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Projecting Success Safeguarding, Prevent and Freedom of Expression Policy

Safeguarding Policy

1. Introduction, Scope and Purpose

Safeguarding is a term used to communicate the duties and responsibilities of those working in education to protect individuals from harm and ensure they feel safe. All Projecting Success employees who work with apprentices have a crucial role in shaping apprentices' lives and a unique opportunity to interact in ways that promote awareness of welfare, safety and empowerment.

2. Policy Overview

This safeguarding policy covers all apprentices regardless of location and age and all aspects of the apprenticeship programmes offered by Projecting Success. All Projecting Success staff must understand their safeguarding role, report concerns and help ensure that children, young people and adults at risk are protected from harm, informed about potential risks to their welfare, and know how to seek help.

The policy applies to all staff, including senior managers and governors, paid staff, volunteers, part-time and agency workers, apprentices, and anyone working on behalf of Projecting Success.

Safeguarding includes physical, emotional, financial, institutional, sexual, neglectful and organisational abuse; health and safety; wellbeing; online safety, cyberbullying and cybercrime; substance misuse; child protection; protection of adults at risk; child-on-child abuse; bullying, harassment, victimisation and discrimination; domestic abuse and coercive control; sexual exploitation, female genital mutilation, forced marriage and honour-based abuse; sexual violence and harassment; grooming;

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inappropriate supervision; security of learning environments; radicalisation, extremism and terrorism; mental-health concerns, self-harm and risky behaviour; trafficking, modern slavery and breast ironing.

Key Principles and Aims

- Everyone is treated with respect and courtesy in an environment free from harassment and discrimination.
- Learning environments, facilities and equipment comply with applicable health and safety standards.
- Projecting Success works with apprentices, employers and partner agencies to promote a safe and healthy culture.
- Staff are trained to recognise vulnerability, check welfare and report concerns to designated safeguarding staff.
- Apprentices are supported to improve their health, wellbeing, online safety, confidence, resilience and independence.
- Projecting Success raises awareness of radicalisation and extremism and acts to prevent people being drawn into terrorism.
- Confidential advice, guidance and signposting are available where specialist support is required.
- The safeguarding team monitors concerns systematically, and Projecting Success follows safer-recruitment practice.

Key Strands of Activity

Safer Recruitment

Projecting Success complies with best practice and legislative requirements when recruiting and training staff. Appropriate pre-employment checks, including Disclosure and Barring Service checks where relevant to the role, are completed.

Induction and Training

All Projecting Success staff undertake mandatory safeguarding training appropriate to their role. New starters receive induction covering the signs and indicators of abuse, neglect, bullying and harassment; safe working practices; and how to respond quickly, sensitively and appropriately to a disclosure.

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Safe Learning

The principles of Keeping Children Safe in Education and wider safeguarding expectations are embedded within teaching, learning, quality assurance and quality improvement. Apprentices engage with current affairs, financial health, wellbeing, physical health and life in modern Britain.

Safe Environment

Projecting Success promotes a safe, friendly and welcoming learning environment, with a culture of respect and courtesy, and monitors safety through regular progress reviews with apprentices and employers.

Accidents and Incidents

All accidents and incidents at a Projecting Success location or an apprentice's workplace must be reported through the approved safeguarding reporting system and recorded in the apprenticeship management platform where appropriate. The employer retains responsibility for investigating workplace incidents, while Projecting Success will also review the matter.

Prevent Duty

Projecting Success has duties under the Counter-Terrorism and Security Act 2015. Staff are trained to understand the Prevent duty, and robust arrangements are maintained for reporting concerns about apprentices or staff who may be at risk of radicalisation or extremism. Apprentices are encouraged to discuss issues in a safe and open environment.

External Speakers

External speakers and their materials must not promote extremism, encourage radicalisation or be offensive. The external speaker authorisation form and presentation materials must be submitted to the Director of Operations for approval at least 14 days before the event, allowing time for enquiries and appeals where required.

Mental Health, Wellbeing and Resilience

Projecting Success supports positive wellbeing and resilience through programme activities, discussions with apprenticeship staff and referral to specialist or confidential external support where appropriate.

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Providing Support

Staff must record precisely what has been alleged or witnessed, using the words of the person raising the concern and factual observations about their physical and emotional presentation. Records must be made promptly in the approved safeguarding system and accessed only by those who need the information. Projecting Success will signpost to external agencies and protection services where specialist expertise is required.

Safeguarding Apprentices

Projecting Success recognises its legal obligation to protect young people and adults at risk from abuse. Staff provide information, advice and guidance, maintain clear lines of communication and are supported by an appropriately trained Designated Safeguarding Lead and Deputy Safeguarding Officers. Disclosures are handled quickly, sensitively and appropriately in accordance with the safeguarding process.

Allegations Against Staff

Projecting Success follows current statutory guidance and internal procedures for managing safeguarding allegations or concerns about employees, volunteers and contractors. Relevant requirements are reflected in the Disciplinary and Grievance Policy. If required, external agencies such as DBS, the Police and other agencies will be notified.

Confidentiality

Safeguarding information is highly confidential. Staff must report concerns to the safeguarding team through the approved reporting system. Information is shared only on a need-to-know basis with staff, employers or external agencies. Safeguarding records must be stored only in the approved secure system and not on local drives or removable media.

Supporting Staff

Projecting Success recognises that involvement in a safeguarding case may be stressful. Staff may discuss the impact with a designated person, who can arrange further support where needed.

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Law and Guidance

This policy is implemented in line with applicable safeguarding and child-protection legislation and guidance, including Keeping Children Safe in Education; Working Together to Safeguard Children; the Counter-Terrorism and Security Act 2015; Education Acts 1986 and 2002; the Apprenticeships, Skills, Children and Learning Act 2009; the Education and Training (Welfare of Children) Act 2021; the Children Acts 1989 and 2004; the Care Act 2014; the Equality Act 2010; the Data Protection Act 2018 and UK GDPR; the Human Rights Act 1998; the Modern Slavery Act 2015; the Mental Capacity Act 2005; the Sexual Offences Act 2003; legislation on female genital mutilation; and relevant DfE, Ofsted, UKCIS, DBS, police and local safeguarding partnership guidance.

Review, Dissemination and Disclaimer

This policy is reviewed annually and is available to current and potential clients and apprentices. Projecting Success reserves the right to amend it at any time to reflect legislation, guidance and lessons learned.

Roles and Responsibilities

Designated Safeguarding Staff

- Follow referral, escalation and monitoring procedures where there are concerns about abuse, vulnerability or risk.
- Ensure staff understand and follow this policy and associated procedures.
- Maintain up-to-date safeguarding contact information.
- Support investigations, referrals and risk-management activity through to conclusion.
- Maintain secure records of welfare and safeguarding concerns, including where no immediate referral is needed.
- Signpost or refer to specialist and statutory agencies as appropriate.
- Consult senior management before referrals to bodies such as Ofsted or funding authorities where appropriate and safe to do so.
- Keep records confidential, separate from apprenticeship and employer files, and use monitoring information to support improvement.

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All Staff

- Raise employers' awareness of their safeguarding responsibilities.
- Provide or signpost apprentices to suitable information, advice and guidance.
- Record and report actual or potential safeguarding concerns immediately through the approved process.
- Follow referral and monitoring arrangements and seek advice from the safeguarding team when unsure.

Key Contacts

The Projecting Success safeguarding team can be contacted through the organisation's published safeguarding contact route. The current Designated Safeguarding Lead and safeguarding officers are listed in the internal safeguarding contacts register.

Appendices

Appendix 1 – External Speaker Authorisation Process

The external speaker process requires advance submission of speaker details and materials, safeguarding and Prevent review, approval or rejection, communication of the decision, and retention of the authorisation record.

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Prevent Policy

Policy

The Counter-Terrorism and Security Act 2015 places a duty on education providers to have due regard to the need to prevent people from being drawn into terrorism. The Prevent duty forms part of the Government's CONTEST counter-terrorism strategy: Prevent, Pursue, Protect and Prepare.

The purpose of Prevent is to stop people becoming terrorists or supporting terrorism. It addresses all forms of terrorism by challenging supportive ideology, protecting vulnerable individuals and supporting sectors and institutions where there is a risk of radicalisation. Channel is a voluntary, multi-agency safeguarding programme that identifies individuals at risk, assesses that risk and develops an appropriate support plan.

Objectives

1. Respond to the ideological challenge of terrorism and those who promote it.
2. Prevent people from being drawn into terrorism and ensure appropriate advice and support are available.
3. Work with sectors and institutions where risks of radicalisation must be addressed.

This policy is shared with employees on joining Projecting Success. Staff confirm that they have read and understood it, and revisions are communicated through continuing professional development.

Definitions

- **Radicalisation:** the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Terrorism:** action or threatened action designed to influence government or intimidate the public for a political, religious, racial or ideological cause, as defined in legislation.

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- **Extremism:** vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs.

Information Sharing and Recording

Information sharing is assessed case by case and must be necessary, proportionate and lawful. Consent should be obtained wherever possible, unless doing so would create risk or another lawful basis applies. Suspected terrorist activity must be referred to the police. Projecting Success safeguarding case-management and recording procedures apply to Prevent casework.

Scope

This policy applies to all Projecting Success staff and apprentices.

Leadership and Governance

Prevent forms part of the safeguarding agenda and is overseen by a nominated lead. It is embedded within relevant IT, online safety, social media, learning-platform and safeguarding arrangements. A Prevent risk assessment and action plan are reviewed periodically, with external advice where appropriate.

Guidance

Channel Panel Process

The multi-agency Channel Panel develops appropriate safeguarding support for people at risk of being drawn into terrorism. It is chaired by the relevant local authority and includes police and other statutory partners. Channel is not an intelligence-gathering or criminal-sanction process; it is an early-intervention safeguarding process requiring proportionate and lawful information sharing.

Assessing Vulnerability

Vulnerability is assessed across engagement with a group, cause or ideology; intent to cause harm; and capability to cause harm. The dimensions are considered separately and reviewed over time. Indicators are neither exhaustive nor determinative and must not be used to create a simplistic profile.

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Identifying Vulnerable People

Possible indicators may include increasing association with extremists; behaviour becoming centred on an extremist ideology; loss of interest in other relationships or activities; possession of extremist material; recruitment attempts; communications indicating extremist identification; blaming or dehumanising another group; justifying violence; threats or planning; a history of violence; use of criminal networks; or specialist skills capable of enabling terrorist activity. Any assessment must consider the individual context and avoid assumptions based on protected characteristics, ideas or lawful beliefs alone.

Consent

Consent must be handled sensitively. For children, practitioners will normally speak with the child and family unless this would increase risk or the family is implicated. For adults, informed consent should normally be sought before referral or information sharing. Information may be shared without consent where lawful and necessary, including to prevent serious harm or crime. Concerns about capacity must be addressed in line with the Mental Capacity Act 2005.

Referral Process

Concerns about radicalisation must be reported through the Projecting Success safeguarding process without delay. The safeguarding team will assess the concern, seek advice where required and determine whether referral to the relevant police Prevent team, Channel, children's or adult social care, early help or another support service is appropriate. Call 999 if anyone is in immediate danger.

Referral to Channel does not itself constitute criminal intervention. A person displaying one or more possible indicators is not necessarily at risk of radicalisation. Decisions must be evidence-based, proportionate and professionally assessed.

Transfer Arrangements

Where a Channel case moves between local-authority areas, the relevant Channel panel chairs agree responsibility and continuity arrangements.

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Referral Flow

Concern identified - internal safeguarding review - proportionate information gathering and risk assessment - referral to the relevant Prevent policing team where appropriate - multi-agency assessment - Channel support, alternative safeguarding support or no further action. All decisions and reasons must be recorded.

Risk and Intervention Process

The multi-agency panel develops a support package based on vulnerability, need and risk to the individual, public, partners and providers. The plan identifies behaviours and risks to be addressed, delivery partners and review arrangements. Support may include life skills, mentoring, anger management, cognitive or behavioural work, constructive activities, education, careers, family support, health support, housing support, or drug and alcohol interventions.

Providers must be credible, suitable and committed to shared values, with appropriate checks including DBS checks where applicable. Cases are reviewed until risk has reduced or been managed, alternative support is arranged, or escalation through police mechanisms is required. Decisions and actions are recorded.

Working with Partner Agencies

Projecting Success works collaboratively with local authorities, police Prevent teams, social care, youth offending and probation services, health and education providers, and community organisations. Requests from Channel or Prevent multi-agency arrangements must be answered within the required timeframe, and relevant changes in circumstances must be shared lawfully.

Channel Panels

Channel panels coordinate interventions, develop support plans for accepted cases, signpost other support where cases are not accepted, seek consent before support is provided and cooperate with panel partners. Membership is determined by the needs of each case.

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Case Management, Recording, Supervision and Support

Projecting Success safeguarding case-management, recording and supervision procedures apply. Practitioners must balance consent, trust, human rights and individual liberty with risks of harm, working confidently and sensitively in a complex context.

Safeguarding Staff Following a Referral

Any threat to a referrer or staff member must be reported and managed through police and organisational risk-assessment and safeguarding arrangements.

Training

Staff receive training on vulnerability indicators, the Channel process and the application of the Prevent duty to their role. Refresher learning and awareness activity are provided through continuing professional development. Appropriate national Prevent and counter-terrorism awareness learning may supplement organisational training.

Review and Change History

This policy is reviewed annually, or sooner when legislation, statutory guidance, organisational arrangements or identified risks change.

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Freedom of Expression Policy

Freedom of Expression in the United Kingdom

Article 10 of the Human Rights Act 1998 protects the right to freedom of expression, including the freedom to hold opinions and to receive and impart information and ideas without interference by public authority and regardless of frontiers.

The exercise of this right carries' duties and responsibilities. Restrictions may apply where they are prescribed by law and necessary in a democratic society, including in the interests of national security, public safety, prevention of disorder or crime, protection of health or morals, protection of the reputation or rights of others, prevention of disclosure of confidential information, or maintenance of the authority and impartiality of the judiciary.

Freedom of expression is an important value in the United Kingdom and is essential to a democratic society because it enables individuals to express themselves, exchange ideas and participate in public debate. Projecting Success also recognises that lawful limitations may be necessary to prevent harm and safeguard vulnerable people.

Policy Guidelines

Projecting Success is committed to upholding freedom of expression while meeting its safeguarding and Prevent responsibilities. The following guidelines apply:

- Freedom of expression will be protected within the bounds of the law. Unlawful speech or expression, including hate speech, incitement to violence and harassment, will not be tolerated.
- Staff will receive training and guidance to recognise and respond to signs of radicalisation and extremism, identify individuals who may be vulnerable and take appropriate safeguarding action.

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- Projecting Success will work with relevant authorities and agencies, including the police and local authorities, so that potential risks are identified and addressed promptly and effectively.
- Where there is a risk of harm, Projecting Success may restrict expression that promotes or glorifies extremism or radicalisation. Any restriction will be carefully considered, lawful, necessary and proportionate, in line with the Safeguarding and Prevent sections of this policy.
- Projecting Success will provide a safe and inclusive environment for apprentices and staff. Discrimination and harassment will not be tolerated.
- This policy and associated procedures will be reviewed regularly to maintain alignment with legal requirements and good practice.

Through these guidelines, Projecting Success aims to promote freedom of expression while safeguarding people from harm and maintaining a safe, inclusive and respectful environment for staff, apprentices and other stakeholders.

Conclusion

The right to freedom of expression is protected under United Kingdom law but must be balanced with the protection of vulnerable people and the rights of others. Expression or material that unlawfully promotes or incites terrorism, violence or hatred is not protected and may result in safeguarding, disciplinary or legal action. Everyone is responsible for ensuring that their conduct does not cause harm or promote extremist views.

Review

This section will be reviewed annually, or sooner where legislation, statutory guidance, organisational arrangements or identified risks change.

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Change History:	• Safeguarding, Prevent and Freedom of Expression source policies transferred into the Projecting Success template. • Organisational references standardised to Projecting Success. • Freedom of Expression Policy added after the Prevent Policy. • Structure consolidated and legacy operational details replaced with current-role wording where specific contacts require confirmation. Updates made in line with KCSIE
Reviewer:	**Terri McGregor**
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Signature of Reviewer:	