

Safeguarding must be the informed responsibility of all staff, senior management, volunteers and board members to ensure the learning environment is safe and secure for all. In order to do so they will need to consider and act on the 5 R's:

Recognition

The ability to recognise behaviour that may indicate abuse is of fundamental importance. Whether the abuse may occur on The Greenhouse premises, in the home or in any other setting in which the learner may find themselves, all those playing a role in meeting learners' needs should be aware and informed so that possible abuse can be recognised, investigated and acted upon effectively.

Signs and symptoms of abuse of young people and/or vulnerable adults may include direct disclosure. All staff should be trained to understand signs of possible abuse and know how, where and to whom to report concerns. Staff will be able to recognise signs of abuse, will know how to respond to students, how to use appropriate questioning and how to record information accurately. They will be aware of the Designated Person Flowchart and how to follow this procedure.



Response

Appropriate response by our staff is vital. No report of or concern about possible abuse should ever be ignored. Staff are trained how to determine the most appropriate response and to clarify precise details. They are aware of the correct protocol, i.e.:

- Do not lead or probe with questions
- Remain calm, listen and ensure your body language and facial expressions remain neutral.
- Do not agree confidentiality, this may restrict you from taking any action later
- Reassure that they have done the correct thing in reporting their concerns and that everything possible will be done to help
- Record any disclosures accurately with no opinion or personal beliefs
- Keep copies of any notes taken and please sign and date them accordingly

It is essential to remember that children and young people may not feel ready or know how to tell someone that they are being abused, they may begin to disclose information only to stop and withdraw. You must not question or 'push' for information but report and wait for them to feel ready to make the approach again.

Report

Report your concern or allegation within 24 hours to the company Safeguarding Officer or member of staff with specific designated responsibility for dealing with issues relating to safeguarding your centre.

The Designated Safeguarding Officer will take responsibility from this point forward. The information must not under any circumstances be discussed with anyone apart from the designated Safeguarding Officer.

Recording

Staff are trained to ensure allegations are recorded precisely on the Safeguarding Children/Vulnerable Adult Incident Report form.



Please use the words of the complainant and include accurate quotation. This can include observations about the physical and emotional state of the individual sharing their concerns. Information is recorded and stored securely, confidentially and only accessible to those who need to access it as part of the action taken to resolve the complaint or allegation.

Referral

The decision to refer a complaint or allegation lies with the Designated Safeguarding Officer and Head of Centre, having gathered and examined all relevant information.

No one else will investigate such a situation. Investigation will involve questioning colleagues, learners, carers, parents, learners, assessors and the complainant. Designated Safeguarding Officers will have access to organisations and websites in order to seek guidance and help for learners.

Safeguarding Strategy

The safeguarding strategy sets out the strategic approach to strengthening our arrangements for safeguarding across the company.

The Greenhouse is committed to maintaining the highest possible standards to meet its social, moral and legal responsibilities to safeguard the welfare of every child/young person or vulnerable adult (hereinafter referred to as learners).

The emphasis of our safeguarding strategy and action plan is to focus on all the people who use our services. This will be a further demonstration of our organisational values & culture base. In order to meet the company culture and values to treat people well and keep people safe we need to demonstrate our effectiveness in safeguarding adults and children from abuse or the potential of abuse of any kind to enable people and children to feel safe.

The Aims of the Safeguarding Strategy

Our aims are:

- To ensure that all staff understand safeguarding is everyone's business



- To keep children, young people and vulnerable adult's safe
- To raise and maintain awareness regarding Safeguarding, Health & Safety, and Equality and Diversity across the company
- To ensure that we work in partnership and contribute to the safeguarding work with the relevant Stakeholders and Boards
- To learn the lessons and good practice from serious case reviews, local and national enquires
- To ensure LGBTQ+ children and young people have a safe space for them to speak or share concerns with members of staff

We shall achieve our objectives by carrying out the following strategic activities:

Strategic Planning

- By ensuring that safeguarding is embedded within our strategic and operational planning processes
- By reviewing annually this strategy and associated policies

Leadership and Management

- By implementing an annual Business Development Plan to address our areas for improvement and build on our strengths so that our safeguarding arrangements continue to improve
- By ensuring all personal data will be processed in accordance with the requirements of the Data Protection Act 2018 and General Data Protection Regulation (GDPR);
- By highlighting in job descriptions staff's responsibilities in relation to safeguarding;
- By giving staff opportunities to propose ideas and to share best practice through regular staff meetings, as minimum, annual training and awareness sessions and through staff surveys;
- By continuing to work with employers to benchmark their current safeguarding practice and work collaboratively to support improvement;
- By monitoring the development of all learning materials and establishing standardised best practice.

Safer Recruitment



- By implementing a rigorous staff recruitment and selection process (including risk assessment) to ensure their suitability to work with learners.

Induction

- By providing a thorough induction to both staff and learners to raise awareness and understanding of System People safeguarding arrangements, the standards expected and their responsibilities in relation to these.

Continuous Personal Development (CPD)

- All relevant staff will complete Safeguarding training annually.
- All Designated Safeguarding persons will complete Safeguarding training at Level 3.

Child Protection

By undertaking thorough risk assessments to ensure that all relevant staff and service providers are subjected to the relevant DBS check

By educating and empowering learners to take responsibility for their own safety and wellbeing and that of others.

Radicalisation and Extremism

Since 2010, when the Government published the Prevent Strategy, there has been an awareness of the specific need to safeguard young people and families from violent extremism. There have been several occasions in which extreme groups have attempted to radicalise vulnerable young people to hold extreme views including views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.

When any member of staff has concerns that a learner or member of staff may be at risk of radicalisation or involvement with terrorism, they should speak with one of the companies designated safeguarding officers. Most young people do not become involved in extremism, for this reason, the appropriate interventions in any particular



case may not have any specific connection to the threat of radicalisation, for example, they may address mental health, relationship or drug/alcohol issues.

As part of the wider safeguarding responsibilities, staff at The Greenhouse will be alert to use of extremist or 'hate' terms to exclude others or incite violence.

Risk Assessment

- By undertaking thorough risk assessments of learning processes that we deliver ourselves
- By working closely with employers and other partners to ensure appropriate risk assessments have been completed.

Communication

- By facilitating effective internal and external communications that promote clear understanding of strategic aims and objectives, policies, operating procedures and guidance notes.

Quality Improvement

- By observing teaching, learning and assessment
- By benchmarking our performance through analysis of Inspection Reports published by Ofsted/Estyn and other good practice materials
- By the publication of an annual self-assessment report (SAR) that evaluates the effectiveness of our safeguarding arrangements against the Common Inspection Framework
- By improving safeguarding arrangements via the Business Improvement Plan
- By listening carefully to what our learners and employers think of the experience they receive through formal and informal feedback opportunities, including questionnaires, regular formal reviews, monitoring visits, meetings, presentations and the complaints and compliments log
- By ensuring observations of key learning processes take into account safeguarding arrangements and support continuous improvement



- By sharing our best practice across contracts and the regions so that all learners benefit from consistently high standards.

In summary, the key processes required to be in place are:

- Business and development planning
- Policy and strategy review
- Staff recruitment and selection
- Risk assessment of the different 'Learner Journeys'
- Review of employers' safeguarding arrangements
- Self-assessment and quality improvement planning.

These key processes are dependent on:

- Communications within System People
- Communications with learners, employers and other stakeholders
- Learner, employer and staff feedback
- Feedback from the senior management team
- Monitoring and evaluation of activities and internal audit
- Benchmarking of performance against comparable organisations.

Roles and responsibilities

Overall responsibility for implementing this strategy and monitoring the Business improvement plan lies with the Management Team and Head of Centre .

The Head of Centre is responsible for the development and maintenance of the policies, strategies and operating procedures.

The Safeguarding Lead is responsible for acting as a source of advice and support in relation to safeguarding and protecting learners, promoting good practice and for co-ordinating action within the company on receipt of any concerns or referrals



The Head of Centre as part of the Quality and Compliance team undertakes review of all the documentation and ensures the processes are followed across the business

Delivery staff (with support from the Safeguarding Lead) are responsible for promoting and ensuring that the safeguarding standards set by The Greenhouse are applied to their provision

All operational staff job descriptions will include general responsibilities relating to safeguarding.

Communication of the Safeguarding Agenda

There are a wide range of meetings which address the implementation of this Safeguarding Strategy including, senior management team meetings, quality team meetings, and operational team meetings. Staff development sessions also enhance communication of the safeguarding agenda and focus on improving practice.

Reporting Procedure

No one other than the Safeguarding Lead or Head of Centre should mount an investigation into complaints, allegations or suspicions of abuse. If actions are carried out by someone other than the Safeguarding Lead or Head of Centre it could be seen as unjustified interference which could jeopardise an investigation and any possible subsequent court case.

All allegations against people who work with children and that meet the specific criteria below should be reported by the employer within one working day to Local Authority Designated Officer (LADO).

- Staff who have behaved in a way that has harmed a child or may have harmed a child
- Staff who have possibly committed a criminal offence related to a child
- Staff who have behaved towards a child or children in a way that indicates that he/she is unsuitable to work with children.



If you need to contact your Local Authority Designated Officer (LADO), please consult your Local Children Safeguarding Partnership or Local Authority Children Safeguarding Partnership in all other areas:

Key guidance and legislation

The key guidance and legislation for the safeguarding of children responsibilities for The Greenhouse are contained within:

- The Children Act 1989
- The Victoria Climbié Inquiry Report by Lord Laming; 2003
- Every Child Matters Green Paper 2003
- Every Child Matters 'Change for Children' 2004
- National Service Framework for Children, Young People and Maternity Services 2004
- The Children Act 2004(revised 2014)
- Working Together to Safeguard Children 2006
- Safeguarding Vulnerable Adults Act 2006
- Safeguarding Children and Safer Recruitment in Education 2007
- Vetting and Barring Scheme 2009
- Rehabilitation of Offenders Act 1974
- Equality Act 1998
- Children and Social Work Act 2017
- GDPR 2018
- Keeping Children Safe in Education 2021

Forms of Abuse

Physical Abuse – may involve hitting, shaking, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Factitious Disorder is also classed as physical abuse. Physical harm may also be caused when a parent or career feigns the symptoms of, or deliberately causes ill health to a child whom they are looking after. The situation is commonly described using terms such as Factitious illness by proxy or Factitious Disorder.



Emotional Abuse – is the persistent emotional ill treatment of a child that causes severe and persistent side effects on the child's emotional development. It may involve conveying to the children that they are worthless or unloved, inadequate or valued only in so far as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's development capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying causing children to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is present in all types of ill treatment of a child, though it can still occur alone.

Sexual Abuse – involves forcing or enticing a child or young person to take part in sexual activities including prostitution, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative (e.g. rape or buggery) or nonpenetrative acts. They may involve non-contact activities such as involving children in looking at, or in the production of sexual online images, pornographic material, or watching sexual activities, or encouraging children to act in sexually inappropriate ways. On 21st June 2018 the law changed to include 'Upskirting' as a criminal offence.

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 the child's health or development. Neglect may occur during pregnancy as a result of maternal substance misuse. Once a child is born it may involve a parent or carer failing to provide adequate food, shelter or clothing, failing to protect the child or vulnerable adult from physical harm or danger, or failure to ensure access to medical care or treatment. It may also be neglect of or unresponsiveness to the child's emotional needs.

Financial Abuse – This is illegal or unauthorised use of a person's property, money or other valuables. This may be limiting access to money or other resources, or by



forcing all financial responsibility onto their victim while limiting their ability to provide this. Financial abuse may include: Taking money from them. Not allowing them access to shared money.

Homelessness –The Homeless Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at-risk homelessness will have access to meaningful help an assessment of their needs and circumstances, development of a personalised housing plan or work to help them retain their accommodation or find a new place to live. Staff who identify a learner either at risk of homelessness or are homeless should raise this with the company Safeguarding lead or deputy.

'Honour Based' Violence (HBV) –HBV encompasses crime or incidents that have been committed to defend or honour of a family and or community. This may include forced marriage or female genital mutilation. All forms of HBV are abuse regardless of the motivation.

Female Genital Mutilation (FMG) –FMG comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. FMG is illegal in the UK and a form of child abuse with long lasting harmful consequences.

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 one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.



Criminal Exploitation – County Lines –Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns.

Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. Like other forms of abuse and exploitation, county lines exploitation;

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Domestic Abuse – Domestic abuse can impact children in a variety of ways including: psychological, physical, sexual, financial or emotional. This can be through seeing, hearing or experiencing the effects of domestic abuse in the home between others or within their own intimate relationships.

Child on child abuse –Children can abuse other children. This used to be referred to as peer on peer abuse and can take many forms. This can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals.

Key points in legislation include:



- the importance of explaining to children that the law is in place to protect rather than criminalise them
- the importance of understanding intra-familial harms, and any necessary support for siblings following incidents
- the need for schools and colleges to be part of discussions with statutory safeguarding partners.

Other forms of abuse can include, but are not limited to, and may pose a risk to children, learners and vulnerable adults; serious violent crime, risks linked to using technology and social media, substance misuse, issues that may be specific to local area or population e.g. gang activity and knife crime. It must be remembered that all forms of abuse will have a negative impact on mental health.

All concerns should be reported to the company Safeguarding lead and/or Head of Centre

Staff Responsibilities and Training

Learners

All Learners will be introduced to their rights and responsibilities with regards to Safeguarding through their induction and initial assessment. Learners will go through a thorough sign up procedure with a member of staff, where any additional needs will be determined, logged and appropriately dealt with.

All Learners in work-based learning will have their place of work vetted by a trained member of staff for Health and Safety purposes. Learners who work in places deemed medium or high risk will be revisited at regular intervals. Reviews with learners include specific safeguarding questions, covering areas including Health & Safety, Equality and Diversity, Safeguarding and British values; these reviews are carried out every 4 – 6 weeks as a minimum.

Training

All new employees will be introduced to their rights and responsibilities with regards to Safeguarding at their initial induction. The relevant policies are available to all employees.



All staff in contact with learners who are under 18 or vulnerable adults will receive appropriate safeguarding training annually and regular safeguarding updates.

Effective training is the key to carrying out our responsibilities of promoting and safeguarding children and young people. Staff will need to be trained on how to identify a learner in need, and what subsequent action to take. Training will take place on a variety of levels, and will depend upon the needs of the staff concerned.

All staff will have a basic induction which will include how to report safeguarding concerns.

The Designated Safeguarding Lead will undertake regular inter-agency training and refresher training annually.

ICT Training facilities

Cyber bullying is the act of communicating harmful, violent and/or malicious words and or pictures through the means of technology.

Cyber bullying is the term used to refer to bullying and harassment by use of electronic devices though means of e-mail, instant messaging, text messages, blogs, mobile phones, pagers and websites. No longer does bullying transpire only on centre grounds.

The cyber world has allowed for children and vulnerable adults to be vulnerable to bullying in the safe haven of their home. This new ability to socially network in the cyber world is rapidly expanding the harmful effects children suffer from being bullied. The Greenhouse plays an active role in protecting their learners from this rising trend by barring them from sites and all social networking sites. All our computers are audited regularly by qualified IT staff.

Recording, Sharing of Information and Consent Issues



Important statutory duties in relation to vulnerable adults and children in need cannot be met without effective and appropriate sharing of information. For agencies to work together to the benefit of children, they must be able to share relevant information.

This includes a referral to Children's Social Care Local Authority or Safeguarding department but could simply be sharing information between supporting agencies (MDT) regarding a young person, for example, before a referral is made. However, sharing of information should take place according to the principles of good practice and on a need-to-know basis.

When a request for information is made we need to be clear about why the information is needed and the way it is going to be used. Prior to information being shared with other agencies, or a referral being made, consent should normally be sought from the young person and/or from one parent/carer with agreed parental responsibility. However, there are certain important circumstances where consent should not be sought.

These are:

- If this would put the child or young person at greater risk of significant harm.
- Interfere with criminal enquiries
- Raise concerns about the safety of staff.

Online Training Delivery

When delivering remote sessions online the following rules apply:

- Delivery of classes via a suitably secure platform and teaching/learning software; consideration of filter and security settings.
- Wearing of suitable clothing.
- Lessons taking place in appropriate areas, for example, not in bedrooms; and where possible, against a neutral background.
- Professional and appropriate language, including from any family members in the background.
- Use of appropriate language in chat functions.
- Keeping lessons to a reasonable length of time Protocols for contact outside of normal operating times.



- Screen fatigue –the health and safety implications of sitting in online learning sessions all day.

Safeguarding Guidance

Good practice ideas:

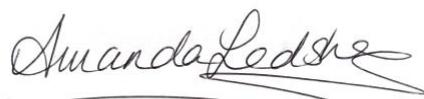
- It is best practice to work in an open environment avoiding private or unobserved situations and encouraging open communication
- Treating all learners equally with respect and dignity always putting the welfare of each child first
- Maintaining a safe and appropriate distance with learners
- Being an excellent role model, be aware of the effect that your words and actions may have
- Assessments should be scheduled to be within the normal working day of the institution
- Ensure training and work experience providers are fully briefed on Safeguarding issues and that they agree to a Safeguarding policy or appropriate control measures.

Practices to be avoided:

- Spending excessive amounts of time alone with learners away from others
- Saying anything that might make the learner feel uncomfortable or debased.
- Saying anything that could be interpreted as aggressive, hostile or impatient.
- Being drawn into personal conversations or introducing personal subjects.
- Sitting or standing too close to the learner.
- Standing over the learner or otherwise making the learner feel pressured.
- Meeting other than at the pre-arranged venue
- Exchanging personal contact details.

Monitoring

Our procedures for safeguarding learners will be in line with Government legislation and the Funding Agency guidelines. When this is changed our policy will be amended to reflect the changes. The implementation of this policy will be monitored by the Senior Management Team and Head of Centre each year.



Checked and reviewed: 21/07/2025

Next review due: 21/07/2026