

Safeguarding & Prevent Policy.

Safeguarding

Statutory Framework

1. JGW Training Ltd (t/a Ascento) will carry out its responsibilities under all relevant legislation, regulations and formal guidance for the protection of children and adults at risk, as stated in the Education Act 2002.
2. The Children Act 1989 provides the legal framework for the protection of children in the UK. Under the Children Act a child is defined as any person under 18 years of age.
3. The Care Act 2014 provides the legal framework for the protection of adults at risk in the UK. An adult at risk is any person who is aged 18 years or over and at risk of abuse or neglect because of their needs for care and or support.
4. The Protection of Children Act 1999 requires employers to carry out criminal checks with Disclosure and Barring Service before employees are allowed to come into contact (in line with the regulated activity guidelines) with children and adults at risk. JGW Training Ltd (t/a Ascento) is required under this legislation to apply for an enhanced disclosure from the Disclosure and Barring Service for employees working with such learners.
5. Working Together to Safeguard Children (2018) is a Government Guidance document which sets out how all agencies and professionals should work together to promote children and adults at risk welfare and protect them from abuse and neglect and requires us to follow the procedures for protecting children from abuse. The guidance is clear that we are also expected to ensure that they have appropriate procedures in place for responding to situations in which they believe that a learner/student has been abused or is at risk of abuse – these procedures should cover circumstances in which an employee is accused or suspected of abuse.
6. DfEs Keeping Children Safe in Education September 2019 derives from the Education Act 2002 and places the following responsibilities in Safeguarding and promoting the welfare of children:
 - Employees should be alert to signs of abuse and know to whom they should report any concerns or suspicions;
 - A Designated Safeguarding Lead should have responsibility for co-coordinating action within JGW Training Ltd (t/a Ascento) and for liaising with other agencies;
 - Employees with designated responsibility for children and adults at risk's protection, should receive appropriate training;
 - Educational Organisations should be aware of and follow the procedures established by the LSCBs and, where appropriate, by the Local Education Authority or Children's Social Care (England)/Social Services Department (Scotland); and
 - Educational Organisations should have procedures, of which all employees are aware, for handling suspected cases of abuse of children, including procedures to be followed if an employee is accused of abuse. Section 175 of the Education Act 2002 requires providers to safeguard and promote the welfare of children and adults at risk. JGW Training Ltd (t/a Ascento) will follow any guidance issued on this section of the Act. JGW Training Ltd (t/a Ascento) will keep its policy and procedures on safeguarding under review to take account of any new Government legislation, regulations, or best practice documents to ensure that employees are kept fully up to date with their responsibilities and duties with regard to the safety and well-being of children and adults at risk.

7. Safeguarding Partners bring together all services for children and young people in a local area to focus on improving outcomes for all children and young people. The aim of the Safeguarding partners is to make arrangements to identify and review serious child safeguarding cases which, in their view, raise issues of importance in relation to their area. They must commission and oversee the review of those cases, where they consider it appropriate for a review to be undertaken.

8. A safeguarding partner in relation to a local authority area in England is defined under the Children Act 2004 (as amended by the Children and Social Work Act, 2017), as:

- The local authority;
- A clinical commissioning group for an area any part of which falls within the local authority area; and
- The chief officer or policy for an area any part of which falls within the local authority area.

Safeguarding Adult Boards

9. The aim of the Safeguarding Adults Board Section 43 of the Care Act requires every Local Authority to establish a Safeguarding Adults Board (SAB) for its area. The SAB operates at a strategic level, helping and protecting adults in its area from abuse and neglect through co-ordinating and reviewing a multi-agency approach across all member organisations. The approach that the SAB takes directly influences how frontline safeguarding operations are undertaken in each member organisation.

10. Although the Local Authority is responsible for establishing and maintaining a SAB the SAB is concerned with much more than the safeguarding activity of the Local Authority. It oversees and leads on all adult safeguarding across the entire locality area. To do this effectively it must concern itself with a whole range of matters, including but not limited to:

- The safety of patients in its local health services (commissioned and non-commissioned);
- The quality of local Care and Support services (commissioned and non-commissioned);
- The effectiveness of prisons in safeguarding vulnerable offenders;
- How effectively further education services safeguard adults;
- To gather intelligence about the whole range of matters the SAB must concerns itself with it must have representation from each area. Collaboration and co-operation are key to the effectiveness of the SAB.

11. Prevent - Section 26 of the Counter-Terrorism and Security Act 2015 the Act places a duty on certain bodies, in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". Further information on Prevent can be found in within the Prevent Section of this policy.

12. In addition to the statutory obligation;

- JGW Training Ltd (t/a Ascento) has a duty of care towards all students and has a responsibility to have a Child and Vulnerable Adult Protection (Safeguarding) Policy in place and bring it to the attention of all staff.
- JGW Training Ltd (t/a Ascento) has a role to play, in partnership with other agencies, to provide appropriate support and care for children under the age of 18 and vulnerable individuals who choose to disclose abuse.
- JGW Training Ltd (t/a Ascento) have a collective and individual duty to ensure that their employees fulfil their responsibilities to safeguard and promote the welfare of children and adults at risk, and to prevent child abuse and to report any abuse discovered or suspected. This includes employees taking complete responsibility for ensuring they adhere to this too.

13. For the purposes of this document, Safeguarding is defined as:

- Protecting children* from maltreatment and extremism
- Preventing impairment of children's healthier development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

14. This is the definition used in the Children Act 2004 and the DCSF (now Department for Education) guidance document Working together to Safeguard Children (2013, page 7.2), which focuses on safeguarding. In addition, the Counter-Terrorism and Security Act 2015 contains a duty on specified authorities to have due regard to the need to prevent people from being drawn into extremism/terrorism.

*In this context the term 'children' should be taken to include all young people and vulnerable adults.

Policy Promotion

1. This policy will be promoted to all employees, associates, sub-contractors, learners and employers. This will include the following:

- All employees will be required to confirm they have read and understood the terms of this policy as part of their induction. Staff will sign to confirm.
- All associates and sub-contractors will sign agreements to confirm they have read and will abide by the terms of the policy.
- All learners are required to read the policy and confirm that they have done so. This is recorded via the electronic portfolio system that they use.
- All employers are required to confirm that they will abide by our policy terms.

Policy Statement

1. JGW Training Ltd (t/a Ascento) is committed to the rights of young people and vulnerable adults studying at all locations. All staff working under the auspices of JGW Training Ltd (t/a Ascento) have a responsibility for safeguarding and promoting the welfare of young people and vulnerable adults.

2. JGW Training Ltd (t/a Ascento) will act in ways that facilitate the development of good practice including;

- preventing abuse through safe recruitment policies for staff,
- providing safe and secure environments for learning and learner support systems where young people; and
- vulnerable adults feel they can speak out.

3. In line with current legislation and best practice guidance JGW Training Ltd (t/a Ascento) encourages students to make informed decisions and choices about their own lives.

4. Therefore JGW Training Ltd (t/a Ascento) response to its role in safeguarding the welfare of the people concerning protection is:

- To work together with the local area Adult and Child Protection Committee, Children's trusts and other responsible agencies;
- To refer the person to Social Services or other appropriate agencies, eg Police, NSPCC, when the person requests this;
- To ensure the person is offered all possible support;
- To provide appropriate training to all relevant members of staff to ensure that they are aware of the issue of child and vulnerable adult protection and the procedures that follow;
- To review and monitor JGW Training Ltd (t/a Ascento) Vulnerable Person Protection procedures annually or earlier if legislation requires;

5. For clarity the primary responsibility for the welfare of Pre-16 children on school rolls remains with the home and any incident or issue concerning child protection should be referred to the school's named person.

Purpose

1. The aim of this policy is to safeguard and promote the welfare of young people and vulnerable adults in education and training at all sites of JGW Training Ltd (t/a Ascento).

2. The objectives are to:

- Ensure that all staff are aware of their responsibilities in relation to child protection;
- Provide clear procedures that will be implemented when a child protection issue is Indicated; and
- Provide guidelines for staff to whom a disclosure is made

Policy Details

1. Definitions

A Child or Young Person: The legislation specifically refers to any person who is under the age of 18 years.

Vulnerable Adults aged 18 or over: A vulnerable adult is defined as a person who has either a dependency upon others in the performance of, or a requirement for, assistance in the performance of basic functions; a severe impairment in the ability to communicate with others, or has a reduced ability to protect himself or herself from assault, abuse or neglect. This can be as a result of a learning or physical disability (not normally to include dyslexia) a physical or mental illness chronic or otherwise (including an addiction to alcohol or drugs) or a reduction in physical or mental capacity.

Significant Harm: Significant harm is the threshold that provides for intervention by other agencies.

Abuse/Neglect: Neglect is the persistent failure to meet a young person's or vulnerable adult's basic physical and/or psychological needs, likely to result in the serious impairment of their health or development. This includes cold, starvation or any aspect of care which could result in significant impairment of an individual's well-being or development. For example:

- Failure to keep a person clean, warm and healthy
- Failure to provide reasonable care
- Failure to give prescribed medication
- Failure to provide adequate supervision
- Failure to give privacy and dignity of care
- Failure to give access to appropriate medical care
- Failure to provide nourishment

Note this is not an exhaustive list but guidance as to what may suggest abuse.

The Police and Social Services have prime responsibility under the Children's Act 2004 and this places the duty of care on local authorities to take action to protect vulnerable persons in particular circumstances and it gives powers to the police enabling them to take action to protect.

Other examples include failing to protect from physical harm or failure to provide appropriate medical care.

Physical Abuse: Physical injury or unreasonable physical constraint to an individual where there is definite knowledge or reasonable suspicion that the injury was inflicted or knowingly not prevented. For example:

- Assault
- Slapping, scratching, hitting, burning/scalding
- Misuse of medication, deliberate poisoning
- Suffocation, pushing, rough handling

Financial Abuse: Misappropriation of an individual's funds or other actions that are against the person's best interests. For example:

- Theft of money, possessions, property or other material goods
- Misuse of money
- Fraud or extortion of material assets

Psychological/Emotional Abuse: Actions that are not of a physical nature but severely affect the psychological well being of the individual for example conveying to them that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of the other person. Some level of emotional abuse is involved in all types of ill treatment of a young person or vulnerable adult, although it may also occur alone. Other examples include:

- Humiliation or ridicule
- Threat or punishment or exclusion.
- Verbal assault including bullying

Where young learners or adults are working in a class/group, staff are charged with monitoring learners' behaviour and are asked to act promptly on any suspicion or report of bullying or harassment. (see JGW Training Ltd (t/a Ascento) policy on Harassment)

Sexual Abuse: Sexual abuse involves forcing or enticing a young person or vulnerable adult to take part in sexual activities to which they may not have given consent or may not fully comprehend. The activities may involve physical contact or non-penetrative acts including non-contact activities such as the production of pornographic material or watching sexual activities or encouraging a young person or vulnerable adult to behave in a sexually inappropriate way. For example:

- Inappropriate touching or sexual acts including rape or attempted rape
- No Contact Abuse eg Pornography
- Sexual harassment

Discriminatory Abuse: Is abuse that is racist, sexist or linked to a person age or disability.

Child sexual exploitation: Is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur using technology.

Child Criminal Exploitation: County Lines Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered.

Domestic abuse: The cross-government definition of domestic violence and abuse is: Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality.

Female Genital mutilation (FGM): Is a criminal offence. It is child abuse and a form of violence against women and girls. Female genital mutilation comprises all procedures involving the partial or total removal of the female external genitalia or other injury to the female genital organs for nonmedical reasons.

Forced marriage: Is one entered without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture to coerce a person into marriage.

Homelessness: Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The safeguarding team are aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. the designated safeguarding lead should ensure appropriate referrals are made based on the child's circumstances.

‘Honour’ based violence (HBV): Encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so-called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the designated safeguarding lead.

Peer on peer abuse: Children can abuse other children. This is generally referred to as peer on peer abuse and can take many forms. This can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals. 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. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, likely, 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.

Designated Staff with responsibility for Child Protection

1. Child Protection Officers

- The designated senior member of staff with responsibility for child protection - the Lead Child Protection Officer is the Quality Manager. Other designated members of staff include the members of the board of directors. Issues relating to child protection may be reported to one of three members of staff.

2. Designated members of staff are responsible for:

- Overseeing the referral of cases of suspected abuse or allegations to the relevant external agencies
- Providing advice and support to staff on issues relating to child protection
- Maintaining proper records of any child protection referral or concern (even when the concern does not lead to a referral)
- Ensuring that staff are aware of the Child Protection Policy
- Ensuring that other stakeholders including parents, guardians and carers are aware of the policy
- Liaising with the HR Manager over any issues or allegations concerning members of staff

7. Confidentiality Statement

1. JGW Training Ltd (t/a Ascento) will operate on the premise that all information imparted to a member of staff will be treated in confidence irrespective of the nature of the disclosure. Therefore consistent with all other policies information will not be passed on without the learner’s consent, except in exceptional circumstances when it is necessary to breach confidentiality. These situations are outlined below:

- in matters relating to child protection
- where there is a perceived “immediate and significant” threat to life
- where the information will help to prevent a criminal offence from being committed

2. Any decision to break confidentiality should always be preceded by informing the learner of what is about to happen and the reason for the decision. It is therefore essential that members of staff understand what is meant by the above and for that reason do not promise absolute confidentiality to the learner in such situations.

Prevent

Introduction

1. Another aspect of safeguarding is the PREVENT duty, which requires the Education sector to have “due regard to the need to prevent people from being drawn into terrorism”, supporting terrorism or being drawn into non-violent extremism. Counter-Terrorism and Security Act Sect 26 CTS Act places a duty on certain bodies to have “due regard to the need to prevent people from being drawn into terrorism”.

2. Guidance is issued under Section 29 of the Act:

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

3. JGW Training Ltd (t/a Ascento) recognises its responsibilities to protect students from the risk of radicalisation as part of its overall safeguarding responsibilities and that we have a responsibility to “have due regard to the need to prevent people from being drawn into terrorism”.

4. PREVENT is part of the Home Office and the Police counter-terrorism strategy and aims to stop people from becoming terrorists or supporting terrorism by working with individuals and communities to address issues before they become a criminal matter to stop people moving from extremism into terrorist-related activity.

5. The Purpose of Prevent:

- Prevent aims to safeguard vulnerable individuals (both adults and children) who may be at risk of potentially becoming involved in terrorist activities.
- It also aims to support institutions, such as schools, colleges and universities where this may happen.
- All frontline staff have a responsibility to report any instances where they think they have identified a Safeguarding issue to their Safeguarding Officer Responsibilities All provider staff have a legal responsibility under the Prevent Duty to make sure that:
 - They have undertaken training in the Prevent Duty as identified by their management
 - They are aware of when it is appropriate to refer concerns about learners to the Prevent officer, usually the provider’s Safeguarding officer
 - They exemplify British values of “democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs” into their practice

6. The Prevent Strategy will specifically:

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

Policy Promotion

1. This policy will be promoted to all employees, associates, sub-contractors, learners and employers. This will include the following:

- All employees will be required to confirm they have read and understood the terms of this policy as part of their induction. Staff will sign to confirm.
- All associates and sub-contractors will sign agreements to confirm they have read and will abide by the terms of the policy.
- All learners are required to read the policy and confirm that they have done so. This is recorded via the electronic portfolio system that they use
- All employers are required to confirm that they will abide by our policy terms.

Context

1. People of any age, but in particular young people in the UK, are potentially vulnerable to engagement with extremist ideologies or to targeting by extremist organisations. Learning providers and others who engage with young people, should be aware of these risks and be familiar with the support networks and processes in place to protect vulnerable individuals from becoming radicalised or drawn into terrorism.

2. JGW Training t/a Ascento works nationally across a variety of dispersed locations, in which the Home Office defined risks of radicalisation vary considerably. We therefore need a support network in place for staff and learners that includes a central point of access. This is provided by effective communication with the BIS East Midlands PREVENT Co-ordinator, and ongoing links with other regional leads.

Definitions

CONTEST is the Government's Counter Terrorism Strategy, published in July 2006 and refreshed in March 2009. The aim of the strategy is 'to reduce the risk from international terrorism, so that people can go about their lives freely and with confidence.' CONTEST has four strands, often known as the four Ps. The aims of the 4 Ps are:

- PREVENT - to stop people becoming terrorists or supporting violent extremism
- PURSUE - to stop terrorist attacks through disruption, investigation and detection
- PREPARE - where an attack cannot be stopped, to mitigate its impact
- PROTECT - to strengthen against terrorist attack, including borders, utilities, transport infrastructure and crowded places

What is Extremism? The Government has defined extremism as "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". This also includes calls for the death of members of the British armed forces

What is Terrorism? An action that endangers or causes serious violence to a person/people, causes serious damage to property or seriously interferes or disrupts an electronic system. The use of threat must be designed to influence the Government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

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

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

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

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

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

There is no typical gender, age, religion or background that extremists will target, but they use a sense of 'duty' (belonging to a specific group), 'status' (need for reputation), and 'spiritual rewards' (test of faith), as a way of drawing them in. This raises the question of what those signs of radicalisation will look like: they will look a lot like other troubling behaviour:

- Emotional: anger, mood swings, a new-found arrogance
- Verbal: expression of opinions that are at odds with generally-shared values
- Physical: changes in appearance or routine.

PREVENT Procedure: Detecting and Preventing Radicalisation and Extremism

1. Reporting forms are in place that staff use to report any prevent or safeguarding issues that are then logged and monitored by the Quality Manager and / Senior Management Team. Centre meetings, SMT meetings and HoD meetings are held monthly with PREVENT and Safeguarding included within the agenda.

2. There is an internal support mechanism for both staff and learners for safeguarding, and these will also apply for the PREVENT procedure. We outline who staff and learners should contact if they wish to raise concerns.
3. JGW Training t/a Ascento has developed links with external agencies who can provide support in this area. If, once internal processes are completed, we consider that additional external support or referral is required then this may be arranged by the Safeguarding Team. External support will normally involve an individual being asked to voluntarily receive tailored support from relevant external individuals or organisations.

External support:

We have links with all regional Prevent Leads. Our regional contact for East Midlands is;

Sam Slack

East Midlands Regional Prevent Coordinator HE/FE (G7)

sam.slack@education.gov.uk

07384452156

Mandatory Staff Training

1. Mandatory internal training around Prevent and their responsibility is completed by all staff during their induction and renewed on an annual basis.
2. E- learning course <https://www.elearning.prevent.homeoffice.gov.uk/home>

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

1. JGW Training t/a Ascento has adopted the approach of 'notice & share' where there are concerns that an individual may be vulnerable.
2. Notice: recognise any changes in behaviour or appearance similar to those outlined above.
3. Share: speak to someone you trust like your tutor and share your concerns. Remember to trust your instinct. The Tutor will listen and advice the next steps that may include referring to the prevent link and / or safeguarding officer.
4. Guidance:
 - If you are a learner and you notice a concern about another learner, share with your tutor
 - If you are a learner and you notice a concerned about a member of staff, or a person representing JGW Training t/a Ascento, share with Sam Slack East Midlands Regional Prevent Coordinator HE/FE (G7) sam.slack@education.gov.uk 07384452156
 - If you are a member of staff and notice a concern about a learner, share with a Safeguarding Officer via the existing safeguarding procedures
 - If you are a member of staff and notice a concern about another member of staff, share with your Head of Department or Safeguarding Officer
 - If you are a member of staff and notice a concern about a person external to JGW Training t/a Ascento, share with your Head of Department or Counter terrorism hotline 0800 789 321

Responsibility for contacting PREVENT support

1. The following people are responsible for making the decision to contact the Police Prevent Team or the DfE Regional HE/FE Prevent Coordinator if serious concerns are raised about a learner, a member of staff or a person external to JGW Training t/a Ascento:
 - Safeguarding Officer (Quality Manager)
 - Members of the Board of Directors
2. No one person will usually make this decision. The Senior Management Team must make any decision for referral. This would be in the first instance through the HE/FE Prevent Lead Co-ordinator, through whom we have access to a national network of support. Advice would be sought and appropriate action would follow.
3. PREVENT is designed to make reporting easier and more straightforward. JGW Training t/a Ascento will do everything it can to ensure that support and guidance is available to staff, learners and employers. If you have any proposals for additional support or advice that you think may help, please share these with a Senior Manager.

Action taken to implement this Safeguarding & Prevent Policy

1. Training will be provided as appropriate to ensure that staff are aware of this policy and procedure. Specialist training will be provided for Child Protection Officers.
2. JGW Training Ltd (t/a Ascento) Child Protection Officer will also attend any relevant training Child protection or CAF training.

Monitoring and Review

3. The number of Child protection cases will be reviewed by the Lead Child protection Officer annually.
4. The policy will be reviewed annually by JGW Training Ltd (t/a Ascento).

THE PROCEDURE

1. Where a young person/vulnerable adult discloses abuse to a member of staff the member of staff must report the disclosure to one of the designated Child Protection Officers within 2 hours of hearing the allegation. The incident must be recorded.
2. The Lead Child Protection Officer is the Quality Manager.
3. The member of staff concerned should follow the guidelines attached when hearing the allegation. In particular; Do not ask leading questions, Do not promise to keep the allegation confidential and Do not attempt to investigate the incident but report it to one of JGW Training Ltd (t/a Ascento) Child Protection Officers.
4. This procedure exists not only to safeguard the young person/vulnerable adult, but also to protect members of staff against possible allegations.
5. *IT IS NOT THE RESPONSIBILITY OF ANY MEMBER OF STAFF TO INVESTIGATE SUSPECTED ABUSE. THIS IS STRICTLY A MATTER FOR SOCIAL SERVICES AND THE POLICE*

6. The Child Protection Officer will check that relevant information is recorded and make a decision about whether or not the incident should be reported to an external agency such as Social Services. In making this decision the Child Protection Officer may need to conduct an investigation, however undue delay in reporting an incident should be avoided. The action taken will be recorded. Any telephone conversation with an external agency such as Social Services will be formalised by sending a letter within 24 hours.

7. When a young person/vulnerable adult discloses abuse to a member of staff but is insistent that they do not want any further or immediate action - The disclosure should still be reported to one of the Child Protection Officers who will ensure completion of the relevant documentation. As a result of this the CPO may, in some circumstances and following an investigation, decide that action is required.

8. To safeguard and promote the welfare of young people:-

- All new staff will undergo a Disclosure Barring Services background check (DBS).
- All new staff will be made aware of the Child Protection and Vulnerable Person policy and procedure at induction.
- All staff that work with young people will undertake relevant training to enable them to carry out their responsibilities for vulnerable persons protection effectively. The training will be delivered under the guidance of JGW Training Ltd (t/a Ascento) nominee.
- All staff will complete annual safeguarding training and additional mandatory training as determined by the SMT. All evidence will be recorded on the CPD record of each member of staff.
- All staff and visitors must wear identity badges at all times if in areas accessed by students.
- Procedures are in place to deal with allegations of abuse by a person against a member of staff.
- All staff need to know that inappropriate behaviour towards young and vulnerable persons is unacceptable. In particular the Sexual Offence Act 2003 states that it is an offence for a person over the age of 18 (eg a teacher or support worker) to have a sexual relationship with a young person under the age of 18 where that person is in a position of trust and respect to that young person even if the relationship is consensual.

Common Inspection Framework

1. The CIF has been developed in response to the Children's Act 2004 out of the need to ensure that child support agencies and other organisations working with children/young people, including schools and colleges, share relevant information. CIF is about early intervention and preventative action.

2. A key feature of the CIF procedure is that the young person/vulnerable adult and their family/guardian are involved in the process along with other agencies as necessary.

Legislation

The Children Act 1989

The Education Act 2002

Sexual Offences Act 2003

The Children Act 2004

Code of Conduct for Staff working with Young Learners and Vulnerable Adults

Introduction

1. This code has been drawn up to assist staff in maintaining entirely proper and professional relationships with young learners and vulnerable adults.
2. It is stressed that this code is not a legal document but is intended to provide guidance to employees in carrying out their responsibilities.
3. Staff need to be prudent about their own conduct and vigilant about the conduct of others, so that their relationships with young learners and vulnerable adults remain and are seen to remain entirely proper and professional. It is recognised that staff are vulnerable to the possible consequences of their close professional relationships with young learners and to the potential for malicious and misplaced allegations being made by young learners or vulnerable adults, either deliberately or innocently, arising from the normal proper associations that staff may have with them.

Guidelines for all relevant staff

Physical contact

1. As a general principle, staff should not have unnecessary physical contact with their young learners or vulnerable adults. There may be very limited occasions when a learner needs comfort or reassurance, which may include physical comforting. Any such comforting gestures must always be acceptable to the young person concerned ie there should be no unwanted physical contact, however well intentioned. However, be aware that any physical contact may be misconstrued by a learner, parent/carer or observer. Such contact can include well-intentioned informal and formal gestures such as putting a hand on the shoulder or arm, which, if repeated with an individual young learner, could lead to serious questions being raised.
2. Some staff are likely to come into physical contact with young learners and vulnerable adults from time to time in the course of their training activities, for example when showing a young learner or vulnerable adult how to use a piece of apparatus or equipment. Staff should give a clear explanation of the intended activity and ask the young person or vulnerable adult if it is alright to proceed. Staff should be aware of the limits within which such contact should properly take place and should consider the possibility of such contact being misinterpreted by the young learner or vulnerable adult.
3. Any form of physical punishment of young learners or vulnerable adults is unlawful, as is any form of physical response to misbehaviour unless it is by way of restraint. It is particularly important that employees understand this both to protect their own position and that of the organisation and the educational establishment.
4. There may be occasions where it is necessary for a member of staff to physically restrain a young learner or vulnerable adult to prevent him/her from inflicting injury to himself/herself or others. In such cases only the minimum force necessary must be used and any action taken must be to restrain a young learner or vulnerable adult. Where the member of staff has taken action to restrain a young learner or vulnerable adult he/she should report the matter to their manager and should complete an incident report form.

Sexual Contact (in relation to young people under 18 and vulnerable adults)

5. There is NO acceptable behaviour that involves either explicit sexual acts or innuendos. Any such behaviour will always be treated as extremely serious and must be reported immediately.

Meetings with Young Learners

6. Staff should be aware of the potential risks which may arise from interviewing individual young learners and vulnerable adults in private. It is recognised that there will be occasions when confidential interviews must take place but, where possible, such interviews should be conducted in a room with visual access or with the door open, or in a room or area which is likely to be frequented by other people. Meetings with young learners and vulnerable adults away from educational or business premises normally utilised eg home or off-site visits should not take place unless specific approval has been obtained from those responsible for the learner (eg Line Manager).

7. Where such conditions cannot apply, staff are advised to ensure that another adult knows that the interview is taking place.

8. If it is necessary to detain a young learner or vulnerable adult for any length of time after the end of normal hours, prior warning must be given to the young learner's or vulnerable adult's parents/careers

Provision of Advice and Guidance

9. Staff may be approached by young learners or vulnerable adults for advice. Young learners or vulnerable adults may also appear distressed and staff may feel the need to ask if all is well. In such cases staff must judge whether it is appropriate for them to offer counselling and advice or whether to refer the young learner to a member of staff or another gender or to one with acknowledged expertise, experience or responsibility for that young learner or vulnerable adults eg a counsellor. Staff must, in these circumstances, use their discretion to ensure that any probing for details cannot be construed as unjustified intrusion.

10. Staff are advised never to stop a free-flowing account/disclosure of abuse but to make sure that at an appropriate point they inform the young person or vulnerable adult that they cannot keep such information confidential and need to tell someone else to get help. Example "Thank you for telling me, I now need to tell (where possible give the name and position of who will be told) so that we can get some help for you".

11. A young learner or vulnerable adult may ask a member of staff to "keep a secret", or to promise not to tell other people what they are about to tell them, where this happens the member of staff must explain that they are not able to promise confidentiality as they need to tell someone else if they are to help the young person.

12. Where a young person or vulnerable adult is told by a member of staff that they cannot promise confidentiality the young person may decide not to continue telling. If a young person starts to say something and then stops, the member of staff needs to try to leave it open for the young person to come back to the discussion; the member of staff must act, following the Child Protection Procedures and inform one of the Child Protection Officers.

General Relationships with Young Learners and Vulnerable Adults

13. Staff should ensure that their relationships with young learners and vulnerable adults are appropriate to the age and gender of the young learner or vulnerable adult, taking care that their conduct does not give rise to comment or speculation. Attitudes, demeanour and language all require care and thought, particularly when dealing with adolescents.

14. Comments by staff to young learners or vulnerable adults, either individually or collectively, can be misconstrued. As a general principle, staff must not make unnecessary comments to and/or about young learners and vulnerable adults which could be construed to have a sexual connotation. It is also unacceptable for staff to introduce or to encourage debate amongst young learners and vulnerable adults in a class, training situation or elsewhere, which could be construed as having a sexual connotation that is unnecessary given the context of the training session or the circumstances. However, it is recognised that a topic raised by a young learner or vulnerable adult is best addressed rather than ignored.

15. Staff should be careful in their use of language/terminology that may be misconstrued. The systematic use of insensitive, disparaging or sarcastic comments is unacceptable.

16. If staff, at any time, feel that their relationship with a young learner or vulnerable adult is developing into one that would be inappropriate between a member of staff and a young learner or vulnerable adult, it is their responsibility to discuss the situation with their line manager.

Dealing with disclosure of abuse

17. If a learner tells a member of staff about possible abuse:

- listen carefully, stay calm and do not pre-judge
- do not interview the learner, although if necessary you may seek to clarify, using open questions and without putting words into the young person's, in order to be sure that you understand what she/he is telling you, but keep questions to the minimum needed for clarity
- reassure the learner that by telling you, they have done the right thing
- Inform the learner that you must pass the information on, but that only those that need to know about it will be told. Tell them who you are going to report the matter to
- note the main points carefully, specifically: date and time of report; date, time and place of alleged abuse
- your name and name of complainant
- name of learner alleged to have been abused, if different from above
- nature of alleged abuse

18. Staff should record the young person's disclosure carefully and aim for a verbatim account if possible. It is important to report the disclosure as factually as possible. Opinion should be avoided or clearly presented as an opinion

- description of any injuries observed, if any
- any other information given, including siblings if relevant
- confirmation that the learner has been advised of the next steps

19. A member of staff may have concerns or suspicions of abuse without having received a disclosure from a learner. In these circumstances, the member of staff should record their concerns as factually as possible, reproducing verbatim any words used by any learners concerned, and avoid expressing opinions. Where opinions are unavoidable, they should be clearly presented as such

- Staff should not investigate concerns or allegations themselves, but should report them immediately to the Designated Person or Support Persons. They will then make a referral to the Derbyshire Safeguarding Adults Board
- If abuse is suspected but not disclosed, it may be appropriate to remind the student about the availability of an appropriate counselling service.

Dealing with a disclosure

20. If a child or young person tells a member of staff about possible abuse the following guidance should be followed:

- Listen carefully to what is being said without displaying shock. Do not interview the child or person concerned; listen only asking questions when necessary to clarify in order to be sure that you understand what they are telling you.
- Allow the person to speak freely ensuring you do not put words into the child or person's mouth.
- Reassure them that by telling you, they have done the right thing. Do not promise to keep what they tell you confidential.
- Explain to them that you may have to pass the information on to a member of the safeguarding team, but that only those that need to know about it will be told.
- Complete the Safeguarding recording sheet form. Add as much detail as possible using the learners' own words.
- Make a detailed note of the date, time, place, what the child or person said, give a full account of your conversation, including anything else that concerns you.
- Staff should not investigate concerns or allegations themselves but should report them immediately to the Designated Safeguarding Person.
- The Safeguarding reporting sheet form must be handed to one of the Designated Safeguarding Person in person, it must not be emailed or put in the post.
- When appropriate the Designated Safeguarding Person's will undertake any required discussions and communication with parents and carers

Whistle blowing

1. Whistle blowing is an important aspect of safeguarding. This is where staff and learners are encouraged to share genuine concerns about a colleague's behaviour in confidence, with the Designated Person

2. Working with vulnerable persons places staff and volunteers in positions of power. In order to retain the trust of vulnerable persons, it is essential that all reasonable steps are taken to ensure this power is exercised responsibly.

3. There may be situations whereby staff or volunteers have genuine concerns about the conduct of a colleague towards a participant. All at JGW TRAINING LTD have the right and the responsibility to raise concerns, without prejudice to their own position, about the behaviour of staff, managers, volunteers, or learners, which may be harmful to those in their care and will receive appropriate support when doing so.
4. In accordance with the Public Interest Disclosure Act 1988 and JGW TRAINING LTD Public Interest Disclosure Procedure (Whistle blowing), JGW TRAINING LTD will support and protect those staff and learners who, in good faith and without malicious intent, report suspicions of abuse or concerns about colleagues and their actions.
5. Whistle blowing should be part of transparent work practices and is not intended to set up mistrust or suspicion among staff and volunteers.
6. Staffs who want to get free confidential advice about whistle blowing can contact Public Concern at Work on 020 7404 6609 or visit their website at www.pcaew.org.uk.

Reporting of Incidents

1. Following any incident where a member of staff feels that his/her actions have been, or may be, misconstrued, the member of staff should report the matter to their manager.
2. Such reporting is especially important in any case where a member of staff has been obliged to restrain a young person or vulnerable adult physically to prevent him/her from inflicting injury to others or themselves, or where he/she has been personally attacked by another young learner, parent or carer.

Dealing with an allegation

1. It is imperative that those dealing with an allegation maintain an open mind and that investigation are thorough and not subject to delay.
2. Recognises that the welfare of the learner is the paramount concern. It also recognises that hasty or ill-informed decisions in connection with a member of staff can irreparably damage an individual's reputation, confidence and career.
3. Therefore, those dealing with such allegations within will do so with sensitivity and will act in a careful, measured way.

Receiving an allegation

1. A member of staff who receives an allegation about another member of staff should follow the previous guidelines for dealing with disclosure.
2. The allegation should be reported immediately to the Managing Director, unless the Managing Director is the person against whom the allegation is made, in which case the report should be made to the Designated Person

The Managing Director or Designated Person if the allegation is against the Managing Director should:

- Obtain written details of the allegation from the person who received it, that are signed and dated.
- The written details should be countersigned and dated by the Managing Director or Designated Person and record information about times, dates, locations and names of potential witnesses.

Initial Assessment by the Managing Director or Designated Person

1. The Managing Director or Designated Person should make an initial assessment of the allegation, consulting with the Derbyshire Safeguarding or Social Services as appropriate. Where the allegation is considered to be either a potential criminal act or indicates that the Learner has suffered, is suffering or is likely to suffer significant harm, the matter should be reported immediately to Derbyshire Safeguarding Unit.
2. It is important that the Managing Director or Designated Person does not investigate the allegation. The initial assessment should be based on the information received and is a decision whether or not the allegation warrants further investigation.
3. Other potential outcomes are:
 - The allegation represents inappropriate behaviour or poor practice by the member of staff and is potentially neither a crime nor a cause of significant harm to the learner. The matter should be addressed in accordance with Staff disciplinary procedure
 - The allegation can be shown to be false because the facts alleged could not possibly be true

Safer Recruitment

1. JGW Training Ltd has in place a separate Safer Recruitment Policy for the safe recruitment and selection of staff. This includes a formal policy and procedure on vetting job applicants through the Vetting and Barring Scheme. These policies and procedures shall be reviewed annually.

Staff Development

1. All staff undergo training in Safeguarding and Prevent. All new members of staff will complete, within 48 hours of their contracted start date:
 - Prevent Training – Home Office E-learning Programme
 - Prevent for Practitioners – Foundation Online Programme
 - Safeguarding Training
2. All staff undertaken annual Safeguarding and Prevent training that is certificated and also recorded in their CPD records.

Staff Commitment

1. In addition to the above policy staff commitment is further ensured through the following:
 - All tutors / teaching staff are required to ask questions at every learner review regarding Safeguarding and Prevent.
 - Each department is required to include Prevent and Safeguarding learning activities into the curriculum and in particular workshop session plans.
 - All internal meetings include Safeguarding and Prevent as agenda items. This includes meetings at Department, Senior Management and Board levels.
 - Internal CPD days and monthly Best practise sessions include activities related to Safeguarding & Prevent. Examples of best practise are shared during such sessions.

T Stevenson
Operations Director
Date : 1.3.23