

SAFEGUARDING AND PREVENT POLICY AND PROCEDURE

1. POLICY STATEMENT

Jarvis Training Management Ltd (JTM) is committed to ensuring that the wellbeing, and health and safety of staff, learners/apprentices and stakeholders always remains a priority. JTM fully recognises its legal responsibility and statutory duties and is committed to the protection and support of all individuals, especially those who are vulnerable.

LAW AND STATUTORY GUIDANCE

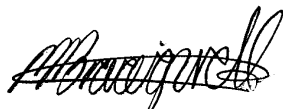
This policy is in line with the following Acts and Guidance documents that are in place to protect children, young people and vulnerable adults:

- Keeping Children Safe in Education 2021
- Draft Keeping Children Safe in Education 2022
- Working Together to Safeguard Children 2018
- Work based learners and the Prevent Duty statutory Duty
- Criminal Exploitation of children and vulnerable adults: County Lines
- Counter Terrorism and Security Act 2015
- Ofsted Education Inspection Framework
- Ofsted FE and Skills Handbook February 2022
- Ofsted 2021 Review of Sexual Abuse in Schools and Colleges
- Equality Act 2010
- Children Act 2004
- Safeguarding and Vulnerable Groups Act 2006
- Protection of Freedoms Act 2012
- Human Rights Act 1998
- Children and Families Act 2014
- Modern Slavery Act 2015
- Data Protection Act 2018
- Sexual Offences Act 2003
- Further Education and Higher Education Act 1992
- What to do if you're worried a child is being abused - Advice for practitioners

Appendix 1 outlines links to full legislation guidance documents.

2. POLICY REVIEW

This policy is reviewed at least annually or on a or risk assessed basis. The last review took place on 6/5/22.



MIKE BRACEGIRDLE
Managing Director – Jarvis Training Management Ltd

3. POLICY PURPOSE

Safeguarding relates to the responsibility to prevent or respond to potential or actual harm to children or vulnerable adults whether from crime, other forms of abuse or from being drawn into terrorism, extremism and/or radicalisation type related activities.

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Jarvis Training Management Ltd (JTM) will:

1. At all times, and by all means, seek to create a safe environment for staff and learners
2. Operate the policy to encompass children, young people and vulnerable adults
3. Promote safeguarding, British values, welfare and safety to our staff, learners, employers and stakeholders.
4. Develop the knowledge, understanding and ability of our learners, employers and staff to apply British Values, equality, diversity and inclusion within their workplace and everyday lives.
5. Acknowledge that abuse may take many forms: physical abuse, sexual abuse, child on child abuse, emotional abuse, neglect, bullying, radicalisation and risk to self and/or others which are listed in this policy.
6. Protect children, young people and vulnerable adults and give individuals the information and tools they need to know how to protect themselves in their day to day lives, including online.
7. Promote positive mental health and wellbeing and highlight what our learners, staff and employers can do to look after their mental health.
8. Work with external agencies, such as Prevent Co-ordinators and Leads, Local Safeguarding Boards, Police and/or Social Services whilst always placing the welfare of the individual at the centre of any action taken.
9. Ensure safe recruitment in checking the suitability of staff and volunteers to work with learners
10. Ensure staff undertake appropriate, and relevant, on-going training and development so that they understand their statutory duties when working with children, young people and vulnerable adults.
11. Ensure all staff and learners are aware of and familiar with all safeguarding policies and procedures, and forms part of their induction into the organisation.
12. Ensure safeguarding is promoted and embedded throughout the learner journey, from recruitment through to completion, ensuring safeguarding is embedded throughout the curriculum plans.
13. Employers will be actively engaged and supported in the safeguarding process, responsibilities and expectations are clearly outlined during recruitment and induction processes and highlights during quarterly review meetings. Employers will also be kept up to date by their Assessor via the monthly safeguarding bulletins issued by the safeguarding team.
14. Work in partnership with other agencies, recognising it is essential in promoting the welfare and safety of vulnerable individuals, and that a multi-agency approach will ensure the most suitable care and protection is made accessible

4. POLICY SCOPE

This policy applies to all staff, learners, employers, and stakeholders. We recognise that all our learners and staff have a right to equal protection from all types of harm or abuse. We recognise that some individuals may be more likely to suffer from abuse or harassment if they consider themselves to have any of the nine protected characteristics defined in the Equality Act 2010.

This policy encompasses the Prevent Duty and Channel. The government has defined extremism in the Prevent Duty 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.

We recognise that the **Prevent Duty** is not about preventing learners / staff / stakeholders from having political and religious views and concerns, but about supporting them to use those concerns or act on them in non-extremist ways. We consider it our duty to protect all learners and staff from exploitation and radicalisation and to promote the Prevent Duty and the understanding of the Channel process. The designated Prevent lead will liaise with

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partners, regional Prevent Officers and the Local Authorities to keep up to date with local and national threats, policies and procedures relating to Prevent and any changes will be reflected in JTM's Prevent Risk Assessment and Action Plan.

Channel is about early intervention to protect and divert people away from the risk they face before illegality occurs. This multi-agency approach is intended to protect people at risk from radicalisation and uses existing collaboration between local authorities, statutory partners, the police and the local community to identify individuals at risk of being drawn into terrorism; assess the nature and extent of that risk and develop the most appropriate support plan for the individuals concerned.

British Values are defined as:

- Democracy - *society characterised by equality of rights and governments that are representative of the will of the population subject to a free electoral system.*
- Rule of Law - *the principle that all people and institutions are accountable to law that is fairly applied without exception.*
- Mutual respect and tolerance - *permissive attitude toward those whose opinions, beliefs, practices, racial or ethnic origins differ from one's own.*
- Individual Liberty - *the notion that all individuals can freely express themselves through the freedom of speech and lawful actions without interference from the state.*

5. DEFINITION OF SAFEGUARDING

The definition of safeguarding, prevent and promoting the welfare of children and vulnerable adults covers the following:

- Child on child abuse
- Child criminal exploitation and county lines
- Child sexual exploitation and trafficking (CSE)
- Domestic abuse
- Female Genital mutilation (FGM)
- Serious violence and sexual harassment, including derogatory language and behaviours
- Harmful sexual behaviour
- Cybercrime
- The Prevent Duty, including radicalisation and extremism
- Neglect
- Physical, sexual, emotional, racist, disability and homophobic abuse
- Bullying, including online bullying and prejudice-based bullying
- Gender based violence against women and girls
- Forced marriage and (so called) honour-based violence (HBV)
- Modern slavery and human trafficking
- Protecting individuals from the impact of technology on sexual behaviour
- Teenage relationship abuse
- Substance misuse
- Gang activity and youth violence
- Fabricated or induced illness
- Poor parenting
- Homelessness
- Children required to attend court
- Children who go missing from education
- Children with family members in prison
- Protecting individuals from maltreatment

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- Preventing the impairment of individual health, both physically and emotionally, and wellbeing
- Bullying (including cyberbullying)

The policy covers what actions an employee should take if they happen to encounter a situation that is in breach of the Safeguarding rules.

6. DEFINITION OF A VULNERABLE ADULT

The definition of a vulnerable adult is someone who:

- Is or may be in need of care by reason of mental or other disability, age or illness preventing the impairment of their health or development
- Is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

7. AIMS OF SAFEGUARDING

The main aims of the JTM Safeguarding policy are:

- 1.1. To ensure that appropriate measures and practice to safeguard and promote the welfare of children and vulnerable adults are in place and bring matters requiring attention to the relevant person, (i.e. Designated Safeguarding Lead/Team the Line Manager or the General Manager). This includes those under the care and responsibility of the adults who receive our services.
 - All staff, learners and employers should have a good understanding of safeguarding concerns, the Prevent Duty, including potential abuse and possible radicalisation of children and young people, which may come to light in the workplace.
 - JTM staff, and those who undertake work on our behalf, maintain a strong focus on safeguarding children, young people and vulnerable adults.
 - Staff recognise, identify and respond to signs of abuse and other safeguarding concerns relating to children and vulnerable adults.
 - Staff respond appropriately to disclosure by a child, or vulnerable adult, of abuse.
 - Staff respond appropriately to allegations against staff, other adults, and against themselves.
 - Staff are alert to the risks which abusers, potential abusers or extremists, may pose.
 - Staff contribute as necessary to all stages of JTM safeguarding and protection processes
 - Staff undertake the relevant and ongoing training for Safeguarding, including the Prevent Agenda and development to maintain a safe workforce.
 - Staff promote and develop learners' understanding of safeguarding, British Values, positive behaviours and learner wellbeing through teaching and learning activities and through the pastoral support that is provided.
 - Risk assessments are completed for Safeguarding and the prevent duty and identify local referral agencies, Local Prevent Leads and Local Safeguarding Partnership Boards for both Children and Adults.
 - Resources are provided to improve the personal safety of learners, reduce the likelihood of radicalisation and to improve their awareness of these issues through curriculum and training.
 - Seek to minimise peer on peer abuse through pastoral support and teaching and learning activities. Information is provided on resources such as our safeguarding bulletin and within training on how to spot types of peer to peer abuse and effective ways to tackle it.

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- Emergency contact details for learners are collected on the application form if we ever need to contact in the event of a concern.

8.RECRUITMENT ACTIVITY & SAFEGUARDING

Where appropriate, the JTM recruitment procedure ensures that from the identification of a vacancy through to the selection and the formal offer of a contract, applicants are aware of the requirements of disclosure checks and the company safeguarding policies.

Applicants are required to self-disclose all previous convictions and cautions (spent and unspent) on the JTM Application Form so consideration to suitability can be assessed at the earliest opportunity. Identity and right of work checks are undertaken, along with professional qualifications and an Enhanced DBS check where relevant, depending on roles within the organisation. All staff who work on behalf of JTM are fully aware that disclosure numbers are requested and kept on a central register where appropriate.

9.RESPONSIBILITIES

- The Board has overall responsibility for ensuring that a Safeguarding and Prevent Policy and procedure is in place and for monitoring its effectiveness.
- The Designated Safeguarding Lead (DSL) is responsible for overseeing the implementation of the policy and procedure within the organisation, including ensuring that training has taken place and that incidents are reported and acted upon in accordance with procedure and in a timely manner.
- It is the responsibility of all staff and governors to undertake annual mandatory safeguarding training to ensure they keep their knowledge up to date and send copies of certificates to the DSL for records.
- The DSL is responsible for informing the relevant social services department of concerns over the abuse or neglect of children and vulnerable adults.
- If a member of staff, during their work, discovers that an act of FGM appears to have been carried out on a girl under the age of 18 it must be reported to the police through our safeguarding procedure.
- JTM legal responsibility under the Prevent Duty to make sure staff and learners:
 - Undertake training in the Prevent Duty
 - Are aware of when it is appropriate to refer concerns about learners or staff to the Designated Safeguarding Lead or Deputies.
 - 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.
 - Implement the Channel process if required
- Expectations for behaviour and attendance of learners is outlined in the Learner Induction Booklet which is issued at the start of training. All learners are expected to apply these behaviours throughout their programme. Persistent failure to do so may lead to informing the Apprenticeship and Training Manager and General Manager, who hold the right to terminate a learner's programme
- KCSIE: All staff must read and understand the document "Keeping Children Safe in Education 2021 Part 1" and JTM's Safeguarding Policy and Procedures, as well as make referrals as soon as is possible if an incident or concern comes to their attention.
- Staff have a responsibility to be aware and alert to signs that all is not well with a vulnerable person. However, they are not responsible for diagnosing or investigating abuse. All staff have a responsibility to make a referral through the safeguarding procedure if a disclosure of abuse is made or a serious cause for concern is raised.

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- Confidentiality is central to the work of JTM and staff disclosing a concern must ensure they do so in sensitive and confidential manner, informing the Safeguarding Team via the Logging a concern form.
- We will ensure electronic files containing sensitive or confidential data is stored securely and password protected, known only to the members of the safeguarding team.

10. ALLEGATIONS AGAINST A MEMBER OF STAFF

Staff may be subject to abuse allegations. An allegation may be said to be information which comes to light suggesting that a person who works or volunteers with a child has:

- Behaved in a way that has harmed a child, or may have harmed a child .
- Possibly committed a criminal offence against or related to a child.

Concerns may also arise about:

- A persons behaviour in their personal life may impact upon the safety of the child whom they have a duty of care.
- A persons behaviour with regards to his/her own children.
- The behaviour in the private or community life of a partner, member of the family or household

JTM's Designated Safeguarding Lead, Senior Managers and Board members will follow the procedures as detailed in Part 4 of KCSIE 2021 and liaise and work with all relevant services such as LADO, social services, police or Ofsted to assist in the investigation to achieve a safe and fair outcome.

See **appendix 2** for the full procedure for Managing Allegations Against Staff.

11.PROCEDURE

Where there is a Child Protection or Safeguarding concern.

Staff should be guided by the following principles:

- Children, young people and vulnerable adults have a right to be safe and should be protected from all forms of abuse and neglect;
- safeguarding is everyone's responsibility;
- it is better to help children, young people and vulnerable adults as early as possible, before issues escalate and become more damaging;
- children and families are best supported and protected when there is a co-ordinated response from all relevant agencies
- staff maintain an attitude of "it could happen here"

A concern regarding abuse usually falls into one of the three categories listed:

- A child, young person or vulnerable adult discloses abuse
- A third party reports a child, young person or vulnerable adult is being abused
- There are signs and indicators which point to abuse, these may be observed over a period of time or be a single incident.

Reporting and responding to concerns for the safety and welfare of a child , young person or vulnerable adult.

If you think a child is in immediate danger call for police assistance.

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Where there is risk of significant harm the Designated Safeguarding Lead or in their absence a Deputy Safeguarding Lead, should be informed immediately, they will then:

- Ensure the concern is acted upon immediately within the same working day.
- Determine the most appropriate course of action:
- Where the concern reveals a risk of significant harm or the learner is in immediate danger, the DSL will refer the matter to the police and /or social care services.
- There are a number of possible outcomes to a referral to Children's Social Care (CSC). If the concerns meets thresholds for intervention CSC will begin an assessment (section 17 Child in Need or section 47 Child Protection). It maybe that the DSL or staff member maybe asked to be involved with this assessment.
- Where the risk is considered less serious, a referral for an Early Help assessment maybe made. This maybe a multi-agency response, and JTM staff may be asked to have some input into this process.

OR

- The needs of the learner can be supported and monitored in house with pastoral support.
- If at any time during the early help support, those involved consider the risk to the learner is increasing, the matter must be escalated to social care services.
- If a staff member believe that their referral has not been dealt with sufficiently or appropriately, they have the right to refer this to a senior member of staff who is not the DSL or to the local social services department themselves.

Workplace concerns.

If a safeguarding concern arises within the workplace, these concerns **must** be raised with the line manager/DSL within the workplace following their Safeguarding procedures, a JTM Logging a Concern form should be completed and forwarded to JTM DSL or Deputy DSL for information, who will then liaise with the workplace DSL in regards to the response to the concern.

JTM Logging a concern form.

A written record of welfare concerns or a disclosure of abuse should be made as soon as possible, however, this should not delay taking action to ensure the learner is safe and reporting concerns to the DSL or Deputy DSL.

A concern form **must** be completed within one working day of the concern being raised and forward to the DSL or Deputy DSL, if raising the concern directly with DSL or Deputies and not already completed, a concern form **must** be completed with one working day following this discussion and forwarded to the DSL.

See appendix 4 for Logging a Concern form and guidance notes for completion.

Dealing with a disclosure of abuse

If a child, young person or vulnerable adult talks about possible abuse, the member of staff should:

- Try to react calmly, never ever go and get another person to listen to the disclosure instead of you, there is a reason this child, young person or vulnerable adult has chosen you to make the disclosure to

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- Remember the child, young person or vulnerable adult will be anxious or frightened and even intimidated
- Confirm to the child, young person or vulnerable adult they have not done anything wrong. They are right to speak up and are not to blame
- Listen carefully and treat the information you are being given seriously. Do not ask direct questions. Avoid Who? What? When? Where?
- Encourage the child, young person or vulnerable adult to talk; do you want to talk about this? Never apply pressure on him/her
- Do not prevent the child, young person or vulnerable adult from recalling events, your role is to listen and make detailed notes of the conversation as soon as possible after the disclosure
- Reassure the individual but do not promise confidentiality, explain you will need to pass the information on to someone else who will be able to help – always let them know who this person is and only people who need to know will be given the information disclosed

The member of staff should NOT:

- Panic
- Allow their shock or distaste to show
- Probe for more information than is offered
- Speculate or make assumptions about what has happened
- Make negative comments regarding the alleged abuser
- Approach the alleged abuser
- Make any promises that you cannot keep, e.g. 'everything will be all right'
- Agree to keep the information given secret
- Delay getting emergency help if needed, e.g. medical help

When the child, young person or vulnerable adult has finished, make a detailed note on the cause for concern of the date, time, place, what was said and what happened, sign and date the form, if any other member of staff is present they should also sign the form, following the procedure detailed above.

If a third party reports a child, young person or vulnerable adult is being abused the incident form should also be completed with the third party and the information given to the Safeguarding Lead /Deputies who will then follow the relevant company procedure, following the procedure detailed above.

12. Identifying needs early.

Early Help is about taking action as soon as possible to tackle problems or concerns for a learner's health and wellbeing before they can grow into something that is more difficult to overcome, identifying additional needs early reduces the risk of difficulties escalating by providing the child, young person or vulnerable adult, timely and effective support.

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Signs that a young person or adult may benefit from early help include:

- displaying disruptive or anti-social behaviour
- being bullied or bullying others
- having work poor attendance
- having poor general health
- having anxiety, depression or other mental health issues
- misusing drugs or alcohol
- having a particularly challenging relationship with parents or appearing to be unusually independent from their parents
- experiencing difficulties at home, such as domestic abuse, parental substance abuse or parental mental health problems.

These may be signs and indicators which point to abuse or concerns for their health and wellbeing and may be observed over a period of time or be a single incident.

Please see appendix 5 for the internal reporting process that will take place once a concern is raised.

13. It is the responsibility of the Designated Safeguarding Lead to:

Take responsibility for maintaining the Single Central Register and ensuring safer recruitment practices are effective and implemented correctly.

Managing referrals.

The designated safeguarding lead is expected to:

- refer cases of suspected abuse to the local authority children's social care or adult services as required;
- support staff who make referrals to local authority children's/adult social care;
- refer cases to the Channel programme where there is a radicalisation concern as required;
- support staff who make referrals to the Channel programme;
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- refer cases where a crime may have been committed to the Police as required.

Work with others.

The designated safeguarding lead will:

- liaise with the board to inform them of referrals
- as required, liaise with the "case manager" and the designated officer(s) at the local authority for child protection concerns and
- liaise with staff on matters of welfare, safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies. Act as a source of support, advice and expertise for staff.

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Training.

- The designated safeguarding lead (and any deputies) will undergo training to provide them with the knowledge and skills required to carry out the role. This training will be updated at least every two years.

The designated safeguarding lead will undertake Prevent awareness training. In addition to the formal training, their knowledge and skills will be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- understand the assessment process for providing early help and intervention
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- ensure each member of staff has access to and understands the organisations safeguarding procedures
- are alert to the specific needs of learners in need, those with special educational needs and young carers;
- are able to keep detailed, accurate, secure written records of concerns and referrals;
- understand and support JTM with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting learners from the risk of radicalisation;
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children, young people and vulnerable adults and taking account of their wishes and feelings, among all staff, in any measures JTM may put in place to protect them.

Raise Awareness.

The designated safeguarding lead will:

- ensure the safeguarding policies are known, understood and used appropriately;
- ensure this policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with the Board regarding this.
- ensure this policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made
- link with the Local Safeguarding Partnership Boards to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

14.TRAINING

Jarvis Training Management ensure all staff and governors complete mandatory Safeguarding and Child Protection training as part of their induction. This also includes Prevent, Channel, ACT and WRAP and is designed to ensure all staff:

- Understand JTM safeguarding systems.
- Their responsibilities.
- They can identify any signs of abuse, neglect, exploitation or radicalisation and
- Know how to respond and report concerns.
- Are kept up to date with current and changing safeguarding trends, their mandatory safeguarding training is monitored and updated when needed.

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JTM are committed to updating safeguarding training for all staff annually, and more regularly as required, through CPD, monthly safeguarding bulletins, using the skills and knowledge of local partners and staff members.

To achieve this:

- Time will be given to enable this commitment to be met as part of each member of staff CPD schedule
- All new staff and learners will be attend appropriate safeguarding training as part of their induction.
- Monthly updates will be provided by the safeguarding team.

All board members will be sufficiently trained at board level and SMT and the Safeguarding Team will be trained at Level 3 DSL which will be renewed every 3 years as a minimum.

Training for Learners:

Learners will be informed about the importance of British Values from induction through to progress reviews, and is embedded across our broad and balanced curriculum/s within a diverse range of learning activities and accessible resources. Our curriculum intent is to encourage a positive caring attitude towards others, to understand others social and cultural traditions, and to support appreciation of the diversity of other people's cultures and beliefs.

Learners will complete the Education and Training Foundation 'Side by Side' training as part of their induction process which covers the following:

- Radicalisation and Extremism
- Staying Safe Online
- What Can You Trust?
- British Values

As part of their induction into JTM, learners will be issued with Safeguarding Activity Handbook and British Values Handbook. The main aim of the booklets is to ensure that learners are aware, have a good understanding, are engaged and vigilant about safeguarding concerns, this includes issues and risks associated with radicalisation. The booklets are embedded into the personal learning plan of each learner, ensuring that safeguarding remains a priority throughout their learner journey.

Monthly support visits and quarterly progress reviews will also focus on Safeguarding and Prevent to continue to develop the learners' knowledge and awareness of risks associated in their every day lives and know how to keep themselves safe.

15.Covid 19 response and Safeguarding.

To ensure, that as a further education establishment, JTM has measures in place to respond to any future Government guidance and guidelines in relation to the Covid 19 pandemic that ensures that our learners continue to receive a high-quality education and ongoing support, contingency plans are in place for all eventualities so that our stakeholders, staff, learners and employers are not affected by any ongoing restrictions .

See Emergency Planning and Covid 19 response policy.

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Safeguarding will remain a priority at all times at JTM. We have a robust safeguarding team in place with a Designated Safeguarding Lead and 2 Deputy Leads, who are also Pastoral Support and Prevent Leads.

Ongoing support for learners will continue regardless of whether restrictions are reintroduced and 121 support with pastoral will continue either face to face or remotely via Zoom / phone call. Any safeguarding or welfare concerns will continue to be raised using the Logging a Concern form with response timescales of one day.

We recognise that the online world provides everyone with many opportunities; however it can also present risks and challenges even more so during a time of restrictions and isolation, with greater use of technology and social media we have a duty to ensure that all our learners are protected from potential harm online.

121 teaching and learning sessions will continue via Zoom. Only learners who are over 18 years of age or those who are 16-18 years and who have written consent from parents will be asked to use video conferencing facilities.

Learners will continue to complete the Education and Training Foundation 'Side by Side' training as part of their induction process which covers: Radicalisation and Extremism: Staying Safe Online: What Can You Trust?: British Values. Online safety will continue to be embedded into the curriculum.

Safeguarding and welfare resources will be shared with assessors to distribute to learners and employers, as well as resources being uploaded to JTM's website and blog for access.

Safeguarding Bulletins will be issued on a monthly basis to staff, learners, employers and parents/carers covering a range of safeguarding and welfare issues and information. This includes staying safe online, healthy/unhealthy relationships, good mental health and wellbeing.

Support for learners with SEND:

Where particular needs are identified, assessor and pastoral support arrangements will be focused on individual requirements. This may include: additional teaching and learning resources, additional teaching sessions from sector specialist Assessors, more frequent pastoral support communications i.e. face to face visits/online zooms, phone calls etc. adaptations to assessment methods.

Covid status questionnaires will be completed by learners /employers and returned to assessors before site visits are undertaken.

16.MONITORING

The review of this policy is embedded in JTM's overall quality improvement processes and cycle:

The Safeguarding team will keep up to date with statutory guidance and ensure updates are included in the policy and issued to the board of Governors to approve before issuing to staff and learners where applicable.

- Monthly monitoring by Board of Governors via safeguarding reports from DSL/Safeguarding team.
- The Safeguarding Team will review and update the working of this policy annually at the start of each year.

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17.KEY CONTACT INFORMATION:

Governance Board Members:

Role	Name	Email	Telephone
Managing Director	Michael Bracegirdle	Michael.bracegirdle@jarvis-eu.com	07860 720 293
General Manager	Sarah McCarthy	sarah.mccarthy@jarvis-eu.com	07764 203 649
Apprenticeship and Training Manager	Claire Fairhurst	claire.fairhurst@jarvis-eu.com	07775 950 929
External Board Member	Maureen Deary	mail@maureendearry.co.uk	07715 609414
External Board Member	Bev Ellis	bevellis@trstraining.net	07749 270840

DSL, Deputy DSL and Safeguarding Team:

Role	Member of staff	Email	Telephone
Designated Safeguarding Lead and member of JTM's Safeguarding Team	Gina Stephens	gina.stephens@jarvis-eu.com	07867 260 276
Deputy Safeguarding Lead and member of JTM's Safeguarding Team	Tom Sumnall	tom.sumnall@jarvis-eu.com	07741743618
Deputy Safeguarding Lead, Pastoral Support and member of JTM's Safeguarding Team:	Janine Ridley	janine.ridley@jarvis-eu.com	07771672491
Additional staff who are DSL trained if the Safeguarding Team are unavailable:			
Managing Director	Michael Bracegirdle	michael.bracegirdle@jarvis-eu.com	07860720293
Operations Director	Christine Bracegirdle	chris.bracegirdle@jarvis-eu.com	07802748225
General Manager	Sarah McCarthy	sarah.mccarthy@jarvis-eu.com	07764203649
Apprenticeship and Training Manager	Claire Fairhurst	claire.fairhurst@jarvis-eu.com	07775950929

Please see **Appendix 3** for external support contact information.

17.RELATED POLICIES, PROCEDURES AND DOCUMENTS:

- SAFEGUARDING HANDBOOK
- BRITISH VALUES HANDBOOK
- LOGGING A CONCERN FORM
- SAFER RECRUITMENT
- LEARNER INDUCTION
- STAFF INDUCTION
- LONE WORKING

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- DATA PROTECTION / GDPR
- STORAGE RETENTION OF CASE RECORDS
- INFORMATION STORAGE AND RETENTION
- HEALTH AND SAFETY
- EQUALITY AND DIVERSITY POLICY
- EQUALITY ACTION PLAN
- WHISTLEBLOWING
- COVID-19 RESPONSE
- HEALTH AND WELLBEING

Appendix 1: LAW AND GUIDANCE DOCUMENTS.

- Keeping Children Safe in Education 2021
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1021914/KCSIE_2021_September_guidance.pdf
- Draft Keeping Children Safe in Education 2022
https://consult.education.gov.uk/safeguarding-in-schools-team/kcsie-proposed-revisions-2022/supporting_documents/KCSIE%202022%20for%20consultation%20110122.pdf
- Working Together to Safeguard Children 2018
<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>
- Work based learners and the Prevent Duty statutory Duty
<https://www.gov.uk/government/publications/work-based-learners-and-the-prevent-statutory-duty>
- Criminal Exploitation of children and vulnerable adults: County Lines
<https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines>
- Counter Terrorism and Security Act 2015
<https://www.legislation.gov.uk/ukpga/2015/6/contents/enacted>
- Ofsted Education Inspection Framework
<https://www.gov.uk/government/publications/education-inspection-framework>
- Ofsted FE and Skills Handbook February 2022
<https://www.gov.uk/government/publications/further-education-and-skills-inspection-handbook-eif/further-education-and-skills-handbook-for-september-2021>
- Ofsted 2021 Review of Sexual Abuse in Schools and Colleges
<https://www.gov.uk/government/publications/review-of-sexual-abuse-in-schools-and-colleges>
- Equality Act 2010
<https://www.legislation.gov.uk/ukpga/2010/15/contents>
- Human Rights Act 1998
<https://www.legislation.gov.uk/ukpga/1998/42/contents>
- Children Act 2004
<https://www.legislation.gov.uk/ukpga/2004/31/contents>
- Safeguarding and Vulnerable Groups Act 2006
<https://www.legislation.gov.uk/ukpga/2006/47/contents>
- Protection of Freedoms Act 2012
<https://www.legislation.gov.uk/ukpga/2012/9/contents>
- Children and Families Act 2014
<https://www.legislation.gov.uk/ukpga/2014/6/contents/enacted>
- Modern Slavery Act 2015
<https://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>
- Data Protection Act 2018
<https://www.legislation.gov.uk/ukpga/2018/12/contents/enacted>
- Sexual Offences Act 2003
<https://www.legislation.gov.uk/ukpga/2003/42/contents>

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- Further Education and Higher Education Act 1992
<https://www.legislation.gov.uk/ukpga/1992/13/contents>
- What to do if you're worried a child is being abused - Advice for practitioners
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What to do if you re worried a child is being abused.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf)

Appendix 2:

Procedure for managing cases of allegations against adults who work with children

1. INTRODUCTION

These procedures are based on statutory guidance contained within Keeping Children Safe in Education (2022) for dealing with allegations made against a person who works with or on behalf of children and will be applied by Jarvis Training Management when there is an allegation that a person who works or volunteers, for JTM, with a child and has:

- Behaved in a way that has harmed a child, or may have harmed a child and/or;
- Possibly committed a criminal offence against or related to a child and /or;
- Behaved towards child or children in a way that indicates he or she may pose a risk of harm to children; and /or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

These procedures will also be used where concerns arise about:

- A person's behaviour in their personal life which may impact upon the safety of children to whom they owe a duty of care
- A person's behaviour with regards to his/her own children
- The behaviour in the private or community life of a partner, member of the family or other household member.
- Where, following investigation, the allegation does not meet the harm threshold and is deemed to be a low level concern

If an allegation relating to a child is made about a person who undertakes paid or unpaid care of vulnerable adults, consideration will be given to the possible need to alert those who manage her/him in that role. These procedures will also be applied if a complaint or an allegation is made against a person in relation to her/his work with adult service users, which causes concern about the welfare of an adult service user's children.

Compliance with these procedures should help ensure that allegations of abuse are dealt with expeditiously and are consistent with a thorough and fair process.

When the allegation relates to circumstances, or occurs within a learners workplace, the Safeguarding and Allegation procedures of that workplace will be followed. JTM's General Manager will liaise with the manager within the placement and their LADO, ensuring the welfare and safety of the young person, ensuring proper procedures are being followed and offering support and involvement in the investigation if appropriate.

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2. THE LOCAL AUTHORITY DESIGNATED OFFICER (LADO)

The Local Children's Partnership boards and Local Authority ensure a LOCAL AUTHORITY DESIGNATED OFFICER (LADO) is identified who will:

- Be involved in the management and oversight of individual cases
- Provide advice and guidance to employers and voluntary organisations.
- Liaise with the police and other agencies.
- Monitor the progress of cases to ensure that they are dealt with as quickly as possible consistent with a thorough and fair process.

The LADO will not:

- investigate allegations; this responsibility lies with JTM /social care and / or the police and regulatory bodies such as Ofsted
- have direct communication with the person subject of the allegation or provide advice and support to the person subject of the allegation.
- provide HR advice in respect of suspension or dismissal. Decisions to suspend or terminate the employment of an employee will be the responsibility of JTM

3. RECOGNISING AND RESPONDING TO AN ALLEGATION

Allegations may arise from a number of sources including:

- A child or an adult
- A parent/carer
- A member of the public
- A professional body
- Police/Children's Services

There are different procedures for responding to allegations and complaints. JTM will ensure that the correct procedures are followed. As a general guide allegations refer to information or concerns which suggest a child or children have been avoidably hurt or harmed by an adult who owed them a duty of care (sometimes described as a person in a position of trust).

4. WHAT TO DO IF AN ALLEGATION IS MADE

The person to whom the allegation is reported must:

- Treat the matter seriously
- Ensure that the welfare and safety of the child/young person is ensured and they are supported as necessary.
- Report the matter immediately to the General Manager, or in their absences the Apprenticeship and Training Manager who will inform the Directors and Board of Governors. Where the General Manager is the subject of the allegation, the concern should be made to the another senior manager, Director or one of the board members (contact details can be found within Section 9 of this appendix)
- Make a written record of the information using the Logging a Concern Form, using the Child's/Parents' own words, including when the alleged incident took place, who was present; and what happened returning to the person the initial report was made, within 24 hours.
- Sign and date written record.

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- Confidentiality must be maintained at all times, the matter must not be discussed or shared with anyone other than to whom it is reported.

5. INITIAL ACTION

The Senior Manager will:

- Obtain a brief statement, signed and dated by the person receiving the allegation (Recorded on the Logging a Concern form)
- Countersign and date the written details
- Record any other information and names of potential witnesses
- Establish a chronology of significant events
- Consider any information already known about those involved
- Discreetly check any incident or log books.
- On the basis of these factors, make a professional judgement, and record the reason for any subsequent action taken.
- If the allegation meets, or appears to meet, any of the criteria in paragraph 1 above, meeting the harm /risk of harm threshold and is therefore an allegation, a referral to the LADO will be made within one working day.
- If the Senior Manager is unclear whether it meets the harm / risk of harm threshold they should seek advice from the LADO.
- Liaise with the employer /LADO if the allegation relates to a learners workplace.

If an allegation requiring immediate attention is received outside of normal hours the Senior Manager should consult immediately with the Emergency Duty Team or Local Police. They must ensure they inform the LADO the next working day.

6. CONSIDERATION OF THE ALLEGATION AND INVESTIGATION.

The Senior Manager will make an initial assessment, from available information, to determine if the threshold for an allegation is met.

In cases where it is not clear whether the threshold has been met, the Senior Manager and the LADO will discuss the incident and agree whether it meets the threshold.

Consideration will also be given to the risk or potential risk to both the child/children directly affected by the issue and any other children who may also be at risk, also, consideration will be made as to whether the subject of the allegation needs to be suspended from any contact with children. The decision to suspend will rest with JTM.

In consultation with the LADO , a decision will be made as to whether a strategy meeting should take place taking into consideration whether there is a need for:

- A police investigation because a crime has or may have been committed.
- Enquiries and assessment by Social Care to determine if services or emergency actions are required.
- If the person who has had an allegation made against them is a foster carer, the needs of other children in placement as well as the child to whom the allegation relates.

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The LADO and the Senior Manager which will agree:

- A plan of action
- Agreement about informing parents if they are not involved
- How and when to inform the subject of the allegations

Where the initial discussions leads to no further action, the General Manager and the LADO will record the decision and justification for it and agree on the information to be put in writing to the person concerned.

Where further enquires are required, the Senior Manager, in consultation with the LADO, will agree how and by whom the investigation will be taken.

7. Allegation Outcomes

The outcomes of any investigation will depend on the circumstance of the allegation, the evidence and information available, and possible outcomes range from no further action to dismissal to criminal prosecution.

Should the allegation be substantiated and the employee is dismissed, JTM will make a referral to DBS for consideration of whether inclusion on the barring list is required.

If the employee tenders their resignation or ceases to provide their services this will not prevent an allegation from being followed up in accordance with these procedures and a conclusion reached with a referral to the Disclosure and Barring Service (DBS).

A so called “compromise agreement” by which person agrees to resign, the employer agrees not to pursue disciplinary action and JTM will follow its policy of references to limit the response to confirm employment dates and the capacity in which the person was employed, in situations where there has been an allegation made against the employee.

Lessons learnt.

In all cases were there an allegation has been made, whether substantiated or not a review of the circumstance of the case will be made by the senior manager and LADO to consider the facts and determine whether lessons can be learnt and if improvements can be made

8. DEALING WITH LOW LEVEL CONCERNS.

What is a low level concern?

A low-level concern, is any concern that an adult has acted in a way that:

- Is inconsistent with them staff code of conduct, including inappropriate conduct outside of work
- Doesn't meet the threshold of harm or is not considered serious enough to refer to the LADO

Low level concerns are part of a spectrum of behaviour (KCSIE 2021). This may include:

- Inadvertent or thoughtless behaviours
- Behaviour that may be considered inappropriate depending on circumstances
- Behaviours which are intended to enable abuse

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Examples of such behaviours could include:

- Being over friendly
- Having favourites
- Adults taking photography's of children on their mobile phone
- Engaging with a child on a one to one basis in an isolated or secluded area
- Using intimidating or offensive language

Where it is decided that the incident does not meet the threshold of harm/risk of harm and is considered as a low level concern, then JTM will take steps to ensure any conduct or behaviour issues are addressed with the person through JTM's Disciplinary and Code of Conduct procedures.

Both the LADO and Senior Manager must keep and maintain appropriate records and ensure there is a chronology of discussions, decision and actions taken.

LADO LIVERPOOL

Role	Name	Email	Telephone
LADO & Risk Manager	Ray Said	lado@liverpool.gov.uk (Referrals)	0151 233 0840 07841 727 309
Deputy LADO (Liverpool)	Pauline Trubshaw		0151 233 0846

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APPENDIX 3: External support contact information :

<p>Prevention for Young Suicide</p> <p>If you are a young person at risk of suicide or are worried about a young person at risk of suicide:</p> <p>Call: 0800 068 4141 Text: 07860 039967 Email: pat@papyrus-uk.org https://papyrus-uk.org/</p>	<p>Housing / homelessness Shelter</p> <p>Housing and homelessness charity, offering advice and information</p> <p>Tel: 0808 800 4444 http://england.shelter.org.uk/</p>
<p>Bereavement Cruse</p> <p>Provides care to bereaved people</p> <p>Tel: 0808 808 1677 https://www.cruse.org.uk/</p>	<p>Mental Health MIND</p> <p>Advice, support and information</p> <p>Tel: 0300 123 3393 www.mind.org.uk</p>
<p>ChildLine Children/young people</p> <p>Offers confidential help and support to children and young people</p> <p>Tel: 0800 1111 www.childline.org.uk</p>	<p>Mental Health - BACP (British Association for Counselling and Psychotherapy)</p> <p>Sets standards and provides information about therapeutic practice</p> <p>Tel: 01455 883300 www.itsgoodtotalk.org.uk</p>
<p>Debt, benefits and rights Citizens Advice</p> <p>Confidential, impartial advice on rights and responsibilities.</p> <p>Search for your local Citizens advice by visiting: www.citizensadvice.org.uk</p>	<p>Sexual / domestic abuse National Domestic Violence Helpline</p> <p>Support service for women experiencing domestic violence, their family, friends, colleagues and others calling on their behalf</p> <p>Tel: 0808 2000 247 https://www.nationaldahelpline.org.uk/</p>
<p>Step Change – Debt Charity</p> <p>Offers free, anonymous debt advice for people in the UK.</p> <p>Tel: 0800 138 1111 https://www.stepchange.org/</p>	<p>Napac - Sexual / domestic abuse (National Association of People Abused in Childhood)</p> <p>Tel: 0808 801 0331 https://napac.org.uk</p>
<p>Drugs Frank</p> <p>Tel: 0300 123 6600 www.talktofrank.com</p>	<p>Sexual / domestic abuse Stop it now!</p> <p>Supporting adults in the UK to prevent child abuse</p> <p>Tel: 0808 1000 900 www.stopitnow.org.uk</p>
<p>BEAT Eating disorders</p> <p>Support and information relating to eating disorders - sufferers, carers and professionals.</p> <p>Helpline: 0808 801 0811 (over 18) Youth line: 0808 801 0711 (under 18) https://www.beateatingdisorders.org.uk/</p>	<p>Social isolation Carers UK</p> <p>Help for people who care for family or friends</p> <p>Tel: 0808 808 7777 www.carersuk.org</p>
<p>NHS Help Line for all non-emergency enquiries call 111</p> <p>Health advice and reassurance</p>	<p>Samaritans</p> <p>Offers confidential, emotional support for all 24/7 in a safe environment</p> <p>Free Phone Tel: 116 123 Email: jo@samaritans.org www.samaritans.org</p>
<p>Old Age Age UK</p> <p>Support for people aged 50 and over</p> <p>Tel: 0800 678 1602 www.ageuk.org.uk</p>	<p>Victims of crime - Victim Support</p> <p>Confidential help to victims of crime, witnesses and their families and friends</p> <p>Tel: 0808 1689 111 https://www.victimsupport.org.uk/</p>

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APPENDIX 4. LOGGING A CAUSE FOR CONCERN.

If the learner is at risk of significant harm, the DSL or deputy DSL **MUST** be notified immediately or as soon as possible within the same working day that there is a concern, contact details at the bottom of this form.

A logging a concern form must then be completed and forwarded to DSL or deputy within 24 hours.

If learner is at immediate harm contact emergency services.

If not an immediate safeguarding concern, concerns must be raised within 1 day of a worry being raised either by completion of this form or contacting DSL or deputy directly for further advice or guidance. A concern form is to be completed with 24hrs following any discussions.

Please see guidance document to help in the completion of information.

Learner's Name:	Date of birth:
Qualification:	
Date of incident or concern:	Time (of writing this report):
Person writing the report:	
Print name	Signature
Job Title:	
What are you worried about/what is the concern? (For specific incident or disclosure record date and time of incident).	
What does the learner say/ what are their worries? (using their words)	
What is working well for the learner? (i.e. what are their strengths and any protective factors surrounding learner)	
Any other relevant information? (i.e. background information of the learner, any actions already taken)	

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The above is a true account of our discussion and I agree to this information being shared with the Safeguarding Team within JTM (agreed and signed by learner).	Date:
Print name	Signature
If appropriate, has parent/carer been informed if not reason why?	

Check to make sure the report is clear and concise and will be understood by others
Please pass the completed form to your Designated Safeguarding Lead within timescales above.
 (Designated Person complete Part 2 overleaf)

PART 2 (to be completed by DSL/deputy DSL)

Time and date information received by DSL, and from whom				
Discussions or further information gathered (date, time, name, role, organisation)				
What does this mean? <i>What are the strengths and needs of the learner ?</i> <i>What is the impact on the learners daily life?</i> <i>What will happen if nothing changes ?</i>				
What needs to happen to reduce worry or concern and increase wellbeing ? If not referring on to Adult or Children's Services, reason why .				
Actions to be taken:				
Action	By whom	By when	Review date	Update

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Parents / 'others' informed: Yes / No (give reasons)	
Where can additional information regarding learner / incident be found? (Safeguarding file, incident book etc.)	
Signed:	
Print name:	
Date:	

Contact Details

Gina Stephens. Designated Safeguarding Lead gina.stephens@jarvis-eu.com 07867 260 276.

Tom Sumnall. Deputy Safeguarding Lead tom.sumnall@jarvis-eu.com 07741743618

Janine Ridley. Deputy Safeguarding Lead janine.ridley@jarvis-eu.com 07771672491

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Guidance for completing Cause for Concern Forms.

Points to consider and example questions

Ensuring there is a clear understanding of the concern – both the risks and the strengths of the learner, is dependent on asking good questions. Gaining comprehensive information which enables us to fully assess and respond to the concern in an appropriate and timely way is important, below are a points for you to consider and possible questions you may ask when having discussions with the learner and completing the form. For learners who are also parents, particularly of children under 18 years old , it is important that we have some understanding of how the worry or concern maybe impacting on their children and wider family members and so some of the points reflect this.

What are we worried About?	What’s working well?
<ul style="list-style-type: none"> • What are you worried about? • What have you seen/ heard that worries you? • How do you know? What evidence do you have? • What harm has happened to the learner? • What do you think most worried the learner? • How do they feel about this? • Does the learner feel safe, are they living in a safe environment at home/work /in the community? • Is there anyone you feel sacred of ? • When did the problem happen? • Has it happened before? How often was it? How bad was it? • How did the worry/concern affect the learner? • Has their learning/progress been impacted? • Are their children/family being impacted by this worry/concern? • Is the learner’s parenting affected by this concern, how are they managing day to day care of their family? • Which part of this worries you the most? 	<ul style="list-style-type: none"> • What’s working well for the learner ? • What do you like about the learner what are his/her best qualities? • How is their learning/work progressing? • Who are the people who care most about the learner, do they have a support network of friends/family ? • What does the learner say are the best things about their life? • Have there been times when this problem has been dealt with or was even a little bit better? How did that happen? • When were things good ? • What would the learner need to see that would make them say this problem is completely sorted out? • Who or what has helped the learner most so far? • Exceptions question regarding the concerns, e.g. “Tell me about a time when the problem could have happened but didn’t.” • When were things worse/better?..... • How did you know things were better then?.....

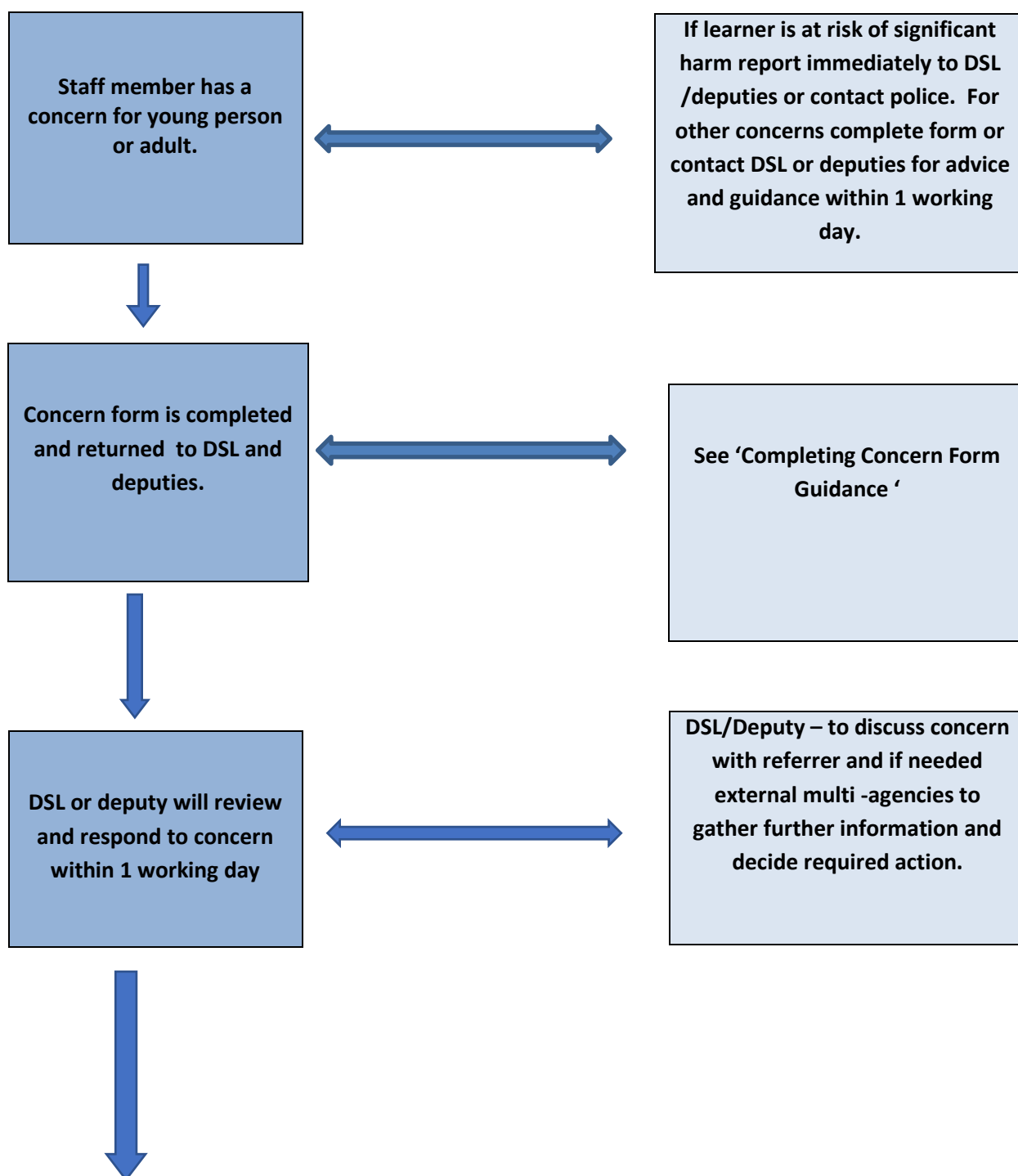
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- | | |
|---|--|
| <ul style="list-style-type: none">• What do you think is the worst thing that could happen because of this problem?• When did you start to worry about this learner?• What has changed that has made you more concerned? What are you worried will/ might happen if nothing changes?• What could be the impact of this on the learner?• Is there anything that has been making this problem harder to deal with?• Are there things happening in your life or family that make this problem harder to deal with?• How do you think this is impacting on your children/family.• What are the first, worst and last times this has happened?• What were the triggers for this? | <ul style="list-style-type: none">• What did that look like to you, tell me more about..... When things are good what does that look like to you?• When things were good - what difference do you think it made to to you/your family? How could you tell?• What do you think is the next step that should happen to get this worry sorted out?• What would you need this to look like for you not to have to worry?• Can you think of one small manageable step that would improve things for you?• What would be happening if things were working better for you• Tell me about what a good day looks like for you? What makes it a good day?• What are you most proud of in your life? |
|---|--|

SAFEGUARDING AND PREVENT POLICY AND PROCEDURE

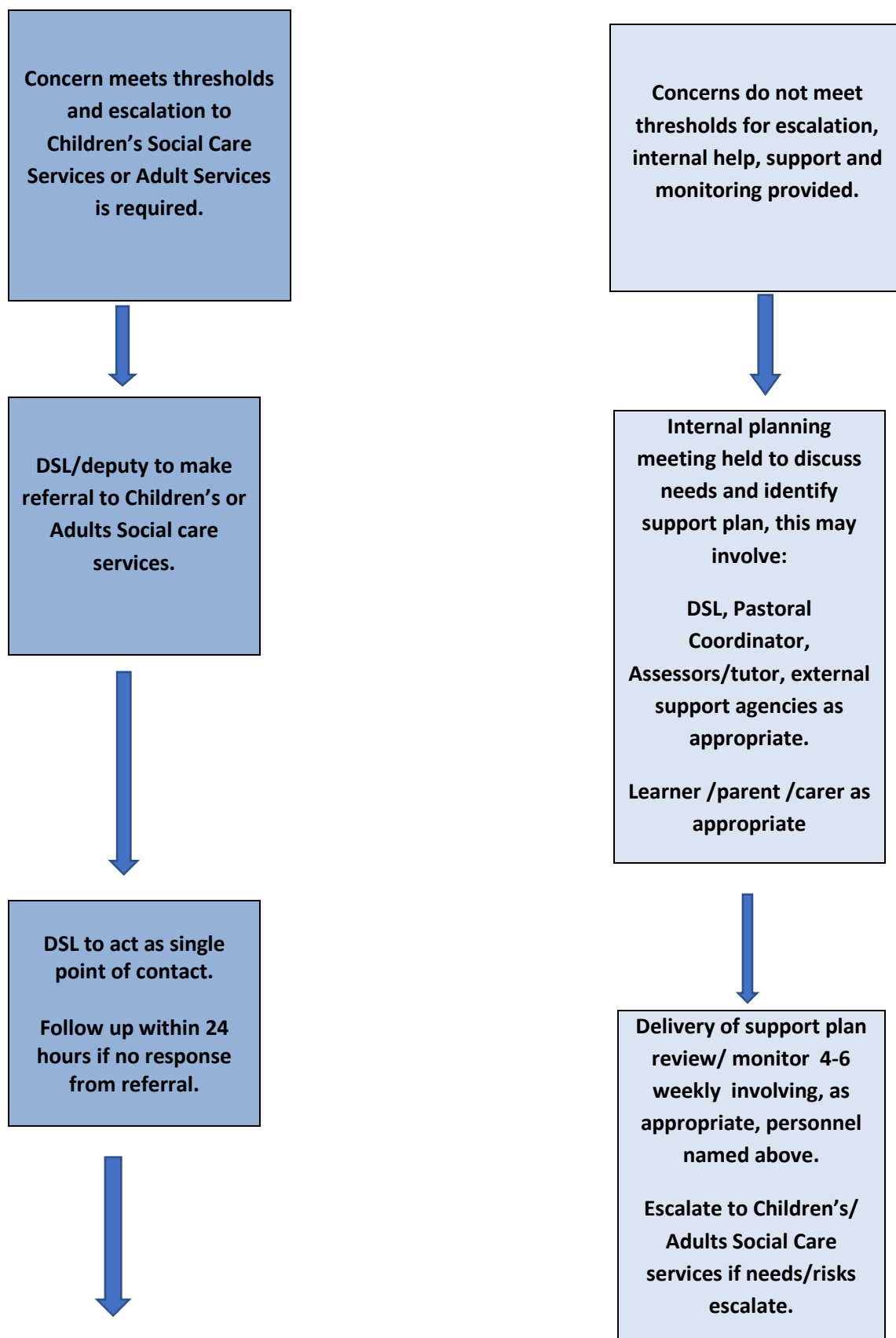
APPENDIX 5.

Procedure for Responding to Safeguarding Concerns.



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Possible Actions/ Outcomes



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If threshold are met for statutory assessment , JTM staff will contribute to, and be involved in any multi-agency plan of support and meetings.

OR

Needs do not meet thresholds, no further action from statutory service – internal help and support provided.



On gong cycle of support and review (4-6 wkly) until needs/risk are reduced and case can close.

Or

Needs/risks escalate and need to step up to statutory services.