

Safeguarding Policy



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1. OUR COMMITMENT

All our colleagues who work with learners have a crucial role to play in shaping their lives. You have a unique opportunity to interact in ways that are both affirming and inspiring. This policy has been produced (and is supported by Information, Advice and Guidance), to help you to establish safe and responsive environments which safeguard all and reduce the risk of you being unjustly accused of improper or unprofessional conduct. We all have a duty of care to safeguard and promote welfare, and to enhance awareness of the broader welfare spectrum, specifically the issues facing young people in society.

2. OBJECTIVES

The aim of the policy is to ensure you are aware of and understand your responsibilities, that of others, signs there might be a safeguarding concern, along with the reporting procedures for all safeguarding issues.

3. SCOPE

This policy covers safeguarding of Children and Adults at Risk – our learners, learners during EPA and those persons in settings in where we practise which fall into the category of child or adult at risk. It is inclusive of specific highlighted safeguarding agenda areas – as defined by law, as specified in Keeping Children Safe in Education (2023) and in the wider context all our students and learners. This policy is also influenced by and aligns with requirements set out in 'The Education Act (2002) Section 175', 'Working Together to Safeguard Children (2023) updated Dec 2023', This policy also aligns with the government Counterterrorism and Security Act 2015, that places a duty upon all education providers to have regard to the need to prevent people from being drawn into terrorism. This Prevent Duty forms part of the wider governments CONTEST counter terrorism strategy:

- Prevent terrorism – stop people becoming terrorists
- Pursue terrorism – disrupt and stop terror attacks
- Protect against terrorism – strengthen UK protection
- Prepare to deal with terrorism – mitigate impact of attacks that can't be stopped.

The aim of the Prevent strategy is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism. The Prevent strategy has three specific strategic objectives:

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

JCL have a separate Prevent Policy for more detail in relation to how it meets the Prevent Duty

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4. KEY CONTACTS

The safeguarding team can be contacted on supportme@jclss.co.uk

Designated Safeguarding Lead: Claire Lee

Safeguarding Executive Team representative: Claire Lee

Additional Designated Safeguarding Officers listed below:

Deputy Safeguarding Lead - Lisa Tyrer

Development Coach - Louise Rowe

5. DEFINITIONS

Safeguarding is the protection of children and of adults at risk from abuse and neglect, promoting health and development, ensuring safety and care, and ensuring optimum life chances. The Safeguarding Agenda includes a wide range of potential risks (see appendix F for full definitions and indicators of a Safeguarding concern).

- Abuse (physical, emotional, financial, institutional, sexual, and organisational)
- Self-neglect
- Discrimination
- Child sexual exploitation
- Bullying and cyberbullying
- Cybercrime
- Domestic abuse
- Substance misuse
- Fabricated or induced illness
- Faith abuse
- Forced marriage.
- Gang and youth violence
- Private fostering
- Female genital mutilation (FGM)
- Gender based violence
- Radicalisation
- Sexting
- Peer on Peer abuse, including Sexual Harassment
- Relationship abuse, including teenage relationship abuse
- Trafficking and modern slavery
- Breast ironing
- Mental health concerns
- Sexual violence and sexual harassment, including child on child abuse
- Children missing in education.

A child is defined as anyone under the age of 18 as cited in the Education Act (2002), An adult at risk as

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defined by the Care Act (2014) as any person over the age of 18 and of abuse or neglect because of their need for support or personal circumstance. Alongside the Safeguarding Agenda risks above this could be due to, and not limited to any of the following:

- Living in sheltered housing
- Receiving any form of health care
- Is or has been supported by a social worker
- Receiving a welfare service in order to support their need to live independently
- Receiving a service due to their age or disability
- Living in residential accommodation such as a care home
- Receiving domiciliary care in their own home
- Expectant or nursing mother living in residential care
- Person under supervision of probation service

The definitions of a child and adult at risk give the rationale for legislative intervention, it is important to note that that learners can be temporally vulnerable due to change in circumstances or due to poor mental health. A person may also be deemed at higher risk of a safeguarding issue affecting them due to other factors. This is termed contextual safeguarding. Examples of areas to consider are:

- Poor numeracy and literacy skill, or specific learning need
- English not a first language
- Unsupportive employer
- Under-represented group
- Acting as a carer for another family member
- Background in offending or is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- Has a disability or social need
- Has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- Lives 'In Care' or has recently transitioned out of Care
- Is a young carer
- Is frequently missing/goes missing from care or from home
- Is within a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse or generally unsupportive.
- A number of groups of learners have been identified as being more vulnerable, and each have proportionate measures in place in order to ensure the learners are fully supported. These include learner on an EHCP, coach core learners and in care learners

6. OUR RESPONSIBILITY

We all have a responsibility to ensure that children, young people, and adults at risk are protected from harm, informed about potential risks to their welfare, and understand how to seek help. We ensure all concerns are dealt with timely and appropriately. We also have a responsibility to minimise the risk of allegations against you.

All staff are expected to comply with any background disclosure check request and to have a good understanding of what constitutes a safeguarding or welfare concern, have read KCSIE (2023) Part 1 along with any other relevant policies, know how to provide support, guidance in such instances, and the channels for escalating a concern. To assist you in this, on-going training and awareness, as well as continuous information, advice and guidance will help you to feel confident in proactively promoting safeguarding and understanding your individual responsibilities.

The responsibilities of particular individuals are detailed below:

- Our Directors - to be knowledgeable about safeguarding and to ensure we have effective policies. To receive reports on safeguarding at each board meeting.
- Our MD - to ensure policies are implemented and followed, and sufficient time and resources are allocated to employees to carry out their responsibilities.
- Designated Safeguarding Lead – to maintain links with local multi-agency safeguarding partners (local authorities, chief officers of police, and clinical commissioning groups), and Prevent Coordinators, inform and advise all parties on legislation changes and current safeguarding themes, plan and implement training for all employees including CPD, quality assurance and standardisation for the designated safeguarding officer team. Carry out investigations where appropriate into welfare concerns reported and liaise with external bodies such as safeguarding board where appropriate. Support and coordinate escalation process. Overall management of safeguarding issues and report to board on any issues that arise. Review procedures and policies on a timely basis. Maintain own CPD to ensure their role can be fulfilled competently. They will also provide advice and support to other staff on child welfare, safeguarding and child protection matters, taking part in strategy discussions and inter-agency meetings, and/or supporting other staff to do so, and to contributing to the assessment of children. They will lead on policy and training, making referrals to external agencies such as Local Authority children's social care/Chanel/ Police and DBS. Have awareness of those children that are in need and how their education is impacted and progressing; this includes children allocated a social worker where this has been alerted to JCL, acknowledging the risk to these learners could be higher, and ensuring support is in place. They will also pass this information where relevant to a learner's new training provider if they leave a JCL's programme. They act as JCL's Mental health lead for both learners and employees when informed, oversee information security for safeguarding and work with the data protection team where required, including monitoring web filtering systems for both employee and learners. The lead will also nominate and ensure Deputy Designated Safeguarding Officers are in place and trained to the same level. They will also report to the Board on safeguarding.
- Designated Safeguarding Officers – to deal with employee concerns over learners' welfare, signpost and offer guidance. Carry out investigations where appropriate into welfare concerns reported and liaise with external bodies such as Regional Prevent Coordinators, local multi-agency safeguarding partnerships (which constitute local authorities, chief officers of police, clinical commissioning groups)

- where appropriate. Maintain own CPD to ensure their role can be fulfilled competently and seek guidance where appropriate.
- Safeguarding Administration support – monitor the supportme inbox twice daily and ensure a Designated Safeguarding Officer is informed about any new concerns within 24 hours.
- Our Coaches/Tutors and EPAs - to check safety and welfare with all learners at each visit/communication, ensuring learners complete all safety-related learning activities within their programme. You must be aware of indicators and that there may be a safeguarding issue – see Appendix E, and if required to follow the 5 R's procedure (Recognise, Respond, Record, Report, Refer), our flow chart for reporting issues that concern them or are reported to them (see Appendix D). To provide support and referral to external agencies as they see fit, if comfortable to do so, and then inform safeguarding team of their actions. To complete allocated training as directed by the safeguarding team in a timely manner.
- Support Teams - You must be mindful of indicators that there may be a safeguarding issue should you come into contact with a learner or potential learner – see Appendix E, and if required to follow the 5 R's procedure (Recognise, Respond, Record, Report, Refer) , our flow chart for reporting issues that concern them or are reported to them (see Appendix D). To complete allocated training as directed by the safeguarding team in a timely manner.

The topic of Safeguarding can be very sensitive due to the content and may be difficult for you to discuss. If you have any concerns over issues raised, please contact a Designated Officer as quickly as possible.

7. SAFER RECRUITMENT

JCL undertake a range of Safer recruitment practises throughout the recruitment process including sharing our commitment to Safeguarding in job adverts, a thorough interview process and collation of references. JCL ensures that all appropriate checks are carried out on new staff that will work or come into contact with children and adults at risk in line with the Disclosure and Barring Service and Teacher Regulation agency (TRA) requirements, and KCSIE. JCL reserve the right to do online checks as part of Safer Recruitment (KCSIE 2023). All recruiting managers go through 'Hiring Right First-time training which includes an interview workshop around safer recruitment practices which is part of their manager on boarding programme See resourcing policy for further detail on recruitment procedures.

7.1. DISCLOSURE AND BARRING SERVICE CHECKS

The Disclosure and Barring Service (DBS) (who manage the Protecting Vulnerable Children Scheme (PVG)) are an executive agency of the UK government whose primary purpose is to help employers make safer recruitment decisions and appointments.

By conducting checks and providing details of criminal records and other relevant information, DBS helps to identify applicants who may be unsuitable for certain work and positions, especially those involved with children (those less than 18 years old) or adults at risk.

Depending on the type and regularity of contact with children or adults at risk involved in a particular role, employers are entitled to make appropriate types of enquiries about the applicant's criminal record and seek a disclosure through a DBS check. JCL can undertake five types of criminal records checks depending on the role applied for:

STANDARD DBS CHECK

This will be for positions that are included in the Rehabilitation of Offenders Act (ROA) 1974 (Exceptions) Order 1975.

This type of check contains details of an individual's convictions, cautions, reprimands or warnings recorded on police central records and includes both 'spent' and 'unspent' convictions that will be shown on a criminal records check.

ENHANCED DBS CHECK

This will be for positions included in both the ROA 1974 Exceptions Order and in the Police Act 1997 regulations. This type of check contains the same details as the standard check plus any information held locally by police forces that it is reasonably considered to be relevant to the post applied for.

ENHANCED DBS & BARRED LIST CHECK (CHILD)

An enhanced check with information from the DBS's children's barred list is only available for those individuals engaged in regulated activity with children and a small number of posts as listed in the Police Act 1997 regulations.

ENHANCED DBS & BARRED LIST CHECK (ADULT)

An enhanced check with information from the DBS's adults barred list is only available for those individuals engaged in regulated activity with adults and a small number of posts as listed in the Police Act 1997 regulations.

ENHANCED DBS & BARRED LIST CHECK (CHILD AND ADULT)

An enhanced check with information from the DBS's children and adults barred list is only available for those individuals engaged in regulated activity with both vulnerable groups including children and a small number of posts as listed in the Police Act regulations.

7.2. WHEN AND WHAT TYPE OF DBS CHECK IS APPROPRIATE

A senior member of the People team and Designated Safeguarding Lead are responsible for deciding which level of check is appropriate for a particular role and whether barred list checks are necessary. Even where a post has some contact with children or adults at risk, the definition of regulated activity may not be fully satisfied, but in order to safeguard our learners any unsupervised contact with learners will result in an enhanced DBS check with child barred list. The Safeguarding Vulnerable Groups Act 2006 (amended by the Protection of Freedoms Act 2012) defines what types of activities involving children and adults at risk are regulated and therefore require barring list checks. Appendix A specifies current posts at JCL that require DBS and/or barring list checks.

Regulated Activity – is a term that defines activities that an individual engages in, defined by the Disclosure and Barring service. The criteria for regulated activity differ for adults and children as shown overleaf:

Children

- Regular activity (once per week or 4 times over the course of 1 month)
- Unsupervised activity
- Teaching, training, assessing, mentoring based activities in relation to nonwork-related activities - working intensively and closely with a child
- Within specified settings

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Adults

- Healthcare professionals – those whose role includes providing first aid
- Receiving or giving personal assistance to those due to age, illness or disability (going to the toilet/washing/nutritional advice)
- Providing social care - being subject to or assessing the need for health/social care
- Providing assistance in someone's personal affairs or allowing someone else to do so
- Provide assistance with cash, bills and shopping (allowing someone else to or shopping on someone's behalf)
- Person who transports or is transported because of their illness
- Caring responsibilities
- Teaching or supervising children and/or protected adults
- Providing personal services to children and/or protected adults
- Working directly with children and/or protected adults

Individuals must not engage in regulated activity with either children or adults at risk if they have been barred from doing so by the DBS scheme. How we meet our responsibility towards this is explained below. Further advice on types of DBS disclosure and the circumstances in which regulated activity applies can be obtained from the People Team.

Where JCL is recruiting for a role that qualifies for a DBS check, the advert and further information during the interview process will confirm the type of check required. When the most suitable candidate for the position has been identified, the offer of appointment will be made subject to a satisfactory DBS check, right to work, references and qualification checks. In the instance that the outcome of a DBS check has not yet been received from the appropriate authority prior to learner visits being carried out, all visits with learners aged below 18 will be supervised by a person whose DBS outcome has been received and approved. The Director of Education will be responsible for arranging this supervision. Quality assurance of this process is in place.

As a DBS check forms part of our recruitment process, we encourage all candidates to declare anything relevant to the type of check required for the role. Once an offer has been made, candidates should tell us of any further details of convictions, including those that normally would be considered as spent, cautions or reprimands.

As part of our safeguarding obligations, we will re-apply for the appropriate types of DBS/PVG checks on a 3-year basis during employment with JCL. If someone is already part of the update service:

- DBS – we request an updated check for that number

Some contractual requirements dictate an annual declaration from employees in relation to conforming to any changes that may affect the outcome of their DBS check. Any changes will be risk assessed following the procedure set out in 7.5

7.3. CONFIDENTIALITY

Information provided in a disclosure report must be kept confidential and, on a need, -to-know basis. Such information will be handled in accordance with JCL's 'Statement on the Secure Storage, Handling, Use, Retention and Disposal of Disclosures and Disclosure Information', Appendix B. Any other information regarding offences must be kept securely and in accordance with JCL's Data Protection Policy.

We recognise that job applicants and our employees need to feel confident that information about their convictions will not be disclosed to colleagues unless there is a specific reason for doing so. Those involved in recruitment decisions should ensure that when appointing an individual with a conviction, they are advised as to whom within JCL knows of their conviction and the reasons why the information has been disclosed.

If you would like further information on our disclosure process, please see Appendix C.

7.4. FAILURE TO DISCLOSE INFORMATION RELEVANT TO THE TYPE OF DBS CHECK APPROPRIATE TO YOUR ROLE

Having a criminal record does not necessarily preclude an individual from working at JCL. The decision as to whether a person with a criminal record should be appointed, or an offer of employment withdrawn, or employment terminated will be taken only after careful and thorough consideration of the outcome of any DBS check as well as the job and offence related factors as explained in 8.6.

Nonetheless we request all employees to tell us about any information relevant to the type of DBS check appropriate for their role. This could mean, for example, that if your role requires satisfactory Enhanced DBS and barring check, you need to tell us about any convictions, cautions or reprimands or being barred from working with children as soon as any of these have been issued. Failure to disclose information relevant to the type of DBS check appropriate to your role would be seen by JCL as a breach of trust and confidence. Such acts are considered as gross misconduct, and you would be invited to a disciplinary hearing with a potential outcome of instant dismissal.

7.5. EXPLORING THE RELEVANCE OF INFORMATION PROVIDED IN THE DISCLOSURE REPORT

As we explained in the previous section having a criminal record does not necessarily preclude an individual from working at JCL. The decision as to whether a candidate with a criminal record should be appointed, or an offer of employment withdrawn, will be taken only after careful and thorough consideration of the outcome of any DBS check as well as the job and offence related factors as explained in section 8.6.

Similar to the recruitment process, a disclosure of a criminal record will not necessarily lead to termination of your employment with us and the decision will be taken only after careful and thorough consideration of the job and offence related factors. Any decision to terminate employment would follow our Disciplinary Policy (or Probationary Policy if you have not yet passed your probation).

A senior member of the People Team, alongside the Designated Safeguarding Lead will make an initial assessment of the content of the disclosure report. If the report provides no evidence of convictions or any other relevant information, no further action will be taken. If the report confirms a conviction or any other relevant information, a senior member of People Team, alongside the Designated Safeguarding Lead, will make an initial assessment of whether the information provided has any potential relevance to the post. If there is clearly no potential relevance, no further action will be taken.

If the report confirms a potentially relevant conviction or any other potentially relevant information further exploration will be required following the process outlined below.

7.6. EXPLORING A CONVICTION AND ITS RELEVANCE

All discussions relating to convictions must take place after the selection process has been completed and will involve the line manager and a senior member of the People Team and the Designated Safeguarding Lead. As part of the decision-making process, they will normally meet with the individual to gain more information from the person about the nature and circumstances of any conviction.

The suitability for employment of a person with a criminal record will clearly vary, depending upon the nature of the job and the details and circumstances of any convictions. The decision will be made on the basis of a risk assessment to enable the applicant's criminal record and circumstances to be assessed in relation to the tasks he or she will be required to perform and the circumstances in which the work is to be carried out. The following job-related factors should be taken into account:

- Does the post involve direct contact with learners or the public?
- What level of supervision will the post-holder receive?
- What level of trust is involved? Will the nature of the job present any opportunities for the post-holder to reoffend in the place of work?
- Does the post involve any direct responsibility for finance or items of value?
- Does the post involve any contact with children or other vulnerable groups of learners or employees?

The assessment is also likely to include consideration of the following factors relating to the individual's offence(s):

- The seriousness of the offence(s) and relevance to the safety of other employees, students, research subjects, the public etc.
- The length of time since the offence(s) occurred.
- Relevant information offered by the person about the circumstances that led to the offence(s) being committed, for example the influence of domestic or financial difficulties.
- The degree of remorse, or otherwise, expressed by the person and their motivation to change.
- Whether the offence was a one-off, or part of a history of offending.
- Whether the person's circumstances have changed since the offence(s) was(were) committed, making re-offending less likely.
- Whether the offence has since been decriminalised.

Following careful and thorough consideration of all these matters and consultation with a senior member of the people team and Designated Safeguarding Lead, a decision will be made as to whether the individual should be appointed. If appropriate we may seek further information from relevant bodies when reaching this decision. If the decision is not to appoint, a letter will be sent to the individual confirming the reasons for this decision.

The above process will also be followed in the event of a criminal conviction coming to light after the formal offer of employment has been made or during employment. In such cases JCL would reserve the right to withdraw the offer of appointment where appropriate or terminate employment in line with the JCL's

7.7. Learner DBS/PVG checks

We have a duty to ensure that learners understand what a DBS check is and if it is required for their role. The employer is ultimately responsible for ensuring anyone they employ has the necessary checks in place. However, we do support employers to engage with the DBS to fully understand their role and responsibility.

Work Based Learning - Each employer partner site undergoes a H&S vetting process. This requires the coach to check the mandatory legislative DBS requirements are understood by the learner and employer in the relevant sectors. The learner's curriculum is contextualised to their work setting and reinforces the importance of the DBS process.

8. REPORTING A CONCERN - SEE APPENDICES D FOR PROCESS CHARTS

- a. If a learner raises a concern/allegation with you: If the learner has a concern over their own personal welfare and wellbeing, you are to listen to and record all information given, making no judgement or assumptions. Take any actions required to secure the immediate safety of the child or adult at risk if deemed appropriate; this may involve staying with them until a responsible adult can be located. This will only be recorded on the review if learner agrees and raised with the manager if learner agrees. If the learner gives consent, you must report the issue to a Designated Safeguarding Officer. You should always consider the wishes of the individual, even those aged under 18; if you feel the learner's safety and wellbeing are at risk and they do not give consent for the matter to be escalated, you should work with the learner to encourage this.

If the learner is aged under 18, at risk of harm and no consent agreed you should still escalate, (as set out in Working together to safeguarding children 2023) If a learner is at risk of harm; getting them the correct support is likely to be more important than maintaining their confidentiality. Guidance should be sourced with a Designated Safeguarding Officer if you are unsure and concerns can be reported anonymised initially until it has been established there is need to share information. Those learners aged 18 and over the concerns should still be recorded even if no action taken. They will then decide the appropriate course of action, and if a referral for early help intervention or to local authority. (D1)

If a Coach /Tutor/EPA has concerns over a learner: This might be through observation, alleged by others or discussion. To follow procedure set out as point (a) above if a learner raises an issue/allegation with the DC (D1)

If a learner/parent has a concern/allegation about a member of JCL or Innovate staff: All learners are to be informed that if they have a concern over the conduct of a JCL employee, they are to contact a JCL Designated Safeguarding Lead. If the learner informs the coach or another JCL employee, they are to report it to the Designated safeguarding lead. Contact details are available in this policy (see section 4 above). See section 9 for more detail on how concerns over employees are managed including low level concerns (D2). The LADO may also be informed where relevant.

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- b. This safeguarding policy is also available on JCL's external website. (D2)
- c. If a parent contacts you to report a concern about their child: Ensure you listen and record the details in the same way as a learner reporting a concern to you (see (a) above). Ensure you have contact details for the parent. You must report the issue to the Designated Safeguarding Officer. They will then decide the appropriate course of action, and if a referral outside the organisation is appropriate, liaise with the parent as appropriate. Be mindful of confidentiality as all learners aged 16 and above, and of employed status, are deemed to be adults, and therefore no information should be passed to parents or carers without prior consent to do so from the learner. (D1/2)
- d. If you observe a safeguarding issue taking place within the working practices of an employer's setting or during JCL delivery sessions: An example would be a practitioner hitting a child or observing inappropriate restraint techniques, or learners verbally or physically abusing each other. Take action to stop the activity immediately and inform the individual of your concerns. Ask them to remove themselves from the area and advise them you will inform their senior manager. In those cases where learners are not on a work-based learning programme inform the safeguarding team. Take any actions to secure the safety of the child or adult at risk; this may involve staying with them until a responsible adult can be located. Inform your Designated Safeguarding Officer in all cases. Be mindful of differences between poor practice and a safeguarding issue and apply your action appropriately. (D3)
- e. If a learner reports unsafe practices or safeguarding issues to you within their working/learning environment: Advise the learner to follow in-house reporting or whistle blowing procedures. If it is related to a JCL learner activity session, follow JCL's safeguarding reporting procedures. You may support the learner in speaking to the appropriate senior team members if appropriate. Report the incident to your Designated Safeguarding Officer who will offer additional guidance and signposting for the learner and will monitor. (D3)

It is important you do not pass any information to other parties or try to investigate the concern yourself. All concerns should be reported to supportme@jclss.co.uk in the first instance using the Disclosure reporting form (appendix G)

- If you require an immediate response, call a Designated Safeguarding Officer immediately; it is noted that the designated officer may not be available out of normal working hours, so in circumstances where the individual is in immediate danger report the incident to the police on 999.
- The Designated Safeguarding Officer will endeavour to make initial contact regarding the concern within 24 hours (not including weekends). Outside of working hours the learner welfare helpline operates 24 hours a day 7 days per week and can be contacted at any time for support and is signposted through the supportme email address.
- The Designated Safeguarding Officer will assess if the individual is at risk of significant harm and decide upon the next course of action; this can range from offering signposting to support agencies, to referral to the police and local safeguarding authorities. This may also involve passing information to the LADO, DBS.
- Also be mindful of any subcontract arrangements in place for the learner. In some instances,

safeguarding officers at other companies might need to be informed. Ensure you pass to the safeguarding officer the name of the subcontractor (e.g. Cambrian training). For employer providers

- we partner with, their safeguarding officer must be informed, and they take the lead in dealing with the concern. We will support where required.
- If you feel a Designated Safeguarding Officer has not complied with their duty of care to a reported learner concern, please contact the Designated Safeguarding Lead identified in this policy (section 4 above). If you feel the Designated Safeguarding Lead has not complied with their duty of care to a reported learner concern, please contact the Director of Education. You may also escalate the concern yourself to the relevant external agency (*See Appendices D and E for process of reporting*)

9. MANAGING ALLEGATIONS AGAINST EMPLOYEES

The Department for Education guidance sets out procedures for managing safeguarding allegations or concerns against teaching staff, other staff, volunteers and contractors. In this guidance training providers are now expected to respond to two levels of concern about staff behaviour:

- (1) Behaviour that meets a perceived 'harms' threshold and
- (2) Behaviour judged as a 'low level' concern' that does not meet the 'harms' threshold.

It is JCL's intention to create a culture in which all concerns about adults (including allegations that do not meet the harms threshold) are shared responsibly and with the right person, recorded and dealt with appropriately. We aim to create and embed a culture of openness, trust and transparency in which our expected behaviours, which are set out in the staff Code of Conduct, are constantly lived, monitored and reinforced by all employees.

Alongside our Code of Conduct and Safeguarding policy which detail expected behaviours, JCL will also:

- Ensure that employees are clear about what is appropriate behaviour through awareness and training.
- Create an environment where employees feel confident in sharing low-level concerns, and are comfortable to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.
- Address unprofessional behaviour and supporting the individual to correct it.
- Ensure a responsive and proportionate handling of such concerns.
- Through case analysis identify any business improvements required.

Alongside the processes below employees are also able to report concerns through JCL's Whistleblowing process, following the whistleblowing procedure detailed in the Whistleblowing policy.

9a ALLEGATIONS THAT MAY MEET THE HARMS THRESHOLD INNOVATE • EDUCATE • EMPOWER

JCL will consider that behaviour meets the harms threshold if employees – including employees on temporary contracts, volunteers or contractors - have:

- Behaved in a way that has harmed a learner or may have harmed them.
- Possibly committed a criminal offence against a learner.
- Behaved in a way that may pose a risk of harm to a learner.
- Behaved in a way that indicates they may not be suitable to work with learners.

Safeguarding allegations or concerns arising from the above should be reported to the Designated Safeguarding Lead (DSL). Where there are concerns/allegations about the Safeguarding Lead this should be referred to the People team. If the allegation/concern identifies that a learner has been harmed, is at immediate risk of harm or is an emergency situation, the DSL (or People team as appropriate) will immediately contact social care services and where appropriate, the police. They will also ensure that:

- The learners affected are safe.
- Inform and support the person subject to the allegation as soon as possible.
- Conduct basic enquiries to establish the facts to help them determine whether there is any foundation to the allegation. They will collect as much evidence as possible by speaking directly to the person who raised the concern (unless raised anonymously), to the individual involved and any witnesses. The information collected will be reviewed against the employee code of conduct to determine what further action may need to be taken, including liaising with a senior member of the people team should the disciplinary policy need to be followed.
- If appropriate, liaise with the Local authority Designated Officer to consider the allegation and agree a course of action.
- If appropriate, conduct an internal investigation carried out aligning with misconduct policy.
- Work with the People team to implement any internal disciplinary procedures where required.
- Work with the People team to support the subject of the allegation.
- All relevant information is shared with police/social care if appropriate.
- Any parent/ guardian/ employer is informed and updated where required.

All concerns should be recorded in the Case Management system by the DSL (or deputy).

9b. LOW LEVEL CONCERNS THAT DO NOT MEET THE HARM THRESHOLD

A low-level concern is any concern about employees – including employees on temporary contracts, volunteers or contractors - who may have acted in a way that is inconsistent with the staff code of conduct (including inappropriate conduct outside of work) but does not meet the harms allegations threshold. Examples of such behaviour could include but are not limited to offering personal favours to learners, being overly friendly, using inappropriate language or sharing personal information.

JCL will seek to identify and deal with inappropriate behaviour early to mitigate the risk of abuse. Low-level concerns should be reported to the DSL (or a deputy). Where a low-level concern is raised about the DSL, it should be reported to a senior member of the people team. The DSL (or People team as

appropriate) will collect as much evidence as possible by speaking directly to the person who raised the concern (unless raised anonymously), to the individual involved and any witnesses. The information collected will be reviewed against the employee code of conduct to determine what further action may need to be taken, including liaising with a senior member of the people team should the disciplinary policy need to be followed. All concerns should be recorded in MILO Case Management system by the DSL (or deputy). Records will be reviewed periodically so that potential patterns of concerning behaviour can be identified. Where a pattern of such behaviour is identified (including where low-level concern move to meeting the harms threshold) JCL will decide on a course of action.

10. TRAINING AND EDUCATING EMPLOYEES

Each member of the safeguarding team holds at least a formal L2 designated officer safeguarding qualification and undertakes regular CPD events and standardisation meetings in order to keep updated with legislation and refresh their knowledge.

All employees undertake a Safeguarding Induction and/or completion of a L2 online course specifically for Safeguarding Vulnerable Young People and Adults.

All coaches also complete:

- Level 1 Award in Principles of Safeguarding in a Learning Environment
- L4 Assessor Coach qualification/ EAT L3

The training received is continually reviewed to ensure the most appropriate and up to date training is given. Aligning with the mandatory duty surrounding the Counter Terrorism and Security Act 2015, all staff undertake Prevent training aligning with their role within JCL.

There is annual CPD training for formal procedures and emerging themes. Periodic updates surrounding key safeguarding concepts are communicated monthly via internal communication channels. Monthly focus topics are also distributed via these channels to raise awareness and promote discussion in all areas under the wider safeguarding agenda including areas such as radicalisation, mental health issues, positive relationships, and staying safe on the internet, which will educate employees alongside giving greater knowledge to be passed onto learners.

There is reference to safeguarding in team meetings –, with managers utilising the information in the monthly safeguarding and equality newsletters (Bits & Bites) as well as a health and safety section, to stem discussions.

Key individuals involved in staff recruitment complete an in-house safer recruitment training course annually, which informs Hiring Right First time training all line manager receive, referred to in Safer recruitment.

11. EXPECTED BEHAVIOURS & KEEPING YOURSELF SAFE

This section extends the expected behaviours set out in the code of conduct. And should be considered alongside the JCL universal expected behaviours. To maintain your and learners' safety, the following are strictly prohibited:

- Befriending learners on personal social media sites
- Distributing personal telephone numbers
- Visiting learners at home or transporting learners to and from locations (this includes travelling in a car with a learner driving)
- Directing sarcasm, insults or belittling comments towards learners
- Personal relationships with learners
 - It also important to be mindful of the following when conducting yourself:
- Locations of one-to-one meetings with colleagues. These should take place at a neutral location.
- You will naturally build a rapport with learners through apprenticeship contact, and the learners may see you as a confidante and supportive but be sure to maintain professional boundaries whenever carrying out work on JCL's behalf.
- Be respectful of all young and vulnerable people, and appreciate you are in a position of trust.
- We have the opportunity to listen to their concerns and support them.
- Uphold confidentiality within certain remits when required by the situation but be careful not to promise to keep secrets or ask others to do so.
- Avoid spending time alone with learners in a closed environment. If this is unavoidable for example during a formal assessment/examination, ensure a member of the site staff is aware where you are and monitors this.
- Be careful when giving learner advice – as this is based on your opinion, focus support around information (facts), and guidance (signposting).
- Be mindful of any learners you acquire that by default creates a conflict of interest, i.e. a partner or friend becomes a learner. Discuss appropriateness/alternative trainer arrangements with your line manager.
- If a learner offers you gifts of any sort as a result of the support through their programme, refer to the bribery policy for the process to follow.
- If at any point you feel unsafe in a learner's company, inform the site manager, your line manager, the Designated Safeguarding Officer and leave the premises.

12. KEEPING LEARNERS SAFE

JCL offer an apprenticeship recruitment service which places potential apprenticeship learners into employment. It is recognised that this creates a duty of care for JCL to ensure that employers are suitable to receive an apprentice.

To this end:

- A service level agreement is undertaken prior to an apprentice commencing employment to clarify expectations in relation to basic health and safety, and other employment requirements for the learner.
- There is an employer welcome guide that is available to employers to help them understand
- JCL and their own responsibilities under safeguarding, health and safety and Prevent agendas.
- Health and safety vetting is carried out during learner induction for new sites. This involves a discussion between the coach, employer and learner, and allows for the trainer to be confident in

the employer's ability to keep the learner safe during their employment, and also to help educate

the learner in looking after their own welfare, and that of others, while at work. Its supports health and safety, and other essential legislative requirements such as a need for some learners to have a DBS check. H&S is also covered during enrolment directly with the learner and is part of the Life Skills mandatory learning plan.

- Learners are made aware of all of JCL's relevant policies, who the designated persons are and how to report a concern during their induction to the programme. There is also a dedicated support site on the learner information portal/learning community to signpost information, advice, and guidance for a wide range of support needs, and a direct email address to allow the learners to access support from the designated safeguarding officer confidentially. There is an essential information guide containing the same information is made available during the enrolment process.
- Learners are issued with a learner welcome guide detailing both internal and external support services, accessible through the e-learning platform'. This contains contact details for police, JCL's head office and direct link to the safeguarding team. It also provides details of an external learner welfare assistance programme, which is a 24-hour confidential helpline which will provide learners with a counselling service, or signposting to relevant support experts should they require it.
- Learners complete a mandatory Life Skills Learning plan which covers a range of welfare and wellbeing issues and allows for review and further discussion with coaches where appropriate. Monthly topics in relation to equality and diversity and safeguarding are highlighted by an externally written newsletter Bits and Bytes which all learners are sent via email and available within their e-portfolio. The content aligns with the employee monthly newsletter and aids learner awareness and support discussion
- JCL request contact details for Next of Kin for all under 18 learners, alongside relevant employer contact details

Additional social needs identification and process is support that is provided by JCL for all learners who are facing Social, Emotional, Behavioural and Mental Health difficulties. This process supports Increasing the ability to learn & making learning more accessible whilst dealing with personal issues, helps with motivation to reach their potential, provides extra support avenue giving them quality time as and when needed.

Learners can self-declare at sign up stage that they require support or a coach can refer them at any point during the programme.

Additional welfare support for 16-19 learners - receive a 3-month support package including and workbook and workshop that includes awareness of; employment expectation, developing resilience, British values and radicalisation, online safety and awareness of sexual harassment. Learners that don't attend have the workshop presentation added to their e-portfolio, and both the coach and themselves are informed its available to view. 19-year-old have access to the workshop aspect

Care leaver support and bursary access - learners highlight if they are residing in care or a recent care

Safeguarding Policy

leaver. This is alerted to the ASN team, who work with the learner to check bursary eligibility, provide support and facilitate access to and guidance for use of the bursary funding.

Online Safety is being aware of the nature of the possible threats that you could encounter whilst engaging in activity through the Internet. These are based around the 4 areas of e - safety - conduct, content, contact and commerce These could include security threats, protecting and managing your personal data, online reputation management, and avoiding harmful or illegal content. These might manifest as online abuse, bullying, threats, impersonation, grooming, harassment or exposure to offensive and/or violent content. We educate learners around online dangers of this nature through a variety of avenues including our Life Skills learning module and remote taught sessions in relation to conduct and content of the session including appropriate behaviours. This is inclusive of supporting learners understanding of using both JCL and their own devices Periodically our Safeguarding newsletters cover online safety topics. These are used by coaches as educational content for learners. To ensure we monitor and act upon accessing of inappropriate content and comments, filtering systems are in place on employee and distributed learner devices to restrict access to illegal and unsuitable content and our social media platforms. We adhere to the Children's Education setting provided by the 'Zoom Platform' <https://explore.zoom.us/en/schools-privacy-statement/>

Forcepoint filtering system is subject to monthly sample by DSL to identify and act upon any illegal/unsuitable content access attempts.

Child on Child abuse/ Sexual Harassment and Violence between children.

As a result of Ofsted's review into sexual abuse in schools in 2021, a range of interventions have been applied to educate and support learner around identification and accessing support around sexual harassment and abuse. JCL take a zero-tolerance approach to sexual harassment and abuse, and while we have noted that concerns are alerted to us through the safeguarding reporting process, including those by perpetrators under investigation, acknowledge that this may under represent issues that our learners encounter. Coaches are provided with training on indicators and support avenues as part of the safeguarding support process. Annual CPD is also provided to refresh knowledge This training includes identification of and action required for incidents of this nature alongside what learner might view as accepted norms, and what constitutes sexual harassment and abuse both face-to-face and online. This includes sexual harassment and violence in the workplace. Any concerns of this nature (including those alerted to us by a perpetrator under investigation) should be reported to the safeguarding team at supportme@jclss.co.uk, so a designed safeguarding officer can support any internal workplace and external reporting procedures and/ or required education. Where required the DSO can work with partnership teams to ensure importance is highlighted with us, and suitable investigations are in place by an employer.

In order to educate learners about acceptable behaviours, how to identify and report concerns, it is covered periodically through the Bits & Bites newsletters All 16-19 learners have access to a workshop that provides a taught session that covers sexual harassment identification, inappropriate behaviours, expected

Safeguarding Policy

behaviours in the workplace, how to report and what support available. Those that cannot attend have the resources added to their e-portfolio account to explore at their own pace. This accompanies the 3-month additional social needs support all 16-18 learners have allocated to them.

Children supported by a social worker.

It is recognised that young people who do have or have had the support of a social worker may be more vulnerable than other young people. This support need is identified through learner disclosure or contact directly from the social worker, it may also be highlighted on an EHCP. The DSL have oversight of such learners and support is provided by ALN/ ASN teams as direct liaison with social worker where required.

Physical Health

Physical health describes condition of our body and encompasses illness, injury, and health conditions, acute or chronic. Where a learner discloses any physical health support needs, they will be supported appropriately in order to both access, progress with and complete their programme. This may involve supporting learners' employers with adjustment awareness.

Mental Health

The increased importance of supporting poor mental health has been seen through the increased prevalence of mental health concerns raised by learners both as a sole issue and also as an associated issue as a result of experiencing another safeguarding issue. All learners have access to the Learner Welfare Helpline which provides counselling if required and are provided with bespoke support where required. They are encouraged to seek support from their employers, where appropriate, who in the main, have robust support networks in place. All learners will also complete the Life Skills learning plan which has a module focused on managing mental health and wellbeing. The Bits & Bites newsletters that learners also receive also have section on wellbeing and mental health every month. The DSL leads on Mental Health strategy to support and promote positive mental health for learners.

Learner Accidents

If an accident occurs in the workplace or at one of our venues, the overall responsibility to investigate lies with the employer or venue, but JCL will still investigate the incident to ensure learners are being supported appropriately. If an accident occurs out of the workplace whilst under supervision of JCL, JCL have overall responsibility to investigate. The coach is to complete the accident reporting form, located in Learner Welfare/ Huddle and send to the H&S and Welfare Manager.

Learner risk assessment

To ensure JCL supports the health and safety of all learners, in certain situations JCL may risk assess support requirements for learners, e.g. if a medical condition has been declared, has been subject to sexual harassment/violence or is on bail.

Subcontracts

Where JCL acts a lead provider, providing funding to other companies, JCL will provide appropriate training /guidance to subcontracts to ensure JCL policies and procedures are followed, alongside the due diligence checks carried out. This will be monitored (see Subcontracting Quality Assurance Framework).

Where JCL acts as a subcontract to other companies, we commit to upholding the policies and procedures of the training provider/college which holds the funding. JCL will also attend any relevant training/updates, adhere to monitoring requirements, be aware of and adhere to funding regulations as set out by the different funding authorities.

13. LEADERSHIP AND MANAGEMENT

A Safeguarding board report is presented monthly as part of the board pack and gives opportunity to update the Senior team providing a greater focus on safeguarding and safety of learners, and discuss trends, new initiatives and directives in more detail., and agree company actions.

The effectiveness and impact of all welfare support is monitored via a survey to those learners experiencing a safeguarding issue alongside a more generalised survey to all learners analysing support avenues and impact of educational material. Monthly learner welfare audit reviews all processes and material.

The safeguarding officer team are also subject to quality assurance checks carried out by the DSL.

14. ASSOCIATED POLICIES

- Equality and Diversity Policy
- Grievance Policy
- Disciplinary Policy
- Social Networking and Media Policy
- Prevent Policy
- Resourcing Policy
- Bribery Policy
- Code of Conduct
- Whistleblowing Policy
- Health and Safety

APPENDIX A

LIST OF POSTS THAT REQUIRE APPROPRIATE TYPE OF DBS AND BARRING LIST CHECK

JCL Post	No Check	Basic DBS	Enhanced DBS	Enhanced DBS with Child barred
Main learner facing teams (e.g. Coaches, Learner support tutors, RA)				✓
Designated Safeguarding officers				✓
Potential to be learner facing (e.g. Area Managers, QAL's, Engagement Leads)				✓
Learner contact with potential Influence (e.g. SLEM)				✓
Employees with access to CRM and Government contract information			✓	
Other Support functions			✓	

APPENDIX B

STATEMENT ON THE SECURE STORAGE, HANDLING, USE, RETENTION AND DISPOSAL OF DISCLOSURES AND DISCLOSURE INFORMATION

GENERAL PRINCIPLES

As an organisation using the Disclosure and Barring Service (DBS) to help assess the suitability of applicants for positions of trust, JCL complies fully with the DBS Code of Practice regarding the correct handling, use, storage, retention and disposal of disclosures and disclosure information. It also complies fully with its obligations under the Data Protection Act and other relevant legislation pertaining with the safe handling, use, storage, retention and disposal of DBS disclosure information.

STORAGE AND ACCESS

Disclosure information is never kept on an applicant's personnel file and is always kept separately and securely, in lockable, non-portable, storage containers with access strictly controlled and limited to those who are entitled to see it as part of their duties.

Handling

In accordance with section 124 of the Police Act 1997, disclosure information is only passed to those who are authorised to receive it in the course of their duties. The People Team will be responsible for maintaining a record of all those to whom disclosures or disclosure information has been revealed. It is recognised that it is a criminal offence to pass this information to anyone who is not entitled to receive it.

Usage

Disclosure information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

Retention

Once a recruitment (or other relevant) decision has been made, JCL may retain disclosure information to cross check 3 yearly DBS refresher disclosures. Throughout this time, the usual conditions regarding safe storage and strictly controlled access will prevail.

Disposal

Once the employee leaves JCL, JCL will ensure that any disclosure information is immediately destroyed by secure means, i.e. by shredding or confidential waste disposal. While awaiting destruction, disclosure information will not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack). JCL will not keep any photocopy or other image of the disclosure or any copy or representation of the contents of a disclosure. However, JCL will keep a record of the date of issue of a disclosure, the name of the subject, the type of disclosure requested, the position for which the disclosure was requested, the unique reference number of the disclosure and the details of the recruitment decision taken.

APPENDIX C

DBS DISCLOSURE PROCESS

JCL uses Ucheck who is a registered body responsible for authorising and processing applications for DBS checks.

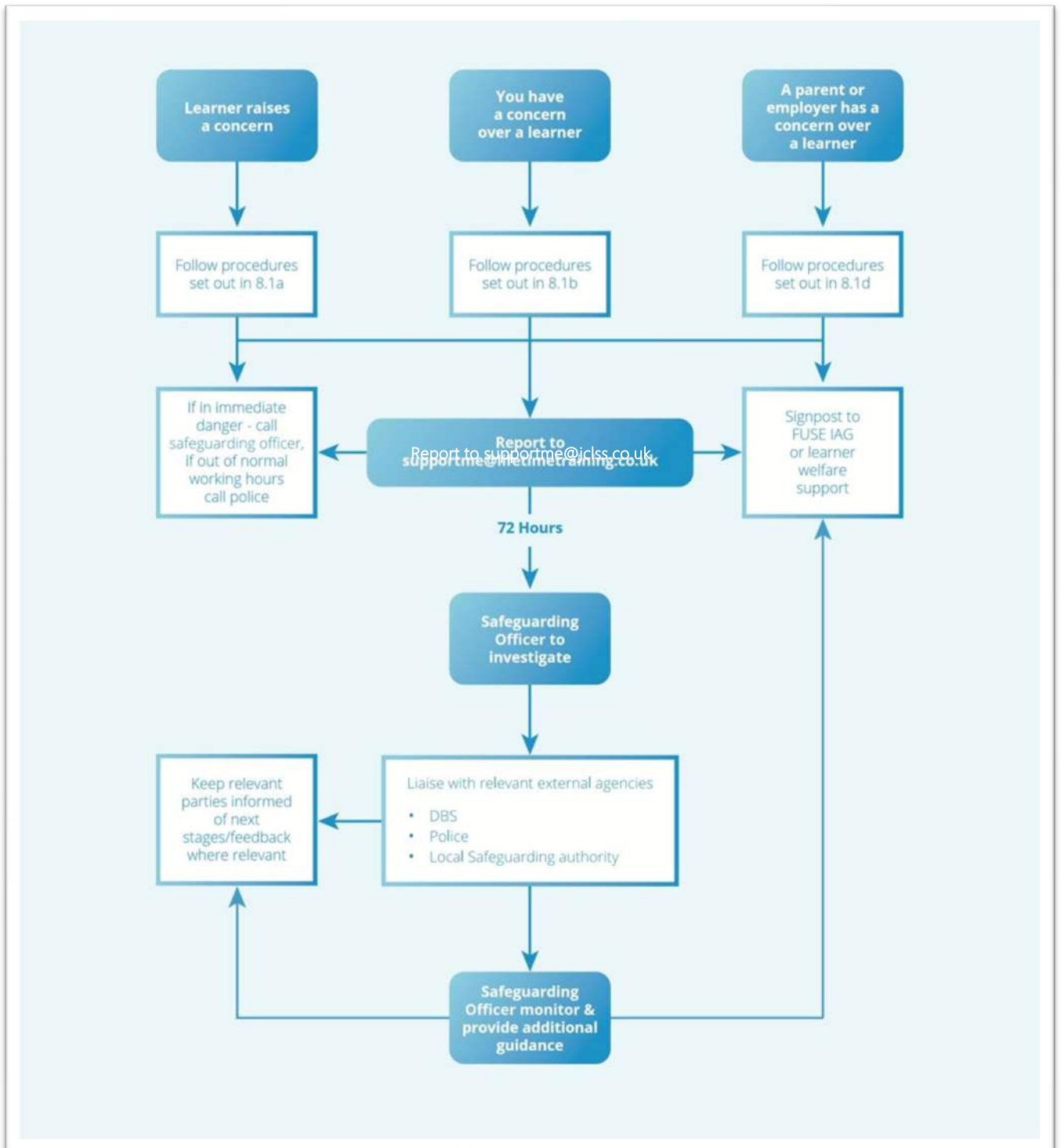
Potential candidates are also told prior to and during interview stage they will be subject to a DBS check and asked to declare anything at interview stage that they feel is relevant in this area.

Wherever possible the DBS disclosure should be obtained prior to the individual commencing employment, but sometimes this may not be possible. In such cases the individual can commence employment but only on a supervised basis for those aspects of the job involving contact with children or adults at risk until such time as a satisfactory disclosure report is received.

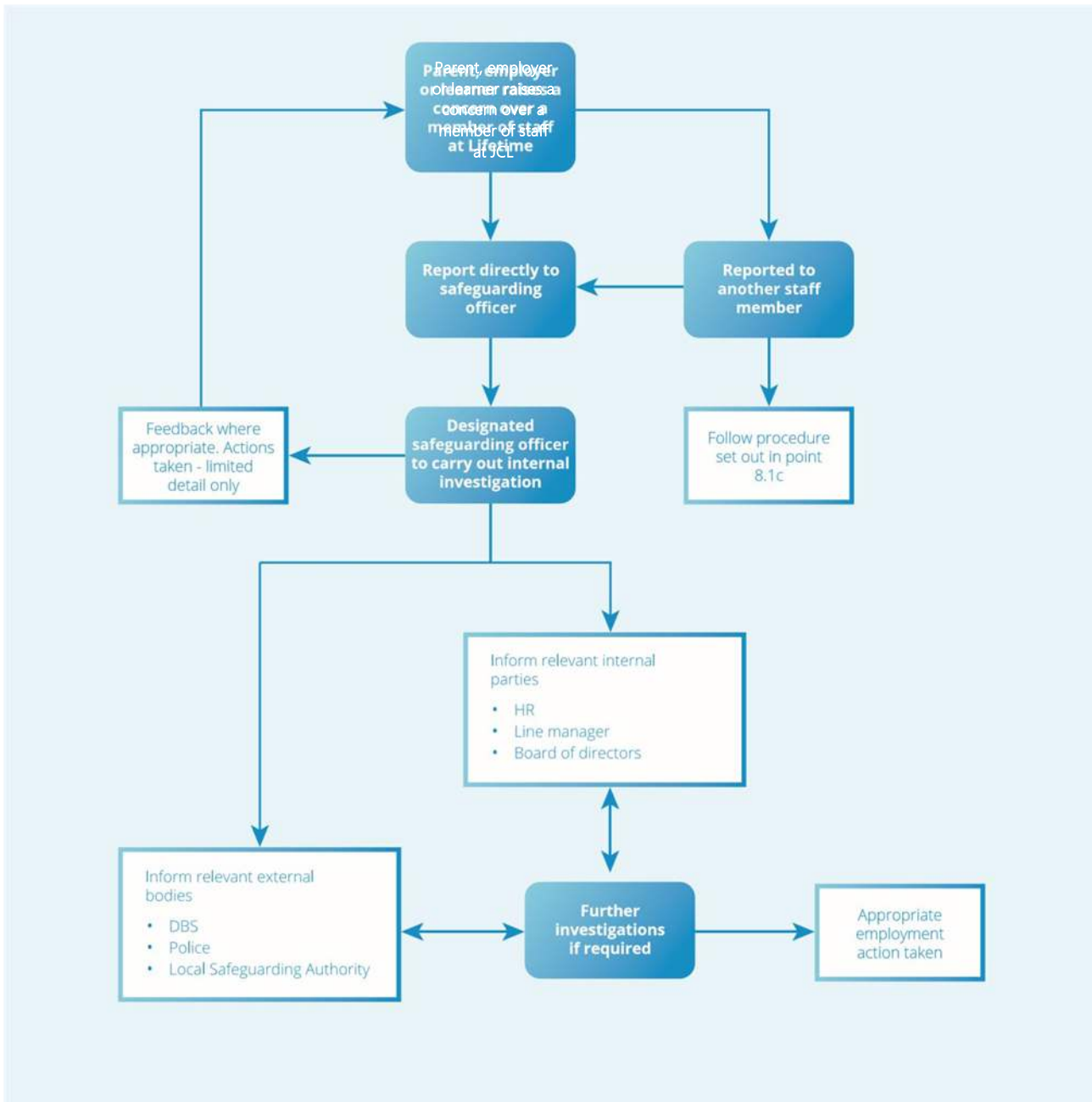
In some cases, an applicant may already have received a satisfactory disclosure report for their current or a previous position at JCL. It may be appropriate to use the existing report to assess suitability for the post, taking account of the date the report was produced and similarities between the two positions. A member of the People Team should be consulted in such cases.

Disclosure reports for applicants with a substantial record of overseas residence, including current UK residents and British nationals, may not include information on convictions from outside the UK. In most circumstances however, a disclosure report should still be sought. The DBS can also offer guidance on the availability of criminal record checks in a variety of foreign countries and the applicant can be requested to obtain the equivalent checks from the country in question, where available.

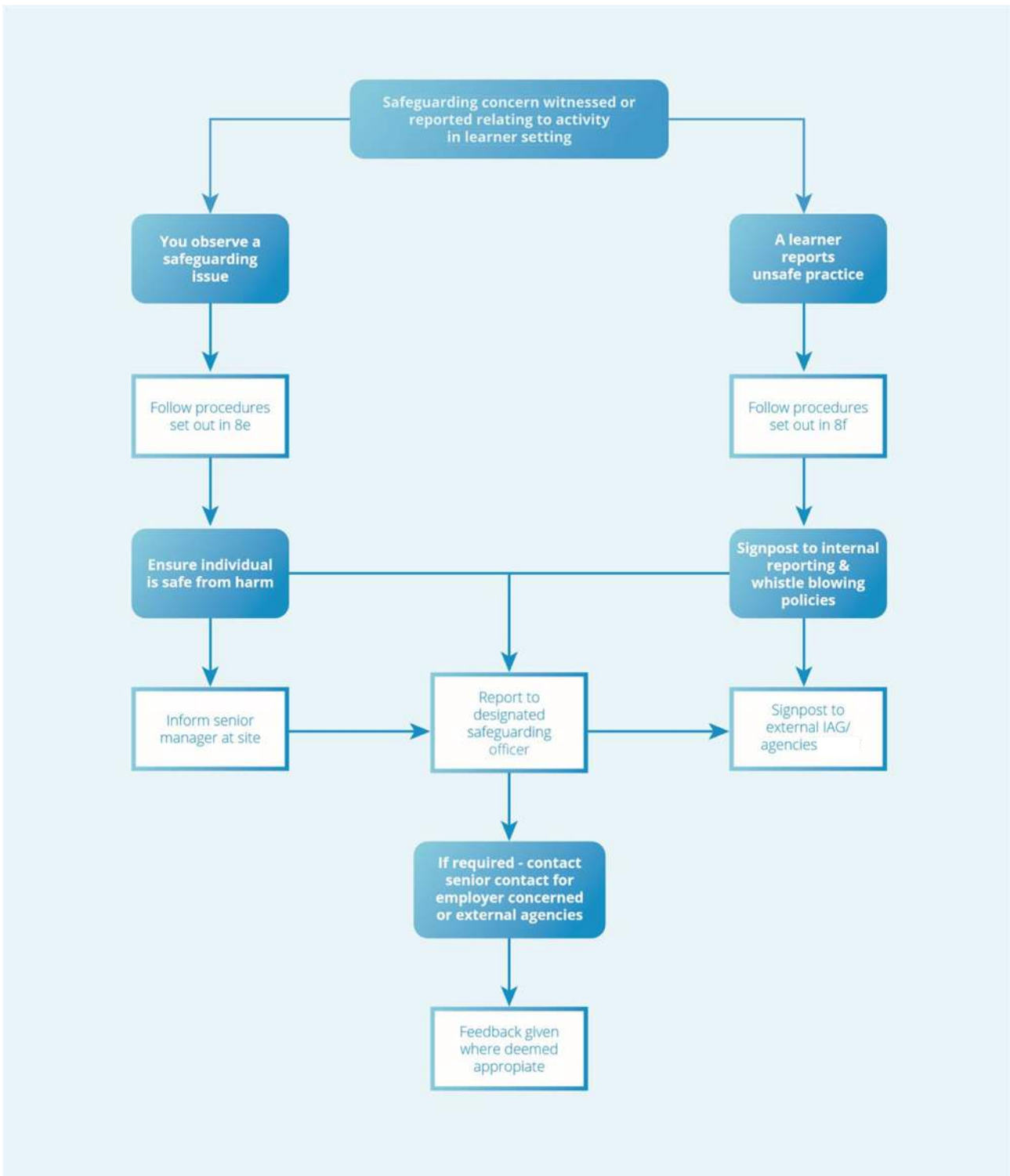
D1. LEARNER SAFEGUARDING CONCERNS



D2 PARENT, EMPLOYER OR LEARNER RAISES A CONCERN OVER JCL TEAM MEMBER



D3. SAFEGUARDING CONCERN WITNESSED OR REPORTED RELATING TO ACTIVITY IN LEARNER SETTING



APPENDIX E DETAILED PROCEDURE FOR DEALING WITH SAFEGUARDING CONCERNS

Recognition

Signs of abuse can be difficult to spot, as can a learner trying to find the right language to tell you about a concern. If you have any concerns over the welfare of the learner from what you have seen, heard, discussed with the learner or you have noticed changes in their behaviour which cause you safeguarding concerns, you must report it to the designated person. You do not personally have to believe the concerns in order to raise them, any concerns raised should be taken seriously. See appendix F for indicators of abuse to help.

Response

No report or concerns about possible abuse should be ignored. Your main role here is to listen and record with no judgements or leading questions; use open question to gather factual details – when did it take place, who said what, what happened? You must stay calm and not let the learner know if you feel panicked or shocked. Do not make any promises about what will happen next, but only that you will pass it onto the designated person within JCL, and that we will do everything we can to help. It is good practice to show support and reassurance but be mindful to maintain a situation where you do not put yourself at risk. It would also be useful to have information regarding current agency support – i.e. have the police already been informed, is the person receiving local authority or medical support?

Record

Ensure you record notes of the incident or disclosure as close to the time as possible. The notes should be dated and signed where possible. The notes should detail what you saw/heard or what was discussed with an individual, the names of those involved and the time, location and what action you took. Use the disclosure form where possible, but any form of notes will be acceptable.

Report

Report the concerns to the designated person, ensuring you have recorded all details as above. This communication can be face to face, via email, or phone call followed up by email. All communication and documents will remain confidential between the designated person and individual that has reported it, unless the designated person deems it appropriate to take further action and involve other agencies.

Referral

The designated person will then take the decision of what course of action should be taken. Only the designated person should be taking the decision to make referrals outside of the organisation.

APPENDIX F INDICATORS OF ABUSE

SAFEGUARDING ISSUE	DEFINITION	INDICATORS
PHYSICAL ABUSE	Deliberately causing physical harm	<ul style="list-style-type: none"> • Cuts, bruises, burns, • Wearing long sleeved clothes • Pain • Cowering
NEGLECT	<p>The persistent failure to meet a person’s basic physical and/or psychological needs, likely to result in serious impairment of health or development.</p> <p>Neglect is when a parent or carer fails to provide adequate food, clothing, shelter (including exclusion from home or abandonment), medical care, or protection from physical and emotional harm or danger</p>	<ul style="list-style-type: none"> • Withdrawn • Weight loss • Fear of going home • Improper hygiene • Confusion • Inappropriate clothing
SELF-NEGLECT	Neglecting to care for one’s personal hygiene, health or surroundings and includes behaviour such as hoarding	<ul style="list-style-type: none"> • Poor diet and nutrition • Poor personal hygiene • Not taking prescribed medication • Substance misuse • Doesn’t always encompass all aspects of life.
PSYCHOLOGICAL ABUSE	Emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive	<ul style="list-style-type: none"> • Withdrawn • Depression • Lack of confidence • Socially awkward • Easily manipulated

SAFEGUARDING ISSUE	DEFINITION	INDICATORS
	networks.	
FINANCIAL ABUSE	Theft, fraud, internet scamming, coercion in relation to an adult’s financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or	<ul style="list-style-type: none"> • Change in appearance • Having expensive gadgets • Having no money • Not eating properly
	misappropriation of property, possessions or benefits.	
SEXUAL ABUSE	Forcing or enticing a child or young person or any person to take part in sexual activities, whether or not the person is aware of what is happening, could also be indecent exposure or sexual harassment.	<ul style="list-style-type: none"> • Spending a long time in the toilet • Discomfort in sitting down • Inappropriate behaviour
ORGANISATIONAL ABUSE	Neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one’s own home.	<ul style="list-style-type: none"> • Activity defined by a regime/task orientated setting • Dismissive of complaints. <p>Learner may need</p>

SAFEGUARDING ISSUE	DEFINITION	INDICATORS
	<p>This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.</p>	<p>to leave at certain times</p> <ul style="list-style-type: none"> • Ask permission to do everything • Appear brainwashed
<p>DISCRIMINATION</p>	<p>The unjust or prejudicial treatment of different categories of people, especially on the grounds of one of the protected characteristics</p>	<ul style="list-style-type: none"> • Fearful of certain people • Avoiding certain situations • Being asked to do more work than they should
<p>CHILD SEXUAL EXPLOITATION</p>	<p>Sexual abuse involves forcing or enticing a child or young person or any person to take part in sexual activities, whether or not the person is aware of what is happening, could also be indecent exposure or sexual harassment.</p>	<ul style="list-style-type: none"> • Change in behaviour • Change in appearance • Increased sexualised behaviour/language • Drug/alcohol abuse • Suddenly wearing expensive things
<p>BULLYING (INC. CYBERBULLYING)</p>	<p>Behaviour by group of individuals repeated over time that intentionally hurts another individual or group either physically or emotionally (can be face to face, over text, social media exchanges) ,Also Includes prejudice-based and</p>	<ul style="list-style-type: none"> • Withdrawn/nervous • Signs of physical and emotional abuse • Constant use of or fear of internet usage

SAFEGUARDING ISSUE	DEFINITION	INDICATORS
	<p>discriminatory bullying have. Can link in with per on peer abuse</p>	
<p>CYBER CRIME</p>	<p>Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include;</p> <ul style="list-style-type: none"> • unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded; • denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and, • making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to 	

SAFEGUARDING ISSUE	DEFINITION	INDICATORS
	<p>commit further offence, including those above.</p> <p>Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.</p>	
DOMESTIC ABUSE	<p>Incident of pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who have been intimate partners or family</p>	<ul style="list-style-type: none"> • Signs of physical or emotional abuse • Show signs of being controlled • Withdrawn
	<p>members, can also be honour based</p>	<ul style="list-style-type: none"> • Anxious around others • Low self esteem
DRUGS	<p>Alcohol, tobacco, illegal drugs, medicines or psychoactive substances</p>	<ul style="list-style-type: none"> • Smelling of alcohol • Regular hangover symptoms • Inability to concentrate • Lateness • Change in commitment levels
FABRICATED OR INDUCED ILLNESS	<p>Making up signs and symptoms of an illness, falsifying medical records or inducing an illness to someone by any means</p>	<ul style="list-style-type: none"> • Child could pretend to be ill, think ill, and talk about persons taking them to Drs or hospital • Parents could talk about child

SAFEGUARDING ISSUE	DEFINITION	INDICATORS
		<p>consistent illness</p>
<p>FAITH ABUSE</p>	<p>Child abuse related to faith or belief, include concepts of witchcraft and spirit possession, rituals and sacrificial murders</p>	<ul style="list-style-type: none"> • Talking about beliefs and faith related activities • engaged or family engaged with
<p>FORCED MARRIAGE AND HONOUR BASED ABUSE (LEGISLATION CHANGE 2023)</p>	<p>Forced marriage is when you face physical pressure to marry (for example, threats, physical violence or sexual violence) or emotional and psychological pressure (for example, if you're made to feel like you're bringing shame on your family).</p> <p>If you're under 18 any marriage is considered a forced marriage, even if there is no physical or emotional pressure involved.</p> <p>Forced marriage is illegal in England and Wales. This includes taking someone overseas to force them to marry (whether or not the forced marriage takes place), arranging a marriage for someone who lacks mental capacity (whether they're pressured to or not),</p>	<ul style="list-style-type: none"> • Travel abroad recently • Talking about getting married/meeting men through family connections • Upholding religious duties

SAFEGUARDING ISSUE	DEFINITION	INDICATORS
	<p>arranging a marriage for someone before they turn 18</p> <p>Forcing someone to marry can result in a sentence of up to 7 years in prison</p>	
<p>BREAST IRONING</p>	<p>The pounding and massaging of a pubescent girl's <u>breasts</u>, using hard or heated objects, to try to make them stop developing or disappear. It is typically carried out by the girl's mother who will say she is trying to protect the girl from sexual harassment and rape to prevent early pregnancy that would tarnish the family name, or to allow the girl to pursue education rather than be forced into <u>early marriage</u></p>	<ul style="list-style-type: none"> • Unusual behaviour after an absence from school or college including depression, anxiety, aggression, withdrawn etc. • Reluctance in undergoing normal medical examinations • Some girls may ask for help, but may not be explicit about the problem due to embarrassment or fear • Fear of changing for physical activities due to scars showing or bandages being visible
<p>GANGS AND YOUTH VIOLENCE</p>	<p>Gangs where crime and violence are a core part of their identity. It can lead to increased anti-social behaviour and youth offending</p>	<ul style="list-style-type: none"> • May have expensive items • Change in behaviour • Bruises/cuts • Social activities change • Gang tattoos • Carrying weapons

SAFEGUARDING ISSUE	DEFINITION	INDICATORS
PRIVATE FOSTERING	Fostering arrangement without consent of local authority. There is a mandatory duty to report concerns of this nature to the local authority	<ul style="list-style-type: none"> • Moving to different homes regularly • Not discussing family life • Abandonment characteristics
FEMALE GENITAL MUTILATION (FGM)	Partial or total removal of female external genitalia or injury to another part of the female genitalia for non - medical reason. There is a mandatory duty to report concerns of this nature in relation to under 18s to the Police	<ul style="list-style-type: none"> • Spending a long time in the toilet • Uncomfortable sitting down • Long trips away from home
GENDER BASED VIOLENCE	Violence (either physical or sexual) towards women/men	<ul style="list-style-type: none"> • Withdrawn • Nervous • Physical signs of abuse
RADICALISATION ALIGNS TO THE PREVENT STRATEGY . WHICH AIMS TO REDUCE THE THREAT TO THE UK FROM TERRORISM BY STOPPING PEOPLE BECOMING TERRORISTS OR SUPPORTING TERRORISM. THE PREVENT STRATEGY HAS THREE SPECIFIC	Process by which a person comes to support/partake in terrorism and extremism (also includes – political/animal rights and ecological extremist). Extremism is ideology that is considered to be far outside the acceptable mainstream attitudes of society. – include	<ul style="list-style-type: none"> • Long trips away from home • Talking about being wronged by a state or political system • Strong views about changing life

SAFEGUARDING ISSUE	DEFINITION	INDICATORS
<p>STRATEGIC OBJECTIVES:</p> <p>4. RESPOND TO THE IDEOLOGICAL CHALLENGE OF TERRORISM AND THE THREAT WE FACE FROM THOSE WHO PROMOTE IT</p> <p>5. PREVENT PEOPLE FROM BEING DRAWN INTO TERRORISM AND ENSURE THAT THEY ARE GIVEN APPROPRIATE ADVICE AND SUPPORT.</p> <p>6. WORK WITH SECTORS AND INSTITUTIONS WHERE THERE ARE RISKS OF RADICALISATION THAT WE NEED TO ADDRESS.</p>	<p>opposition to British values.</p>	<ul style="list-style-type: none"> • Talk of harming others in plight for cause
<p>SEXTING</p>	<p>Exchange of self-generated sexually explicit images through mobile picture messages including the sharing of nude and semi-nude images</p>	<ul style="list-style-type: none"> • Withdrawn • Boasting • Hiding mobile phones
<p>TEENAGE RELATIONSHIP ABUSE</p>	<p>Abuse in intimate personal relationships between peers either physical, emotional, financial, sexual causing someone to engage in sexual activity without their consent (for example, forcing someone to strip, touch themselves sexually, or to</p>	<ul style="list-style-type: none"> • Withdrawn • Constantly responding to messages/calls • Detect a control aspect • Physical signs of abuse

SAFEGUARDING ISSUE	DEFINITION	INDICATORS
	engage in sexual activity with a third party).	
TRAFFICKING AND MODERN SLAVERY	Encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment	<ul style="list-style-type: none"> • Talking about travelling abroad • Talking about someone else having control over them • Moving homes regularly • Avoid eye contact and appear frightened • No identification documents • Physical or emotional abuse.
MENTAL HEALTH	emotional disorders, for example phobias, anxiety states and depression; • conduct disorders, for example stealing, defiance, fire-setting, aggression and anti-social behaviour; • hyperkinetic disorders, for example disturbance of activity and attention; • developmental disorders, for example delay in acquiring	<ul style="list-style-type: none"> • Becoming more withdrawn • Changes in behaviour or personal appearance • Less punctual than normal, less interest

SAFEGUARDING ISSUE	DEFINITION	INDICATORS
	<p>certain skills such as speech, social ability or bladder control, primarily affecting children with autism and those with pervasive developmental disorders; • attachment disorders, for example children who are markedly distressed or socially impaired as a result of an</p>	
	<p>extremely abnormal pattern of attachment to parents or major care givers; • Trauma disorders, such as post-traumatic stress disorder, as a result of traumatic experiences or persistent periods of abuse and neglect; 12</p> <ul style="list-style-type: none"> • other mental health problems including eating disorders, habit disorders, somatic disorders; and psychotic disorders such as schizophrenia and manic depressive disorder <p>N.B - mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.</p> <p>If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the Safeguarding policy</p>	

SAFEGUARDING ISSUE	DEFINITION	INDICATORS
<p>CHILDREN MISSING (OR ABSENT) IN EDUCATION (WHILE THIS AFFECTS 14-16-YEAR OLDS IN COMPULSORY EDUCATION, THE RECENT LEGISLATION REQUIRING ALL CHILDREN TO STAY IN SOME FORM OF EDUCATION OR TRAINING TILL AGE 18 MEANS THAT WE SHOULD INVESTIGATE ANY LEARNERS THAT GO MISSING WITHOUT TRACE WITH THIS AGE RANGE)</p>	<p>Children missing education are children of compulsory school age who are not registered pupils at a school and are not receiving suitable education otherwise than at a school.</p> <p>Children ABSENT from education could lead to children missing in education, absences should be monitored Children missing education are at significant risk of underachieving, being victims of harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life.</p>	<ul style="list-style-type: none"> • Not showing up for visits with no explanation • Not contactable • Neither JCL nor employer can get hold of them or knows where they have gone
	<p>learners who begin to disengage with programmes are subject to JCL escalation process supported by partnerships team liaison with employers in order to contact and re-engage. Any uncontactable learners are referred to the safeguarding team. Any learners aged under 18 who withdraw from learning are relayed to the local authority.</p>	
<p>SEXUAL HARASSMENT AND VIOLENCE (INCLUDING CHILD ON CHILD ABUSE)</p>	<p>Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.</p>	<ul style="list-style-type: none"> • Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT

SAFEGUARDING ISSUE	DEFINITION	INDICATORS
	<p>Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Sexual assault is intentional touching of a sexual nature, where the other party does not consent. When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference</p>	<p>children are at greater risk Whilst not intended to be an exhaustive list, OFSTED review stated Girls often view it harassment where as boys can view as banter sexual harassment can include:</p> <ul style="list-style-type: none"> • Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names • Children being the victim of abuse or harassment may avoid social interaction, be withdrawn, be self-conscious, use sexualised language
	<p>sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. It also includes Rape, assault by penetration, sexual assault,</p>	<ul style="list-style-type: none"> • Sexual harassment should be deemed as it is taking place even if not reports of it - as many young people view as behaviour that just happens and don't bother reporting it • Observe and address inappropriate behaviours

SAFEGUARDING ISSUE	DEFINITION	INDICATORS
	sexual comments, sexual jokes or taunting, physical behavior, online sexual harassment, non- consensual sharing of sexual images and video , sexting and Upskirting	
COUNTY LINES	Organised criminal distribution of drugs from the big cities to smaller towns and rural areas using children and vulnerable people. The main county line gangs operate from Liverpool and London, but other groups operate in Birmingham and Manchester. The influence is nationwide. These drug networks or gangs groom and exploit children and young people to carry drugs and money. N.B can still be exploitation even if the activity appears consensual.	<ul style="list-style-type: none"> • 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 Young and vulnerable people may exhibit: • Persistently going missing from school or home

Safeguarding Policy

SAFEGUARDING ISSUE	DEFINITION	INDICATORS
		and/or being found out-of-area <ul style="list-style-type: none">• Unexplained acquisition of money, clothes, or mobile phones

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Case N°.

APPENDIX G DISCLOSURE RECORDING FORM

Learner Name

Location/Name of Site

DOB

JCL Staff Name

Date of Disclosure

Details of the concern

(Action) - For Safeguarding Team only