Safeguarding Policy

2021/22

Contents

1.   Policy Statement

JTL is committed to the safeguarding of all and believes it is always unacceptable for anyone to experience abuse or discrimination of any kind; it takes all reasonable steps to protect all from harm and accepts its responsibility for the well-being and safety of its stakeholders including children and adults at risk.

JTL will make every effort to comply with current legislation, ensuring that the JTL Board of Trustees and Executive Management Team, and wider staff teams, understand and meet their safeguarding responsibilities.

All learners, including those who are defined as young people (children), vulnerable learners and/or adults at risk, have the right to protection, to be listened to and to have their opinions heard. JTL is committed to ensuring all learners on its scheme have the best opportunity to train and work in an informed and appropriate environment. JTL will support learners at all times and ensure that they are signposted to the most appropriate organisation for guidance, information and counselling services. The learner will be treated with dignity throughout this entire process.

JTL will ensure that the rights of learners are respected regardless of age, sex, sexual orientation, disability, race (including colour, nationality, ethnic origin), religion or beliefs, gender reassignment, pregnancy and maternity status, marital or civil partnership status.

As a Training Provider, JTL complies with its responsibility under the Counter Terrorism and Security Act (CTSA) 2015 to have due regard to the need to prevent people from being drawn into terrorism.

Date: 1 August 2021   Signed: *J C Graham*

Jon Graham, Chief Executive

2.   Purpose

This policy and associated procedures and guidance is for all JTL Staff, delivery partners, learners and employers. It outlines everybody's responsibilities in relation to safeguarding, relevant laws and associated policies that we must abide by, and/as well as the processes/procedures to be followed should a safeguarding concern be identified. This policy includes a number of appendices that outline important information all JTL staff should be aware of.

3.   Scope

All JTL staff will abide by current UK safeguarding legislation and follow procedures as set out in this Policy. This includes JTL Board of Trustees and Executive Management Team, as well as all staff, volunteers, workers supplied by agencies, contractors, other support workers, visitors and any other partner organisations or procured bodies supporting JTL learners. It applies to all processes relating to employment, education and training and interactions with staff, learners, employers and partners.

4. Associated Policies

This policy should be read in conjunction with the policies referred to in the main body of this policy, or referenced in **Appendix A**.

5. Legislation and Guidance

It is a statutory requirement that all staff read and understand Part 1 and Annex A of the current Keeping Children Safe in Education guidance (available to all staff via Select HR), and managers should ensure that their teams have complied with this. Further legislation relevant to this policy is referenced in **Appendix B**.

6. Roles and Responsibilities

JTL will make every effort to comply with current legislation, ensuring that JTL Board of Trustees and Executive Management Team and wider staff teams understand and meet their safeguarding responsibilities.

6.1 Accountability

The Designated Safeguarding Lead (DSL) has lead responsibility for safeguarding and child protection within the organisation. This role is held by the HR Director. On a day to day operational basis, the HR Director is supported by two Diversity, Safeguarding and Inclusion (DSI) Advisors as named deputy safeguarding leads. JTL Heads of Learner Assessment (HOLA) and their Learner Assessment Managers (LAM) act as Regional Designated Safeguarding (DSO) Officers across the regions, supporting their staff teams to ensure that safeguarding and welfare concerns are routed to the DSI team.

6.2 Staff Responsibilities

It is the responsibility of each and every one (as summarised in section 2.0 of this policy) to make sure that any concerns, no matter how minor, regarding abuse or harm are reported to JTL's DSI Advisors in accordance with the process set out in this policy. It is a statutory requirement that all staff read and understand the current Keeping Children Safe in Education guidance. All Managers should ensure that their teams comply with this.

6.3 Staff Training

Completion of mandatory safeguarding training is a condition of employment and all staff are required to undertake training on a regular basis. Staff members who have additional responsibilities (e.g. DSL, DSI Advisors, and Regional DSOs) will complete additional specialist training. Board members receive annual training.

7. JTL Staff Recruitment and Selection

JTL will only recruit staff who have the required skills and experience and who have satisfactorily passed all recruitment vetting checks. These checks include, but are not limited to, identity, academic qualifications, professional references and previous

employment history. An Enhanced Disclosure and Barring Service (DBS) check and necessary approvals will be required for all staff who engage in regulated activity.

8. What is Safeguarding?

Safeguarding is a term used to denote measures to protect the health, well-being, and human rights of individuals, which allow people — children, young people, and adults — to live free from abuse, harm, and neglect.

Child Protection is part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

All staff need to be aware that safeguarding incidents can occur in situations both inside and outside of their families. Young people can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines and **ALL** concerns, regardless of when or where they have occurred, should be reported to the DSI Team.

9. Online Safety

As a training provider JTL acknowledges that online safety is one of the integral components to keeping staff and learners safe. JTL provides safe access to the internet and digital technology to all staff and provides guidance for the management of remote learning delivery.

Access to the internet or email on computers within JTL premises will be monitored. Internet filtering systems are in place to monitor and safeguard all from accessing inappropriate sites; this is regularly reviewed and monitored by the Technology team to ensure the filters have not been compromised. Learner accessible machines have filtering and monitoring software that flags any concerning inputs to IT, DSI Team and relevant staff.

Downloading and forwarding unauthorised copyright information or materials that may be considered defamatory, racist, sexist, homophobic, incites hatred or violence, is sexually explicit or otherwise contravenes JTL's Equality and Diversity (JTL701) and Bullying and Harassment (JTL727) or other key organisational policies will be treated as gross misconduct. Emails received and/or passed on that contain jokes of a sexual or racial nature or jokes that cause offence and can be considered as harassment should be reported. See the **Online Safety Policy (JTL782)** for further information.

10. Radicalisation/Prevent – Counter Terrorism

As a Training Provider, JTL complies with its responsibility under the Counter Terrorism and Security Act (CTSA) 2015 to have due regard to the need to prevent people from

being drawn into terrorism. This is often referred to as the Prevent Duty. JTL has a Prevent Action Plan that is reviewed regularly and the **Prevent Policy (JTL781)** should be referred to for further specific guidance.

The Prevent Duty is a government strategy that was introduced to safeguard communities against the threat of extremism, radicalisation and terrorism, and for the promotion of British values.

All JTL staff and learners are provided with information and training on Prevent and British values that must be completed as part of safeguarding training which includes information on who to talk to if they are concerned that someone may be vulnerable to being radicalised.

JTL is vigilant to concerns about the presence of radicalisation and/or extremism and is committed to addressing such issues appropriately in partnership with communities and other organisations and Department of Education (DfE) Regional Prevent Coordinators. All concerns should be reported in the first instance using the procedures outlined in section 10 of this policy. Where it is deemed appropriate, JTL will refer the individual to the Channel Programme for assessment and support.

11. Reporting and Recording Procedures

All staff must ensure that they are familiar with and understand the '5 R' principles that underpin the reporting and referral process referenced in **Appendix C**. These are:

- **Recognise** the signs of abuse

- **Respond** and react accordingly

- **Record** the facts of the disclosure

- **Report** the disclosure as soon as possible/within 24 hours

- **Refer** all relevant concerns to external agencies as appropriate.

JTL's DSI Advisors will refer all relevant concerns to external agencies as appropriate.

In situations where an individual may be at risk of immediate harm, it may be necessary for a staff member to inform the emergency services. In these cases, it is vital that staff ensure the information is reported to the DSI Advisor as soon as is practical, but always on the same day with an electronic report submitted within 24 hours.

All staff must be aware that they cannot promise confidentiality if this could compromise the safety or well-being of a learner or that of another.

It is vital that throughout the process, the views of the learner are taken into account and they are never made to feel that they are creating a problem.

11.1 When to Make a Report

All JTL staff have a duty to report any concerns they may have that a learner may be at risk of harm or abuse, even if the learner has asked for the incident to be kept confidential between themselves and the member of staff.

Staff are required to report:

- if abuse or harm is suspected
- if abuse or harm is witnessed
- when an allegation of abuse or harm is made
- when a learner discloses abuse or harm
- where they have any other concern for learner well-being.

Appendix D provides a summary and definitions of types of abuse and wider safeguarding concerns.

11.2 The Reporting Procedure

JTL has a confidential internal process for the reporting and recording of concerns. It is important to note that, when any suspicions or allegations of harm or abuse have been reported, information is kept confidential and only shared on a 'need know' basis.

Where any information obtained needs to be shared with outside agencies to ensure the safety and welfare of an individual, this will be undertaken following safeguarding information sharing guidelines detailed in **Appendix E**.

All records are stored securely in accordance with GDPR requirements.

Key reporting process steps are detailed in sections 11.3 and 11.4 and **Appendix F**.

All staff should be aware of indicators of abuse and neglect. Neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

If a staff member is unsure about a concern, they should always speak with a DSI Advisor. **Appendix D** provides further information on potential indicators of abuse and neglect.

11.3. Reporting Concerns Relating to a Learner

All concerns should be recorded using JTL's internal electronic incident reporting facility within 24 hours. If the person reporting does not have access to our electronic system then an email should be sent to the DSI team via **safeguarding@jtltraining.com** or **01689 884120**.

- JTL's DSI Advisor will notify (if appropriate) the relevant Learner Assessment Manager or Head of Learner Assessment of the incident.

- Individuals who report the allegation, or make the disclosure, are required to keep the matter confidential and only discuss it with JTL's DSI Advisors and/or specifically designated personnel.

- If the allegation is reported by a delivery partner (college), the person receiving the report must liaise with JTL's DSI Advisors and any other relevant parties.

- Staff based at JTL Training Centres must inform the DSI Advisors of any incidents immediately. The matter must be kept confidential to the designated people dealing with the incident.

JTL's DSI Advisors will keep all relevant parties informed of the outcome if/as appropriate.

11.4. **Managing Allegations Against Staff**

Occasionally JTL will receive complaints or allegations against a member of staff. It is important that a fair and balanced approach is taken to ensure that both the complainant and the staff member are safeguarded. Detailed procedures are contained in **Disciplinary and Grievance Policy and Procedures (JTL1007) – Managing Allegations Against Staff**.

In situations where such an allegation is made, the individual receiving the information must:

- take the issue seriously and note the facts of the allegation

- inform the DSI Advisor and HR Director on the day that the allegation is made.

It is important that the allegation raised is not discussed further, nor action taken, by the reporting person until directed by the DSI Advisor or HR Director.

All staff should take care not to place themselves in a vulnerable position with learners and act in line with JTL's Code of Conduct.

12. Additional Learning Support

JTL aims to support all learners' learning needs and styles to help them in achieving their apprenticeship. Where JTL is aware of an additional learning need or disability, relevant information will be shared with JTL's Additional Learning Support team and the DSI Advisors as appropriate.

13. Medical/Vulnerability Learner Risk Assessment

A **Medical/Vulnerability Risk Assessment (JTL 882)** will be undertaken as necessary for learners who are identified as vulnerable. The risk assessment is to ensure that appropriate provision is in place to meet the individual learner's needs. Where such a risk assessment forms part of a broader support plan for a learner it will only be shared with relevant parties on a 'need to know' basis.

14. Photography, Filming and Image Recording

All learners are required to consent to photography and filming at the start of their apprenticeship/traineeship for use in:

- JTL's internal record system
- JIB Registration
- the apprentice's CSCS ID card
- for gathering site assessment evidence for the apprentice's NVQ portfolios
- marketing purposes (**see section 15**).

14.1 CCTV and E-Reception Systems

JTL uses closed-circuit television (CCTV) in JTL Training Centres both internally and externally. These systems comprise fixed cameras located around each centre, including classrooms. All cameras are monitored from a central site in each centre, which is only available to designated staff.

The CCTV system is registered with the Information Commissioner in compliance with the Data Protection Act 2018 and the Commissioner's code of practice.

Materials and images captured on CCTV will not be used for any marketing purposes or released to the media. Images will only be used for legitimate purposes such as the investigation of a specific incident. Footage will only be released to support any external investigations of this nature upon receipt of a written request from the authorities such as the police.

All staff, learners and visitors to JTL centres are expected to sign in and out using attendance systems that include the capture of a photographic image for identification purposes.

15. Publicity and Marketing

Images or films of learners captured will be used from time to time for marketing purposes. Any images captured will be stored securely and held by the marketing department. This also includes any young person/child visiting JTL, either independently or as part of school activity.

Photos of JTL events will be published on JTL social network platforms, as well as on its website.

All photographs are taken in accordance with the legislative guidelines and with due regard to the Data Protection Act (2018) and GDPR guidance, and are carefully selected so as not to cause offence or distress to children, young people or parents.

16.   Campaigns and Events and External Speakers

Where campaigns/events involving any external organisations (such as schools, training providers and/or young people) take place on JTL premises, the JTL organiser will need to liaise with relevant managers to ensure safety and safeguarding measures are in place prior to the campaign/event and JTL's External Speakers procedures (as outlined in the **Training Centre Staff Policy and Procedures Handbook [JTL6002]**) must be fully complied with at all times.

JTL will require an external organisation to put in writing that it gives permission for its students/learners to be photographed at events. It is the responsibility of the event organiser to ensure that consent is given and evidenced.

17.   Visitors to JTL Centres

All staff, learners and visitors to JTL centres are required to comply with JTL sign-in and sign-out procedures. This includes all visitors being issued with and ensuring that designated coloured lanyards and visitor's badges are clearly worn at all times. Any person not visibly wearing the relevant staff, learner or visitor identification will be asked to produce this. All visitors must be accompanied by a member of JTL staff. Further detail is included in the **Training Centre Staff Policy and Procedures Handbook (JTL6002)**.

18.   Field Trips

All field trips should be approved by the relevant JTL Director, and the Health and Safety Guidance for Learner Off-site Visits should be followed, and the relevant risk assessments and consent forms completed.

19.   PPV (Pre-Placement Vetting)

Prior to commencing on a JTL scheme, the employer's arrangement for Health, Safety and Welfare (HSW) for learners will be assessed. Employers will be required to demonstrate that they have adequate procedures in place. (This includes ensuring that suitable safeguards and risk assessment have been completed prior to any traineeship work placements or work experience organised with JTL.)

A record of the pre-placement vetting is continually monitored, updated and reviewed every three years.

20.   Working Away from Home

On occasion, learners may be asked by their employers to work away from home for a period of time. In accordance with JTL's Pre-Placement Vetting (PPV) procedures, employers are asked to verify that they have adequate procedures in place to ensure the safety of learners.

21. Data Protection and GDPR (General Data Protection Regulations)

JTL stores and processes information in compliance with the Data Protection Act (2018), and in accordance with the General Data Protection Regulation. Any information shared in relation to a safeguarding concern is processed in accordance with relevant requirements on information disclosures.

22. Complaints

We have the following procedures in place to deal with complaints:

- Learners and employers can raise complaint formally through the **Complaints Procedure (JTL7006)**.

- Staff can raise complaints formally through the **Discipline and Grievance Procedure (JTL1007)**.

- Partners and service users should send their complaint to the relevant JTL department or to our Head of Quality and Audit, who will follow the **Complaint Procedure (JTL7006)**.

JTL will investigate all complaints thoroughly and deal with them appropriately.

23. Useful Contacts

Diane Thompson (07341 003938)   Diversity, Safeguarding and Inclusion Advisor

Rachel Jagger-Thomas (07825 607293)   Diversity, Safeguarding and Inclusion Advisor

Julie Asher-Smith (01680 884105)   HR Director (Designated Safeguarding Lead)

Steve Holden (07407 140915)   HR Manager

Steve Smith (01689 884150)   Head of Health and Safety

David Consterdine (07887 642799)   Head of Quality Assurance and Audit

In the absence of the DSI Advisors, please refer any safeguarding concerns to the HR Director who is the JTL Designated Safeguarding Lead.

Appendix A: Linked Policies and Procedures

- JTL738   Additional Learning Support Policy

- JTL727   Bullying and Harassment (JTL1005 – Staff)

- JTL7006   Customer Complaints

- JTL1007   Disciplinary and Grievance Policy and Procedures

- JTL1000   Employee Handbook

- JTL701   Equality and Diversity Policy and Procedures (JTL0902 – Staff)

- JTL782   Online Safety Policy

- JTL803   Health and Safety Policy (JTL 0901 – Staff)

- JTL781   Prevent Policy

- JTL6002   Training Centre Staff Policy and Procedures Handbook

Appendix B: Legislation and Guidance

This appendix outlines the key legislation and guidance that JTL refers to meet its responsibilities in relation to safeguarding.

- The Children Act 1989

- The Children Act 2004

- Working Together to Safeguard Children 2018

- Keeping Children Safe in Education 2021

- Protection of Freedoms Act 2012

- Care Act 2014

- Children and Social Work Act 2017

- Keeping Learners Safe 2021 (Wales)

- Social Services and Well-Being (Wales) Act 2014

- Wales Safeguarding Procedures 2019

- Prevent Duty Guidance 2021

- Modern Slavery Act 2015

- Education Act 2002

- Education and Training (Welfare of Children) Act 2021

- Data Protection Act 2018

- General Data Protection Regulations (GDPR)

- Information Sharing – Advice for practitioners providing safeguarding services to children, young people, parents and carers 2018

- Guidance for safer working practice for those working with children and young people in education settings 2019

- Sexual violence ans sexual harassment between children in schools and colleges 2021

- Sharing nudes and semi-nudes: advice for education settings 2020

Appendix C: The '5 R' Process – Detailed Guidance

The following '5 R' process MUST be followed by **ALL** staff:

Recognise the signs of abuse.

Respond and react accordingly.

Record the facts of the disclosure.

Report the disclosure as soon as possible/within 24 hours.

Refer the DSI Advisor will refer all relevant concerns to external agencies as appropriate.

Recognise

Signs of abuse can be recognised as a contrast to the individual's usual behaviour or observed from a change in their physical appearance as mentioned below:

- Physical – this could include lack of personal hygiene, self-harm, substance or drug abuse, noticeable signs of bruising or flinching when being touched, developed a speech disorder or learning difficulty that cannot be attributed to a physical or psychological cause.

- Behavioural – this could include sudden changes in a person's character, lack of confidence, low self-esteem, withdrawn or being aggressive or angry for no reason, becoming anxious or tearful.

The information above is by no means exhaustive, and an individual may not wish to disclose something that they perceive as 'normal'.

Respond

People are often reluctant to talk about abuse. Many perpetrators may tell people to keep the abuse a secret and frighten them with unpleasant consequences.

Listed below are some ways as to respond to issues or concerns:

- Stay calm and listen carefully to what is being said.

- Do not promise to keep confidential any information that's been shared. Find an appropriate early opportunity to explain that it is likely the information will need to be shared with others, but that this will be on a 'need to know' basis.

- Reassure the person that they have done the right thing by telling you, but do not tell them that everything will be okay; sometimes things get worse before they get better.

- Allow the person to continue at his/her own pace – asking questions for clarification only; try to ask: "Tell me. Explain to me. Describe to me" to avoid leading for a particular answer.

- Tell them what you will do next, and with whom the information will be shared.

- Do not delay in discussing your concerns and if necessary, passing this information on.

If you feel that is anyone is at immediate risk, please take any reasonable steps within your role to protect any person from immediate harm, for example:

- Separate the alleged perpetrator and victim – but only if it is safe to do so.

- Call an ambulance or a GP if someone needs medical attention.

- Call the emergency services/police if a crime is taking place or has taken place.

Inform the DSI Advisor as soon as possible on the same day/and complete a report within 24 hours.

Any violence by a learner or member of staff **MUST** be reported to the DSI Advisors and through the JTL H&S/HR Process.

If you are suspicious but no disclosure has taken place, discuss your concerns with the designated safeguarding lead for your centre, or the DSI Advisor.

If a person approaches you to make allegations of inappropriate behaviour or misconduct against a member of staff:

- Contact the DSI Advisor/ HR Director.

- Follow the guidelines for **Disciplinary and Grievance Policy and Procedures (JTL1007) – Managing Allegations Against Staff** .

- Do not question the person making the allegation or investigate the matter yourself.

Record

All JTL learner safeguarding reports must be submitted via JTL recognised secure systems, where access is both restricted and password protected. Where access to the learner record is not readily available, please ensure that the following information is noted and forward to the DSI Advisor:

- Your details

- Name of those involved

- Date of incident(s)/disclosure/suspicion

- Details of incident(s)/disclosure/suspicion

- Background information

- Actions taken.

Incidents/concerns must then be recorded using JTL recognised secure systems at the next available opportunity.

Whilst you can record observations, do not interpret or give opinion as this may bias the information provided and jeopardise any future investigation into the allegation.

Report

Any issues or concerns, allegations or suspicions relating to safeguarding must be taken seriously and reported to a DSI Advisor immediately. All learner concerns must be recorded via JTL recognised secure systems. Concerns about staff members should be reported directly to DSI Advisors or HR Director.

- If the DSI Advisors are not available, speak with your local Designated Safeguarding Officer and/or the HR Director.

- The DSI will notify (if appropriate) the relevant Learner Assessment Manager or Head of Learner Assessment of the incident.

- If the allegation/concern is reported by a subcontracted partner (college), the person receiving the report must log the incident on JTL recognised secure systems in line with JTL protocol.

- If the allegation/concern is reported by an employer, the person receiving the report must log the incident on JTL recognised secure systems in line with JTL protocol.

All staff are reminded that information should only be shared on a 'need to know' basis and they are required to keep all safeguarding information confidential. It should only be discuss with JTL safeguarding staff.

Refer

The DSI Advisor will refer all relevant concerns to external agencies as appropriate. In situations where an individual may be at risk of immediate harm, it may be necessary for a staff member to inform the emergency services or Social Services or a referral via the Channel process. In these cases, it is vital they ensure that the information is reported to the DSI Advisor as soon as is practical, but always on the same day and an electronic report submitted within 24 hours.

The DSI Advisor will refer or support you with guidance on next steps and/or signposting to the relevant external agency.

Concerns about a young person subject to a Child Protection Order should be relayed to the DSI Advisor immediately. The DSI Advisor will then inform the learner's keyworker.

It is vital that throughout the process, the views of the learner are taken into account and they are never made to feel that they are creating a problem.

Learners Aged 18 Years or Over

All disclosures to JTL staff should be recorded using JTL recognised secure systems. There is no need to report past abuse to any outside agency unless there is a risk to others aged under 18 years, or it concerns an adult at risk, in which case the relevant safeguarding procedures should be followed.

The learner may wish to involve the police. The role of JTL is to support them through this process. Alternatively, the abuse may be in the past and learners may require being directed towards a counselling agency, such as NSPCC, Victim Support, SupportLine or other abuse survivor support agencies.

Appendix D: Definitions – Abuse and Wider Safeguarding Concerns

All staff should be aware of indicators of abuse and neglect. Neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another. If a staff member is unsure about a concern, they should always speak with a Diversity, Safeguarding and Inclusion (DSI) Advisor.

Any child/young person may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs

- has special educational needs (whether or not they have a statutory Education, Health and Care Plan)

- has a mental health need

- is a young carer

- is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines

- is frequently missing/goes missing from care or home

- is at risk of modern slavery, trafficking, sexual or criminal exploitation

- is at risk of being radicalised or exploited

- has a family member in prison or is affected by parental offending

- is in a family circumstance presenting challenges for the child/young person, such as drug and alcohol misuse, adult mental health issues and domestic abuse

- is misusing drugs or alcohol themselves

- has returned home to their family from care

- is at risk of honour-based abuse such as Female Genital Mutilation or forced marriage

- is a privately fostered child

- is persistently absent from education.

All staff should be aware of indicators or abuse and neglect, and specific safeguarding issues such as exploitation, so that they are able to identify cases of learners who may be in need of help or protection.

It is important to remember that technology is a significant component in many safeguarding and well-being issues. Learners are at risk of abuse online as well as in day to day life.

Child / Young Person

In England and Wales, a child is a person under the age of 18 years. A young person is generally thought as of one over the age of 13 years, but under the age of 18 years.

Adult at Risk

Is a person who is aged 18 years or over and at risk of abuse or neglect because of their need for care and support.

Abuse

A form of maltreatment: generally, physically, sexually, or mentally injuring a person. Somebody may abuse or neglect a child/young person or adult at risk by inflicting harm or failing to act to prevent harm. Abuse may take place in a family or in an institutional or community setting, by those known to them, or more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Abuse can be by an adult or adults, or by a child or children.

Physical Abuse

May involve hitting, shaking, throwing, poisoning, burning or scalding, drowning or suffocating, or otherwise causing physical harm to a child or adult at risk. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness, in a child

Emotional Abuse

Children
The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless; or unloved; or inadequate; or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say and how they communicate.

It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.

It may involve seeing or hearing the ill treatment of others. It may involve serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger; or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Adult at Risk
Psychological abuse – including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or unreasonable and unjustified withdrawal of services or supportive networks.

Sexual Abuse

Children
Forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside the clothing. They may include non- contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by children is a specific safeguarding issue in education (see peer-on-peer abuse on page 23).

Adult at Risk
Sexual abuse is the direct or indirect involvement of the adult at risk in sexual activity or relationships, which they:

● do not want or have not consented to

● cannot understand and lack the mental capacity to be able to give consent to

● have been coerced into because the other person is in a position of trust, power or authority (for example, a care worker).

Neglect

Children
The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of the child's health and development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

● provide adequate food, clothing and shelter, including exclusion from home or abandonment

● protect a child from physical and emotional harm or danger

- ensure adequate supervision (including the use of inadequate caregivers) or ensure access to appropriate medical care or treatment.

It may also include the neglect of, or unresponsiveness to, a child's basic emotional needs.

Adult at Risk

Neglect and acts of omission – including ignoring medical or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.

Mental Health

All staff should also be aware that 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.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however are well placed to identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

If staff have a mental health concern about a learner, this should be reported to the DSI team using the JTL safeguarding reporting process.

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enables' (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). See Online Safety Policy for more information.

Serious Violence

All staff should be aware of indicators which may signal that someone is at risk from, or involved with, serious violent crime. These may include increased absences, a change in friendship groups, significant decline in performance, signs of self-harm or significant change in well-being, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could indicate involvement with individuals associated with criminal networks or gangs.

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse that occur where an individual or group take advantage of an imbalance in power to coerce, manipulate or deceive a child/young person into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through

violence or the threat of violence. CSE and CCE can affect both males and females and can include those who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Different forms of harm often overlap, and perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

Exploitation can be by adult males or females, as individual or in groups. Exploitation may also be by children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

While age may be a contributing factor for an imbalance of power, there are a range of other factors that could make someone more vulnerable to exploitation, including gender, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of both criminal and sexual exploitation:

● Appear with unexplained gifts, money, or new possessions.

● Associate with others involved in exploitation.

● Suffer from changes in emotional well-being.

● Misuse drugs and alcohol.

● Go missing for periods of time or regularly come home late, and

● Regularly miss college or do not take part in education.

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing. They can also be forced into or manipulated into committing vehicle crime or threatening/committing serious violence to others.

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Some additional specific indicators that may be present in CSE are children who:

● have older boyfriends or girlfriends, and

● suffer from sexually transmitted infections, display sexual behaviour beyond expected sexual development or become pregnant.

County Lines

A term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of 'deal line'. This activity can happen locally as well as across the UK– no specified distance of travel is required. Children and vulnerable adults are exploited to move, store, and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Learners can be targeted and recruited into county lines in a number of locations, including education establishments and social settings, with social media being increasingly used to target and recruit victims.

Cuckooing

Cuckooing is a practice where people take over a person's home and use the property to facilitate exploitation.

There are different types of cuckooing:

- Using the property to grow, deal, store or take drugs

- Using the property to sex work

- Using the property to store weapons

- Taking over the property as a place for them to live

- Taking over the property to financially abuse the tenant.

The most common form of cuckooing is where drug dealers or gang members take over a person's home and use it to store or distribute drugs. They may begin by befriending the adult at risk. They will then offer the adult at risk something of interest to them, this could be a relationship, friendship, drugs and / or alcohol, money, or clothing. In exchange they may ask to 'borrow' a room, to store something or meet other 'friends' at the property. In some cases, the gang may make it clear that this is for criminal purposes, i.e. drug supply, or they may use an excuse as to why they want to use the property.

Gradually the 'benefits' will reduce and may eventually come to an end, and more and more people will come and go from the address. The gang members / drug dealers may threaten the adult at risk verbally or physically if they try to put a stop to their criminal activity. They will also discourage family / friends and support workers from visiting the vulnerable adult's address.

Bullying

All incidents of bullying, including cyber-bullying, racist, homophobic and gender related bullying are taken seriously, and will be dealt with in accordance with the **Bullying and Harassment Policy (JTL727)**.

Peer-on-Peer Abuse

All staff should be aware that children can abuse other children (often referred to as peer-on-peer abuse). All staff should be clear that any concerns need to be raised to the DSI team immediately, using JTL's electronic reporting process.

Peer-on-peer abuse is most likely to include, but may not be limited to:

- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)

- abuse in intimate personal relationships between peers

- bullying (including cyber-bullying)

- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)

- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse

- consensual and non-consensual sharing of nudes and semi-nudes images (also known as sexting)

- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

- upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence.

Sexual Violence and Sexual Harassment Between Children

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. JTL will not tolerate sexual violence or sexual harassment towards anyone within JTL.

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. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with additional learning needs and LGBT children are at greater risk.

Staff should be aware of the importance of:

● making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up

● not tolerating or dismissing sexual violence or sexual harassment as 'banter', 'part of growing up', 'just having a laugh' or 'boys being boys'
.
● challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

What is Sexual Violence and Sexual Harassment?

Sexual Violence
It is important that JTL staff are aware of sexual violence and the fact learners can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

● Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

● Assault by Penetration: A person (A) commits an offence if: they intentionally penetrate the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

● Sexual Assault: A person (A) commits an offence of sexual assault if: they intentionally touch another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

What is Consent?

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if they agree by choice to that penetration and have the freedom and capacity to make that choice.

Sexual Harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. Sexual harassment is likely to: violate a person's dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

● Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance, and calling someone sexualised names.

● Sexual 'jokes' or taunting

● physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature

● online sexual harassment. This may be stand-alone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:

  ● non-consensual sharing of sexual images and videos

  ● sexualised online bullying

  ● unwanted sexual comments and messages including, on social media

  ● sexual exploitation; coercion and threats

  ● upskirting.

The Response to a Report of Sexual Violence or Sexual Harassment

The initial response to a report from a learner is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. If staff have a concern about a learner, or a learner makes a report to them, they should follow the JTL reporting process so that a DSI Advisor can follow the appropriate referral process. As is always the case, if staff are in any doubt as to what to do, they should speak to the DSI Advisors or HR Director.

Radicalisation and Extremism

The Counter Terrorism and Security Act places a duty on specified authorities, including local authorities and childcare, education and other children's services providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism ('the Prevent duty').

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Terrorism is 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.

As with other safeguarding risks, staff should be alert to changes in behaviour that could indicate a learner may be in need of protection and reports to the DSI team should be made if a concern is identified. This may result in the DSI team making a Prevent referral.

Indicators of vulnerability to radicalisation include:

● Identity Crisis – the learner is distanced from their cultural/religious heritage and experiences discomfort about their place in society

● Personal Crisis – the learner may be experiencing family tensions; a sense of isolation; low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging

● Personal Circumstances – migration, local community tensions and events affecting the learner/'s country or region of origin may contribute to a sense of grievance triggered by personal experience of racism or discrimination or aspects of government policy

● Unmet Aspirations – the learner may have perceptions of injustice; a feeling of failure; or rejection of civic life

● Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement/reintegration

● Special Educational Need – learners may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism. (See also the **Prevent Policy [JTL781]**).

Additional Learning Needs and Disabilities

Learners with additional learning needs (ALN) and disabilities can face additional safeguarding challenges. JTL acknowledges additional barriers can exist when recognising abuse and neglect in this group of people.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the learner's disability without further exploration

- the potential for children/young people/learners with ALN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs

- communication barriers and difficulties in overcoming these barriers.

JTL has an Additional Learning Support (ALS) team to support learners who require additional learning support.

Domestic Abuse

Includes any incident or a pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse, between those aged 16 or over who are, or have been, an intimate partner or family member regardless of gender or sexuality. The abuse can encompass, but is not limited to psychological, physical, sexual, financial and emotional.

Domestic abuse can take different forms, including:

- physical abuse

- sexual abuse

- financial abuse

- coercive control and gaslighting / emotional abuse

- digital / online abuse

- so-called 'honour-based' violence

- forced marriage

- female genital mutilation (FGM).

Young people can also experience domestic abuse within their own intimate personal relationships.

Being exposed to domestic abuse has serious consequences for children and young people and can affect how they feel, think, and behave in harmful ways.

So-called 'Honour-Based' Abuse

So-called 'Honour-based' abuse (HBA) encompasses incidents or 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. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators.

Female Genital Mutilation (FGM)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

If an employee, in the course of their work, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, this must be reported to the DSI Advisor immediately and this will be escalated to the police by the DSI team.

Care and sensitivity should be shown to adults at risk who have been subject to FGM and further support should be sought where required. As this differs from region to region, if in doubt you should contact JTL's DSI Advisor.

Forced Marriage

A clear distinction must be made between a forced marriage and an arranged marriage. In arranged marriages, the families of both spouses take a leading role in choosing the marriage partner but the choice whether or not to accept the arrangement remains with the people who are marrying.

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

Modern Slavery

Encompasses slavery, human trafficking, and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Discriminatory Abuse

Including forms of harassment, bullying, slurs, isolation, neglect, denial of access to services or similar treatment because of race, gender and gender identity, age, disability, religion or because someone is lesbian, gay, bisexual or transgender. This includes racism, sexism, ageism, homophobia or any other form of hate incident or crime.

Homelessness

Being homeless or being at risk of becoming homeless present a real risk to a child's welfare. In most cases, homelessness may be considered in the context of children who live with their families; however, it should also be recognised that, in some cases, 16- and 17-year-olds could be living independently from their parents or guardian (for example through their exclusion from the family home) and they will require support. Children's services will be the lead agency for these young people and the DSI team will ensure appropriate referrals are made based on the child's circumstances.

All concerns around learner homelessness, regardless of the age of the learner, should be reported to the DSI team. JTL DSI Advisors work closely with the Electrical Industries Charity (EIC) and other support agencies to signpost learners to appropriate help and advice.

Financial or Material Abuse

Including theft, fraud, internet scamming, exploitation, 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 misappropriation of property, possessions or benefits.

Organisational (sometimes referred to as institutional)

Including 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 a person's own home. This may range from one off incidents to on-going ill treatment. It can be through neglect or poor professional practice because of the structure, policies, processes and practices within an organisation.

Mate Crime

This is when vulnerable people are befriended by members of the community who go on to exploit and take advantage of them. It may not be an illegal act, but it still has a negative effect on the individual. A mate crime is carried out by someone the person knows, and often takes places in private.

All staff should be aware that abuse, neglect, and safeguarding issues are rarely standalone events and cannot be covered by one definition or lone label alone. In most cases, multiple issues will overlap with one another, therefore staff should always be vigilant and always raise any concerns with the DSI Team.

Staff should maintain an attitude of 'It could happen here' and should always act in the best interest of our learners.
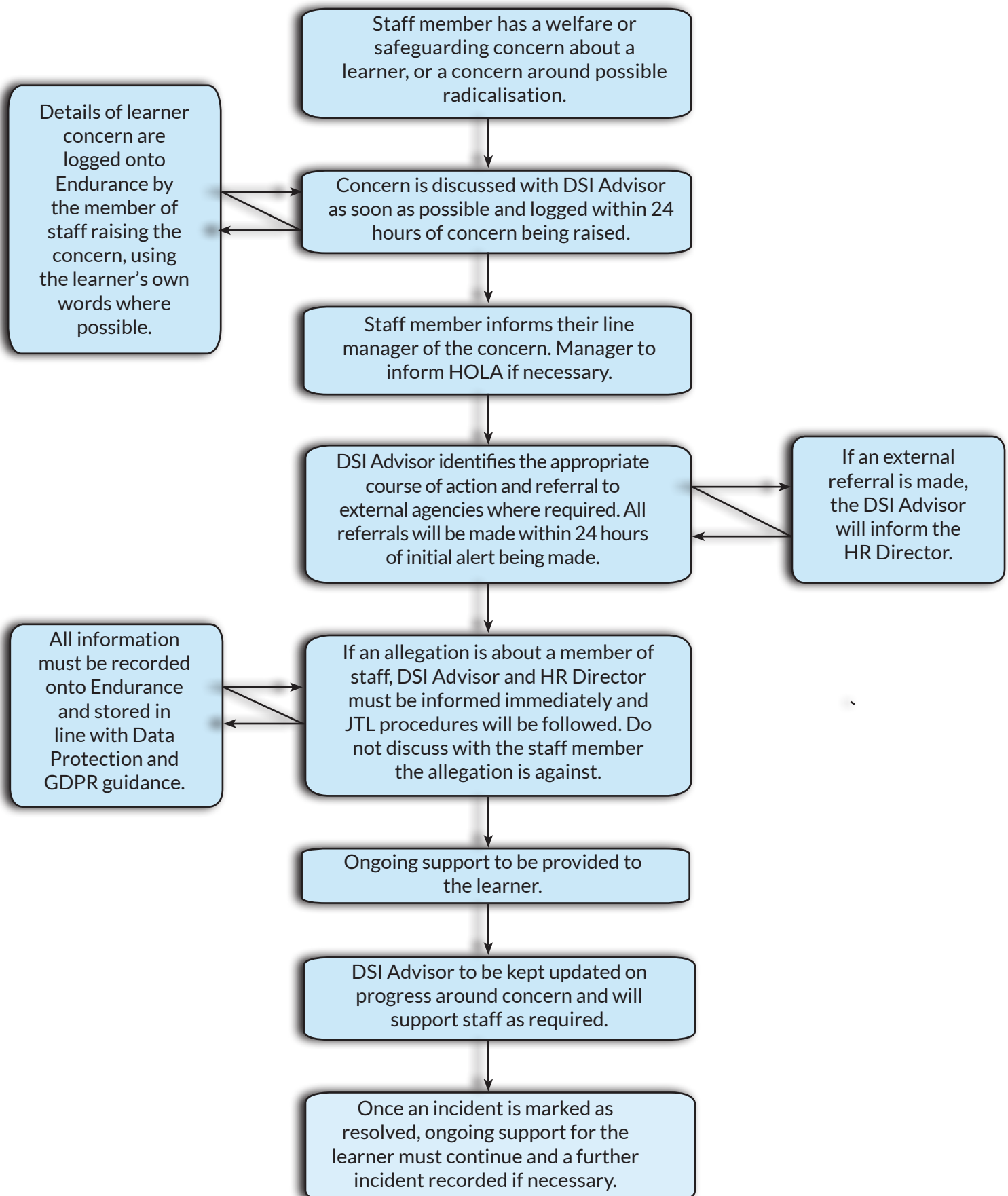
Appendix E: Information Sharing – Safeguarding

It is important to note that, when any suspicions or allegations of harm or abuse have been reported to JTL, there may be some circumstances where the welfare or safety of an individual may take precedence over confidentiality.

The seven golden rules to sharing information:

1.	Remember that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing but provide a framework to ensure that personal information about living individuals is shared appropriately.

2.	Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be, shared, and seek their agreement, unless it is unsafe or inappropriate to do so.

3.	Seek advice from other practitioners, or your information governance lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.

4.	Where possible, share information with consent and, where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.

5.	Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.

6.	Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up to-date, is shared in a timely fashion, and is shared securely.

7.	Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

Information Sharing – Advice for practitioners providing safeguarding services to children, young people, parents and carers July 2018 (HM Government) provides more detailed guidance.

Appendix F: Safeguarding and Prevent Reporting Process Flow Chart

Staff member has a welfare or safeguarding concern about a learner, or a concern around possible radicalisation.

Details of learner concern are logged onto Endurance by the member of staff raising the concern, using the learner's own words where possible.

Concern is discussed with DSI Advisor as soon as possible and logged within 24 hours of concern being raised.

Staff member informs their line manager of the concern. Manager to inform HOLA if necessary.

DSI Advisor identifies the appropriate course of action and referral to external agencies where required. All referrals will be made within 24 hours of initial alert being made.

If an external referral is made, the DSI Advisor will inform the HR Director.

All information must be recorded onto Endurance and stored in line with Data Protection and GDPR guidance.

If an allegation is about a member of staff, DSI Advisor and HR Director must be informed immediately and JTL procedures will be followed. Do not discuss with the staff member the allegation is against.

Ongoing support to be provided to the learner.

DSI Advisor to be kept updated on progress around concern and will support staff as required.

Once an incident is marked as resolved, ongoing support for the learner must continue and a further incident recorded if necessary.

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