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## Policy Statement

JFC Training College strongly acknowledges the need for vigilant awareness of safeguarding issues. All staff have appropriate training so that they understand their roles and responsibilities and are confident about carrying them out.

Any individual should feel secure that they could raise any issues or concerns about the safety or welfare of children, young people and adults at risk and know that they will be listened to and taken seriously. This will be achieved by maintaining a culture of safeguarding by demonstrating zero tolerance of abuse and other harmful behaviours, promoting the welfare of children, young people, adults at risk and protecting staff.

Under duties imposed as part of the [Prevent Duty Guidance 2015](#), JFC College will ensure that situations are suitably risk assessed, staff will work in partnership with all parties, that all staff are suitably trained.

At JFC College we recognise and uphold the statutory duty to prevent people being brought into and affected by terrorism or violence under the Counterterrorism and Security Act 2015. The Centre Manager Banji Oladimeji has ultimate responsibility for Safeguarding at JFC Training College.

## Scope

This Safeguarding and Prevent policy applies to all staff, including senior managers, paid staff, volunteers, contractors, learners also referred to as apprentices, employers and anyone working on behalf of or with JFC Training Colleges.

## Background

In recent years there have been increasing concerns about the safety and welfare of children, young people and vulnerable adults. JFC have traditionally considered the welfare of young people as part of their Duty of Care obligations. Whilst there is currently no specific directive relating to this, legal opinion is that there are several statutory and other provisions relating to safeguarding that could be applied to JFC and which JFC would be expected to consider. These include:

- [The Education Act \(2002\) Section 175](#)
- [The Children Act \(1989 and amendments\)](#)
- [‘Keeping Children Safe in Education - September 2022](#)
- [Working Together to Safeguard Children 2018](#)
- [Children & Social Work Act 2017 – safeguarding reforms](#)
- [“Safeguarding Children and Safer Recruitment in Education’ \(Dept. for Children, Schools and Families 2011\).](#)

- [Working together to safeguard children: A guide to inter-agency working to safeguard and promote the welfare of children' \(Dept. for Children, Schools and Families 2010\).](#)
- [Care Act 2014](#)
- [Sexual violence and sexual harassment between children in schools and colleges \(publishing.service.gov.uk\)](#)
- [Prevent Duty Guidance for England issued under section 29 of the Counter terrorism and security Act 2015.](#)
- [What to do if you are worried a child is being abused 2015](#)
- [Protection of Freedoms Act 2012](#)
- [Prevent Duty Guidance](#)
- [Modern Slavery Act 2015](#)
- [Safeguarding Children: Working Together Under the Children Act 2004](#)

JFC Training College understands that our work in safeguarding and protecting children, young people and vulnerable adults must always have regards for the national guidance issued by the Secretary of State and should be in line with local guidance and procedures. We understand the term safeguarding to mean that we will take all reasonable measures to ensure that the risk of harm to children and vulnerable adults' welfare is minimised.

We also understand that, where we have any concerns about a learner's welfare, we will take all appropriate action to address those concerns by working in full partnership with other agencies.

JFC Training College has taken the view that in the interests of good practice there should be a clear policy and associated practices to guide work with children, young people and vulnerable adults. All staff at JFC understands that a range of other college policies are central to many aspects of the college's Safeguarding and Child Protection Policy.

## **Principles**

JFC Training College believes that children, young people and vulnerable adults have rights as individuals and should be treated with dignity and respect. The College will strive to provide a safe environment for any apprentice/learner in its care while they are studying at the College, visiting the College or participating in college activities.

Children, young people and vulnerable adults could be studying in any part of the College. The College runs taster programmes during the year and summer schools for learners, the staff also visit the local youth organisations as part of raising aspiration and recruitment activities.

- This policy and procedures are based on the following principles:
- The welfare of children, young people and vulnerable adults is of primary concern

- All children, young people and vulnerable adults, whatever their age, culture, disability, gender, language, racial origin, socio-economic status, religious belief and/or sexual identify have the right to safeguarding from abuse
- It is everyone's responsibility to report any concerns about abuse or suspected behaviour of a learner to the Designated Safeguarding Officer. It is the responsibility of the Social Services Department and the Police to conduct, where appropriate a joint investigation
- All incidents of alleged poor practice, misconduct and abuse will be taken seriously and will be responded to swiftly and appropriately
- All personal data will be processed in accordance with the requirements of the [Data Protection Act 1998](#).

## Promoting Safeguarding

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

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

The training received is continually reviewed to ensure most appropriate and up to date training is given. Aligning with the mandatory duty surrounding the Government's [Counter Terrorism and Security Act 2015 all](#) staff undertake Prevent training aligning with their role within JFC.

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

There is reference to safeguarding in all team meetings – carried out bi-monthly, with managers utilising the information in the monthly safeguarding and equality newsletters as well as a health and safety section, to stem discussions.

Key individuals involved in staff recruitment complete an in-house safer recruitment training course annually.

Learners are made aware of all of JFC's relevant policies, who the designated persons are and how to report a concern during their induction to the programme. There is also a dedicated support site on the learner information portal/learning community to signpost to information, advice, and guidance for a wide range of support needs, and a direct email address to allow the learners to access support from the designated safeguarding officer

confidentially. An essential information guide containing the same information is made available during the enrolment process.

All learners/apprentices receive a mandatory L1 or 2 safeguarding, prevent, ED, online safety, British values training as part of their induction training.

Safeguarding is embedded in the curriculum and in progress reviews, which gives the learner chance to discuss safeguarding with their tutor.

Learners are issued with a learner welfare card/ flyer detailing both internal and external support services. This contains contact details for police, JFC head office and direct link to the safeguarding team. It also provides details of an external learner welfare assistance programme, which is a 24-hour confidential helpline which will provide learners with a counselling service, or signposting to relevant support experts should they require it. During the COVID 19 pandemic the learner helpline flyer is distributed to compliment remote working and avoid close contact

Monthly topics in relation to equality and diversity and safeguarding are highlighted by an externally written newsletter which appears alongside internal Information advice on guidance on a range welfare issues in the JFC newsletter. Learners are encouraged to contribute to the newsletter with topics covering safeguarding and welfare. Learning translated to learners surrounding these activities is discussed and documented at each visit, along with pastoral checks.

### **Definition of Abuse**

- Abuse is any behaviour towards a person that deliberately or unknowingly causes him/her harm, endangers life or violates their rights. Abuse may be:
- Physical: examples include, lapping, pushing, kicking, rough handling
- Sexual: examples include rape and sexual assault or sexual acts to which the young person or vulnerable adult has not consented.
- Emotional/ Psychological: repeatedly being made to feel unhappy, humiliated, and afraid or devalued by others.
- Financial or material: stealing or denying access to money or Possessions
- Neglect and acts of omission: examples include ignoring medical or physical care needs, failure to provide access to appropriate health.
- Discriminatory: abuse motivated by discriminatory attitudes towards race, religion, gender, disability or cultural background.

## **Responsibility**

All College staff, apprentices and learners are required to take shared responsibility for the safeguarding and safety of any young people and vulnerable adults in the premises. They must be aware of and abide by the College's Code of Good Practice.

All College staff is in a position of trust, in particular those staff who teach, support, guide or in any way and interact with apprentices/learners, young people and vulnerable adults visiting the College.

The managerial responsibility for any programme or activity rests with the individual who is directing or organising the activity. This person is expected to:

- Ensure that the activity is planned, organised and delivered in accordance with the Safeguarding Children, Young People and Vulnerable Adults Policy
- Provide a 'safeguarding Children, Young People and Vulnerable Adults Safeguarding Statement
- Arrange the checking, training, induction and guidance for all staff and Volunteers
- Inform the College's Designated Safeguarding Officer and to complete the appropriate documentation.
- To complete a health and safety risk assessment.

The Director has responsibility for the overseeing of the College's Safeguarding Children, Young People and Vulnerable Adults Policy with delegated responsibility to relevant members of the Management Team.

The Director has nominated the Quality Manager as the senior member of staff responsible for children, young people and vulnerable adults safeguarding issues within the College (the Child and Vulnerable Adult Safeguarding Officer (CVAO)) and she will liaise directly with other staff members as deemed necessary.

The College expects all (either apprentices/learners or from the public) who came onto the premises to abide by the College's Policy, including all safety instructions issued by the College and the College Code of Behaviour.

## **Responsibilities on the part of the Institution**

All College staff is in a position of trust, in particular those staff who teach, support, guide or in any way interact with learners, children and vulnerable adults. It is incumbent all staff to be aware of this and to always act accordingly.

The College already has processes in place to check the suitability of staff and apprentices/learners working directly with learners. Some staff across the College will be in regular or significant occasional contact with adults during their teaching or other work. The College is committed to ensuring that all such staff has satisfactory Disclosure and Baring Services (DBS) checks. In addition, DBS Checks will be carried out every three years as appropriate for all delivery staff that has direct contact with young people and adults

The College will additionally ensure that all student helpers, mentors, etc who are in regular or significant occasional contact vulnerable adults must have had a satisfactory enhanced DBS check undertaken by the College before allowing them to work with children, young people or vulnerable adults.

A 'satisfactory' check is defined as having no criminal convictions (including cautions, reprimands and final warnings) relevant to the post.

All staff or student helpers still employed to look after learner must report any subsequent criminal convictions to the HR. Failure to do so will result in disciplinary action being taken.

### **Establishing a Caring Environment**

All staff is responsible for making JFC Training College a safe and caring environment for all including young people and vulnerable adults

A Caring Environment is one:

- In which the health, safety and welfare of young people has been assessed and catered for.
- In which staff are alive to the possibility of abuse/radicalisation and take measures to prevent that possibility.
- Where there is a sound and known reporting system for any incident
- Where staff takes reasonable and practical precautions to avoid any suspicions of abuse being brought against them.

### **Child Safeguarding Procedures**

Where apprentices/learners are concerned, there are statutory responsibilities for any organisation to follow regarding the safety of children and young people.

The College has a Designated Safeguarding Officer to be the lead person regarding safeguarding issues. At JFC College the Designated Safeguarding Officer is Banji Oladimeji.

All College staff must contact the Designated Safeguarding Officer or the Director of Studies if they have any cause to believe the student or young person involved in any activity in the College, covered by this policy is in any way at risk. The Designated Safeguarding Officer will follow the relevant procedures.

Records will be kept of all such incidents and their outcomes and held by the Designated Safeguarding Officer in accordance with the Data Protection Act.

All staff should be aware that in accordance with statutory requirements where child safeguarding issues are involved, it is not possible to offer confidentiality to a person as any disclosures must be reported.

## **Vulnerable Adults**

Where possible JFC Training College will identify vulnerable adults and ensure that there are appropriate support measures in place. This is most likely to be when the apprentice/learner presents to, or is referred to, Student Services and clearly has mental health difficulties or a disability that puts them into the legal definition of 'vulnerable'.

Any member of staff across the College with concerns regarding an adult student whom they believe or know to be vulnerable must contact the Designated Safeguarding Officer.

## **Safeguarding apprentices/learners who may be vulnerable to exploitation and female genital mutilation**

Our safeguarding policy provides the basic platform to ensure that children, young people and vulnerable adults are given the support to respect themselves and others, stand up for themselves and protect each other.

## **Safeguarding Changes**

1. [Keeping children safe in education 2022: for school and college staff \(part 1\)](#) – This law requires that all staff be aware of critical aspects of keeping children safe to guide their actions.
2. **Cyberflashing will become a new criminal offence** ([stated in UK Government Press release 'Cyberflashing' to become a criminal offence](#))
  - a. Definition: cyberflashing typically involves an offender sending an unsolicited sexual image to people via social media, dating apps and or by bluetooth for the purpose of their own sexual gratification or to cause the victim humiliation, alarm or distress. It also involves sharing intimate images of a person without their consent to cause them humiliation, harm and or distress.
3. **Upskirting is now a form of abuse and a criminal offence** (listed in paragraph 157 specifically on page 40 of [Keeping Children Safe in Education 2022](#))
  - a. **Definition:** upskirting is typically when a photograph is taken under a person's clothing without them knowing, for sexual gratification or to cause the victim humiliation, distress or alarm.
4. **New information on serious violent crime**

- a. All staff need to know the indicators that may signal those children are at risk from, or are involved with, serious violent crime. Including:
  - (a) Unexplained gifts/new possessions – these can indicate children have been approached by/involved with individuals associated with criminal networks/gangs
  - (b) Increased absence from school
  - (c) Change in friendship/relationships with others/groups
  - (d) Significant decline in performance
  - (e) Signs of self-harm/significant change in wellbeing
  - (f) Signs of assault/unexplained injuries
- b. Staff should also be aware of the associated risks and understand the measures in place to manage them.

## **Female Genital Mutilation (FGM)**

### **Definition**

Female genital mutilation (FGM) is a collective term for procedures which include the removal of part or all external female genitalia for cultural or other non-therapeutic reasons. The practice is not required by any major religion and is medically unnecessary, painful and has serious health consequences at the time it is carried out and in later life.

Several girls die as a direct result of the procedure, from blood loss or infection. Girls may be circumcised or genitally mutilated illegally by doctors or traditional health workers in the UK, or sent abroad for the operation.

### **Female Genital Mutilation Act 2003**

Female circumcision, excision (female genital mutilation) is illegal in United Kingdom by the Female Genital Mutilation Act 2003, except on specific physical and mental health grounds. More information can be found on the Home Office website.

Female Genital Mutilation is a form of child/young person abuse and as such is dealt with under the college Safeguarding policy. At JFC Training College the Director of Studies and the senior management expect Safeguarding to be everybody's responsibility and expect all staff to adhere to and follow these policies.

### **Identifying girls at risk of FGM**

A young person from a practicing community may be at risk of FGM but it cannot be assumed that all families from practicing communities will want their females to undergo FGM. A female young person may be taken out of the country for a holiday for the procedure to be carried out abroad with time for recovery, but there is also evidence that FGM is carried out in the UK.

Girls are particularly vulnerable during the summer holidays, both for female genital mutilation and forced marriage. All staff members are encouraged to be particularly alert to the signs of potential abuse at this time of year.

Alerts to imminent FGM may include:

- A professional hearing reference to FGM e.g., having a „special procedure“.
- A disclosure or request for help if the girl or the young person is aware or suspects she is at risk.
- Parents taking the child out of the country for a prolonged period.
- The girl talking about a long holiday to one of the countries where FGM is practiced.

The practice of female genital mutilation tends to run in families, this means, if one family member is identified as being at risk of undergoing FGM or has undergone FGM, risks to other female family members must be recognised.

### **The College Procedure**

JFC Training has decided to take proactive action to protect and prevent our young people (girls) being forced to undertake FGM in the following ways:

- A robust attendance monitoring and policy that requires detailed explanation on taking long period of time out of training or placement.
- FGM training for safeguarding leads and disseminated training for all staff at the front line dealing with learners.
- FGM discussions by safeguarding lead with young people from practising communities who are at risk.

Any concerns regarding female genital mutilation must be acted upon in accordance with the college policy and local guidance. Please see below for specialist group which provide advice and support.

Foundation for Women’s Health, Research and Development (FORWARD)

Unit 4; 765 - 767 Harrow Road

London NW10 5NY

Telephone: 020 8960 4000

[www.forwarduk.org.uk](http://www.forwarduk.org.uk)

Equality Now

5th Floor 6 Buckingham Street

London WC2N 6BU

Telephone: 020 7839 5456

[www.equalitynow.org](http://www.equalitynow.org)

## REPORTING A CONCERN – JFC’s Procedure for dealing with concerns

- a. If a learner raises a concern/allegation with you: If the learner has a concern over their own personal welfare and wellbeing, you are to listen to and record all information given, making no judgement or assumptions. Take any actions required to secure the immediate safety of the child or adult at risk if deemed appropriate, this may involve staying with them until a responsible adult can be located. This will only be recorded on the Safe Log, if learner agrees and raised with the manager, if learner agrees. If the learner gives consent, you must report the issue to a designated officer. If you feel the learner’s safety and wellbeing are at risk and they do not give consent for the matter to be escalated, you should escalate only when you believe the matter would deteriorate if additional support was not sourced. You should always consider the wishes of the individual, even those aged under 18. Guidance should be sourced with a safeguarding officer if you are unsure. The designated officer will then decide the appropriate course of action, and if a referral outside the organisation is appropriate.
- b. If a Coach /Tutor/EPA has concerns over a learner: This might be through observation, alleged by others or discussion. To follow procedure set out as point (a)
- c. If a learner/parent has a concern/allegation about a member of JFC staff: All learners are to be informed that if they have a concern over their own personal welfare and wellbeing that they do not feel comfortable talking to their coach /tutor about, they are to contact JFC’s Designated Officer. Contact details for the designated person are available in this policy, and the college website.
- d. If a parent contacts you to report a concern about their child, ensure you listen and record the details as per a learner reporting a concern to you. Ensure you have contact details for the parent. You must report the issue to the designated officer. The designated officer will then decide the appropriate course of action, and if a referral outside the organisation is appropriate, liaise with the parent as appropriate. Be mindful of confidentiality as all learners aged 16 and above, and of employed status are deemed to be adults, and therefore no information should be passed to parents or carers without prior consent to do so from the learner.
- e. It is important you do not pass any information to other parties or try to investigate the concern yourself. All concerns should be reported to [safe@jfctrainingcollege.co.uk](mailto:safe@jfctrainingcollege.co.uk) in the first instance.
- f. If you require an immediate response, call your sector designated safeguarding officer immediately, it is noted that the designated officer may not be available out of normal working hours, so in circumstances where the individual is in immediate danger report the incident to the police on 999.
- g. The designated officer will endeavour to make initial contact with regards the concerns within 24 hours (not including weekends).

- h. The designated officer will assess if the individual is at risk of significant harm and decide upon the next course of action, this can range from offering signposting to support agencies to referral to the police and local safeguarding authorities. This may also involve passing information to the DBS.
- i. Also be mindful of any subcontract arrangements in place for the learner. In some instances, safeguarding officers at other companies might need to be informed. Ensure you pass to the safeguarding officer the name of the subcontractor. For employer providers we partner with, their safeguarding officer must be informed, and they take the lead in dealing with the concern. We will support where required.
- j. If you feel a designated safeguarding officer has not complied with their duty of care to a reported learner concern, please contact the designated safeguarding lead identified in this policy. If you feel the designated safeguarding lead has not complied with their duty of care to a reported learner concern, please contact the Director of Studies. You may also escalate the concern yourself to the relevant external agency.

## **Managing allegations against employees**

- Part 4 of DFE guidance ‘Keeping Children Safe in Education’ (September 2021) sets out revised procedures for managing safeguarding allegations or concerns against teaching staff, other staff, volunteers, and contractors. In this revised guidance training providers are now expected to respond to two levels of concern about staff behaviour:
  - (1) Behaviour that meets a perceived ‘harms’ threshold and
  - (2) Behaviour judged as a ‘low level’ concern’ that does not meet the ‘harms’ threshold.

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

Alongside our Code of Conduct and Safeguarding policies which detail the expected behaviours JFC will also:

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

Alongside the processes below employees are also able to report concerns through JFC's Whistle blowing line, following the whistle blowing procedure detailed in the Whistle blowing policy.

### **Allegations that may meet the harms threshold**

JFC will consider that behaviour meets the harms threshold to be if; employees – including employees on temporary contracts, volunteers or contractors have:

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

If a safeguarding allegation or concern is reported about another member of staff (including staff on temporary contracts, volunteers, and contractors) posing a risk of harm to a learner, this should be reported to the Designated Safeguarding Lead (DSL). Where there are concerns/allegations about the Safeguarding Lead this should be referred to Director of Studies.

If the allegation identifies that a learner has been harmed, is at immediate risk of harm or is an emergency, the DSL will contact social care services and where appropriate the police immediately. They will also ensure that:

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

- Where a concern is raised about the designated safeguarding lead, it should be reported to Director of Studies. The Director will then lead on the processes detailed above.

All reports will be recorded in JFC's case management system.

### **Low level concerns that do not meet the harm threshold**

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

JFC will seek to identify and deal with inappropriate behaviour early, to mitigate the risk of abuse. Low-level concerns about a member of staff, volunteer or contractor should be reported to the designated safeguarding lead. Where a low-level concern is raised about the designated safeguarding lead, it should be reported to Director of Studies. The designated safeguarding lead will collect as much evidence as possible by speaking directly to the person who raised the concern (unless raised anonymously), to the individual involved and any witnesses. The information collected will be reviewed against the employee code of conduct, then determine what further action may need to be taken, including liaising with HR should the disciplinary policy need to be followed.

All low-level concerns should be recorded in the SAFE Case Management system by the designated safeguarding lead (or deputy).

Records will be reviewed periodically so that potential patterns of concerning behaviour can be identified. Where a pattern of such behaviour is identified (including where low-level concern move to meeting the harms threshold) JFC will decide on a course of action.

### **Role of the College's Child and Vulnerable Adult Safeguarding Officer**

The role of the Designated Safeguarding Officer is:

- To receive information about events that are planned in the College that may involve young people or vulnerable adults, and plans that indicate how safeguarding will be covered.
- To receive information from any staff, volunteers, children, parents, or carers who have child safeguarding concerns and record it.

- Assess the information promptly and carefully, clarifying and obtaining more information about the matter as appropriate.
- Consult initially with a statutory child safeguarding agency to test out any doubts or uncertainty.
- Make a formal referral to a statutory child safeguarding agency or the police.
- Record statements from any member of staff who feels that a young person has indulged in inappropriate behaviour or made sexually suggestive comments or approaches.

## **Reporting and Monitoring Procedures**

All members of staff working closely with children and vulnerable adults must be alert to possibilities of abuse and any concerns about the behaviour of any adult with respect to that child should be reported to the Designated Safeguarding Officer who will decide what further action to take.

It is the duty of staff to inform only not to investigate – this is the role of the Police and Social Services.

If staff, in the course of their work at the College, have a child safeguarding issue brought to their notice, this must be treated as a priority over all other work.

Guidance regarding a specific incident may be obtained from the Designated Safeguarding Officer.

An oral, and then written report should be provided to the Designated Safeguarding Officer who will keep a confidential record of any such incidents.

## **Allegations of abuse or inappropriate behaviour involving staff**

Allegations involving a member of staff and a vulnerable adult should be reported to the Director and to the Designated Safeguarding Lead.

Consideration will be given as to whether the situation falls within the definition of abuse.

## **Training**

In accordance with good practice, the College will ensure that the Designated Safeguarding Officer, officers deputed to act on her behalf and other staff likely to be in regular contact with vulnerable adults receive appropriate training. This will also include student staff employed as ambassadors and in similar roles.

The following topics must be covered:

- a. Health and safety issues
- b. Handling a disclosure
- c. Reporting an allegation
- d. Confidentiality
- e. Code of Practice and Code of Behaviour

The College will also provide information to raise awareness to ensure that all staff understands what to do if a student/learner or visitor covered by this policy discloses abuse or any other safeguarding issue.

### **Media Relations**

For any College activity involving young people, parents or guardians must be given the opportunity to refuse permission for photographs, videos or other images to be made of their children and for the children to be interviewed by press, broadcasters or other media.

### **Information Technology**

The college will ensure that appropriate levels of filtering, which consider the impact of social media networking sites and the threat of exposure to extremism and radicalisation have been utilised in consultation with relevant IT providers, together with training in line with the Colleges' E-safety policy and Information Technology, this is to ensure that our learners are kept safe on-line.

### **Health and Safety**

All users of College Services must be made aware of Health and Safety requirements and be prepared to abide by them.

### **Code of Practice for Staff**

All staff must be familiar with the College's Code of Practice for Staff

### **Code of Behaviour for Young People**

All staff must be familiar with the College's Code of Behaviour

Parents/carers of children participating in college activities must be made aware of the Code of Behaviour

### **Data Safeguarding**

It should be noted that although technically a "learner", consent is still required from young people in the same way as for an adult regarding matters of data protection.

### **Prevent Duty**

Prevent is 1 of the 4 elements of **CONTEST**, the government's counter-terrorism strategy. It aims to stop people becoming terrorists or supporting terrorism. JFC Training College will educate our learners about extremism and work together to prevent or stop extremism in our Centre.

Our commitment to meeting the Prevent Duty can be summarised as follows:

**P** – Promotion of Equality and Diversity and positive relationships between staff and students

**R** – Referral of any concerns via safeguarding staff to relevant authorities

**E** – Embedding British Values and education for students on all courses

**V** – Vetting guest speakers and removal of any posters or other materials of an extremist nature

**E** – Environment – a safe and secure site with CCTV, sufficient security procedures and online filters

**N** – News monitoring for any concerns in the locality

**T** – Training of staff to raise awareness of the signs and risks

### **The Prevent Strategy:**

Responds to the ideological challenge we face from terrorism and aspects of extremism, and the threat we face from those who promote these views.

- Provides practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support.
- Works with a wide range of sectors (including education, criminal justice, faith, charities, online and health) where there are risks of radicalisation that we need to deal with.

The strategy covers all forms of terrorism, including far right extremism and some aspects of non-violent extremism.

To enable JFC College to carry out its duties under the Counterterrorism and Security Act 2015. The threat levels associated with a terrorist activity can be identified with the following 5 categories:

- a. Critical- an attack is expected imminently
- b. Severe – an attack is highly likely
- c. Substantial – an attack is a strong possibility
- d. Moderate – an attack is possible but not likely
- e. Low – an attack is unlikely

The Home Office works with local authorities, a wide range of government departments, and community organisations to deliver the Prevent strategy. The police also play a significant role in Prevent, in much the same way as they do when taking a preventative approach to other crimes.

We use a range of measures to challenge extremism in the UK, including:

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- where necessary, we will prevent apologists for terrorism and extremism from travelling to this country
- giving guidance to local authorities and institutions to understand the threat from extremism and the statutory powers available to them to challenge extremist speakers
- supporting community-based campaigns and activity which can effectively rebut terrorist and extremist propaganda and offer alternative views to our most vulnerable target audiences - in this context we work with a range of civil society organisations
- supporting people who are at risk of being drawn into terrorist activity through the Channel process, which involves several agencies working together to give individuals access to services such as health and education, specialist mentoring and diversionary activities

### **Managing Risks and Reacting to Incidents**

To monitor risks and be ready to deal appropriately with issues which arise we will:

- Understand the kind of threat arising from violent extremism to gauge its impact directly or indirectly on our organisation and its activities.
- Respond to local events, national or international news that may impact our students and communities
- Ensuring plans are in place to respond aptly to a threat or incident

### **Preventing Extremism And Radicalisation**

JFC Training College is committed to providing a secure environment for learners, where they feel safe. All staff member at JFC Training College recognise that safeguarding is everyone's responsibility, irrespective of the role they undertake or whether their role has direct contact or responsibility for learners or not.

**Extremism** is defined in the 2011 Prevent Strategy 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.

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

**British Values** are democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs.

Preventing Extremism and Radicalisation is one aspect within the College plans to safeguard and promote the welfare of all learners, including staff in line with our statutory duties.

Extremists of all persuasions aim to develop destructive relationships between different communities by promoting division, fear and mistrust of others based on ignorance or prejudice and as a result, limiting the life chances of young people. The College does not

tolerate extremist views of any kind whether from learners, staff or senior management and other agencies.

As a college, we recognise that extremism and exposure to extremist materials and influences can lead to poor outcomes for learners and therefore this should be addressed as a safeguarding concern as set out in this policy. We also recognise that if we fail to challenge extremist views, we are failing to protect our learners.

Therefore, JFC Training College will provide a broad and balanced tutorial programme on this subject so that our learners understand and become tolerant of difference and diversity.

We will ensure that they feel valued and not marginalized. Any prejudice, discrimination or extremist views, including derogatory language, displayed by learners or staff will always be challenged and where appropriate dealt within our Disciplinary Policy and the Staff Code of Conduct.

### How we promote Prevent at JFC Training College

Prevent training for all College staff, students and governors is mandatory and will be delivered by the following methods:

Who?	How?
Learners/Apprentices	Policy available on the College website. Prevent awareness included in student induction sessions and in the Student Handbook. Information about Prevent delivered through mandatory tutorials and resources, and via attendance at and participation in Prevent and British Values related student activities
Board of Governors and Executive Board of Governors and Executive Management Team Management Team	Governors undertake mandatory training and receive updates; table regular discussions at Board meetings and in Exec meetings; national and local Prevent leads to attend meetings/discussions as appropriate; an annual briefing and report will be delivered outlining relevant changes to the Prevent agenda and detailing actions taken at the College to ensure compliance and student safety
College Managers	Receive mandatory training and updates; included in SMT meetings and bulletins.
All teaching staffs	Receive mandatory training and updates; briefings by Directors of Learning; 'All Staff' e-mails; visits to team meetings by Prevent leads if requested.

Business Support staff who interact with students	Briefing by line managers; copies of the policy to be distributed, undertake mandatory training and updates.
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In addition:

- All new members of staff will receive Prevent training as part of their induction programme.
- All agency staff, volunteers and contractors will be provided with appropriate training/updates regarding changes to the Prevent agenda.
- A Prevent section on the College website will provide relevant and up to date information, advice and guidance for staff.

### Actions to Implement and Develop Policy

1. **Reporting** All e-Safety incidents should be reported to the Designated Safeguarding Officer who will log the incident in the safeguarding database, and where necessary will engage with external agencies.
2. **Securing and Preserving Evidence** The Administrator should be contacted immediately following the reporting of any serious e-Safety incidents and asked to make copies of relevant access logs, files etc. If it is believed that an immediate risk of exposure to illegal or inappropriate materials, or mental distress exists to staff or learners, the computer or devices should be turned off immediately. ***You should not “shutdown” or log off as this may corrupt, delete, or overwrite evidence, the power supply should be turned off at the wall or the battery should be physically removed. The equipment should then be moved to a secure location.***
3. **Illegal Material or Activities** Where an e-safety incident is reported to JFC College, this matter will be dealt with very seriously. JFC College will act immediately to prevent, as far as reasonably possible, any harm or further harm occurring. If a learner wishes to report an incident, they can do so to their Trainer or to the Designated Safeguarding Officer. Where a member of staff wishes to report an incident, they must contact the Director.

Following any incident, JFC College will review what has happened and decide on the most appropriate and proportionate course of action. Sanctions may be put in place; external agencies may be involved, or the matter may be resolved internally. Depending on the seriousness of the incident. Serious incidents will be dealt with by Senior Management, in consultation with appropriate external agencies. The Administrator is responsible for involving senior managers and law enforcement agencies as required.

The Administrator will assume responsibility for obtaining, securing, and preserving appropriate additional evidence. For example, remote screen shots, web filter logs etc. If it is believed that there is a child protection issue the procedures outlined in the Safeguarding policy should be implemented.

4. **Indecent Imagery** It is a criminal offence to take, show, and share indecent images of children and young people, those under the age of 18 can face prosecution for taking indecent images of themselves and sharing them with others. (Section 1 [Protection of Children Act 1978](#)).

*Under no circumstances should any person make copies, including screen shots or print outs, of suspected child/ young person indecent imagery. Taking copies of such materials, even when intended for evidentiary purposes, is a crime.*

5. **Inappropriate Material or Activities** Inappropriate material or activities are considered to be any materials or activities which are considered as unacceptable by the Acceptable Use of IT policy.
6. **Staff Access to Inappropriate Material** Where it is suspected that a staff member has been accessing inappropriate material, or attempting to access, the time and date of the incident should be noted, and the concerns raised with the head of Human resources.
7. **Learner Access to Inappropriate Material** Where it is suspected that a learner has been accessing inappropriate material, or attempting to access, the time and date of the incident should be noted and brought to the attention of the Director. The Designated Safeguarding Officer should be contacted who may then liaise with the Administrator to take copies of relevant access logs etc.
8. **Cyber-Bullying** It can be defined as making use of IT to undertake to bully. Examples of cyber-bullying include, but are not limited to:
  - Sending offensive or abusive e-mails, instant messages, or “text” messages.
  - Inviting selected individuals to a chat room or website to discuss another individual who has not been invited.
  - Posting offensive, defamatory or abusive messages about an individual or group to a public or members only internet forum.
  - Using a digital camera to take humiliating images Incidents of actual or suspected cyber-bullying should be dealt with in accordance with the Anti-Bullying policy.
9. **Virus & Malware Protection** JFC College will do all that it can to make sure the JFC College’s network is safe and secure. Every effort will be made to keep security software up to date. Appropriate security measures will include the use of enhanced filtering and protection of Firewalls, servers, routers, workstations etc. to prevent accidental or malicious Access of systems and information. Digital communications, including email and Internet postings, over the JFC College network, will be monitored in line with the Acceptable Use of IT Policy.

The Director will make all reasonable efforts to ensure current, up to date, anti-virus and malware protection is installed on all JFC College’s systems. However, users of the systems have a responsibility to:

- Alert the Administrator if they discover a fault with their anti-virus and anti-malware software.
- Ensure personally assigned devices (i.e. laptops) are connected to the network at least once per month.

### **Indicators of vulnerability to radicalisation**

Indicators of vulnerability include:

- The learner is distanced from their cultural/religious heritage and experiences discomfort about their place in society.
- The learner may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends.
- Personal Circumstances may include migration; local community tensions; and events affecting the learner's country.
- The learner may have perceptions of injustice; a feeling of failure; 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 and understanding the consequences of their actions.

However, this list does not mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

More critical risk factors may include:

- Being in contact with extremist recruiters;
- Accessing violent extremist websites, especially those with a social networking element;
- Possessing or accessing violent extremist literature
- Using extremist narratives and a global ideology to explain personal disadvantage;
- Justifying the use of violence to solve societal issues;
- Joining or seeking to join extremist organisations; and
- Significant changes to appearance and/or behaviour
- Experiencing a high level of social isolation resulting in issues of identity crisis and/or personal crisis

The Prevent Duty, introduced as part of the Counterterrorism and Security Act 2015 legally requires a range of organisations including schools, local authorities, further education institutions, police and health organisations to take steps to prevent people from being drawn into terrorism.

The new duty builds on this and reinforces their existing duties by spreading understanding of the risks and current good practice across the country. Building resilience of young people and vulnerable adults and the promotion of fundamental British values are at the heart of preventing radicalisation.

All JFC Training College, staff and associates will play a part in encouraging learners to discuss controversial issues and be given the knowledge and confidence to be able to challenge extremist beliefs and ideologies.

### **Referral and Intervention Process**

It is the role of the Designated Safeguarding Lead to ensure that staff understand the issues of radicalisation, can recognise the signs of vulnerability or radicalisation and know how to refer their concerns. It is also their responsibility to ensure that staff receives safeguarding concerns about young people who may be vulnerable to the risk of radicalisation or are showing signs of radicalisation and make referrals to appropriate agencies regarding concerns about radicalisation and to liaise with partners, including the local authority and the police.

As part of our commitment to safeguarding and promoting the welfare of young people and adults who may be considered vulnerable in all its training activities, the College will play an important role in protecting and safeguarding young people and vulnerable adults from the risks of radicalisation and extremism.

### **E-Safety**

The internet is an important education tool, but also carries risks associated with unwanted contact and bullying, inappropriate content, commercial exploitation and radicalisation toward extremism and terrorism.

The safeguarding responsibilities extend to the online world so that we can maximise the opportunities of digital technology and help young people and vulnerable adults to use the internet safely and responsibly.

At JFC College there is a focus on raising awareness and understanding of e-Safety issues amongst learners via the Designated Safeguarding Officer and the Trainer/administrative team. This will include the availability of e-safety resources for learners.

The policy applies to all learners and particularly young people and adults who may need support and all staff, volunteers, partners, and families living and working at JFC College, other external facilities, in the workplace or distance or online learning.

An e-Safety incident is considered to have occurred when a learner or staff member instigates, or is the victim of, an activity which utilizes Information and Communications Technologies (ICT) to endanger the personal safety, mental wellbeing, or financial wellbeing of another individual.

Activities which will be considered e-Safety incidents include, but are not limited to, the use of ICT to:

- Access, view, copy or download illegal content, or materials, including, but not limited to:
  - Child pornography
  - Materials inciting racial hatred or violence
  - Materials that are deemed to be in connection with radicalisation or will place learners at risk of radicalisation.
- Access, view, copy or download inappropriate content, or materials
- Bully or harass an individual or group (Cyber Bullying).
- Commit fraud or identify theft.
- Undertake any activities which would be in violation of the Child Protection, Protection of Vulnerable Adult or Anti-Bullying policies
- Any other incident where it can be reasonably considered that the personal safety, mental wellbeing or financial health of an individual has been endangered by the use of ICT.

In this context ICT includes, but is not limited to:

- a) JFC College owned equipment, including:
  - Desktop PC's
  - Servers
  - Laptop/Tablet devices
  - Telephones, both fixed and mobile
  - Digital video camera or camcorders
  - Digital audio recording devices
  - Reproduction devices (scanners, printers, etc.)
  - Any and all software and IT services provided by JFC College
- b) Privately owned ICT equipment (including personal mobile phones), when:
  - Connected to any JFC College owned network
  - Utilised to access JFC College software and services
  - Made use of on campus, or in the pursuit of JFC College business.

## **Responsibilities**

It is the responsibility of every staff member to give full and active support for the policy by ensuring:

- The policy is accessible, known, understood, and implemented.
- All actual and suspected serious e-Safety incidents are reported to the Designated Safeguarding Officer.
- Parents/Guardians, providers, sponsors, employers, and other stakeholders have a responsibility to report any e-Safety concerns they may have to JFC College.
- All learners have a responsibility to:

- Report any e-Safety concerns they may have to a member of staff; this could be an assessor.
- Not engage at any time in any form of behaviour which would result in the occurrence of an e-Safety incident.

## **Freedom of Speech and Expression**

Freedom of Expression is a fundamental right under both British and European law and is protected by Article 10 of the European Convention on Human Rights. The article 10 allows for restrictions to be placed for specific purposes. JFC Training College permit freedom of speech and expression of beliefs and ideas as fundamental rights underpinning our society's values. Everybody within the society have the right to speak freely and voice their opinions. However, this must come with accountability and free speech that is intended to influence the vulnerable or leads to violence and harm of others is against the moral values in which freedom of speech is based on.

Section 43 of the Education (No 2) Act 1986: requires the College to issue and keep up to date a code of practice to be followed by members, learners, and employees of the College for the organisation of meetings and other events, which are to be held on College premises, and for the conduct required of members, learners, and employees of the College in connection with meetings and other events.

Staff, visiting speakers and learners of the College must conduct themselves to ensure that freedom of speech is within the law. The College believes that a culture of free, open, and robust discussion can be achieved only if all concerned avoid needlessly offensive or provocative action and language.

## **External Speakers**

Any external speakers must be approved by the Director of Studies and all concerns and final decisions will be the responsibility of the Quality Manager. The Director of Studies will rate the risks associated and decide on the appropriate outcome. There should be sufficient information about the event including topics and any speakers and sufficient notice to allow for checks to be made and cancellation to take place, if necessary, prior to the event.

Any staff or learners that become aware of any incidents or instances where off the college premises events of concern are promoted on the college premises should be reported immediately to the Director of Studies. This may be through a learner's tutor.

All staff members will be issued with JFC:

- 1. Safeguarding Children/Child Protection and Vulnerable Adults Policy**
- 2. Indicators of vulnerability to radicalisation**
- 3. Behaviour Policy**

## Other Legislation

Some of the other legislation that safeguards children, young people and adults in the UK:

- [Adoption and Children Act 2002](#)
- [Adoption and Children Act 2006](#)
- [Children Act 1989](#)
- [Children Act 2004](#)
- [Data Protection Act](#)
- [Education Act 2002](#)
- [Freedom of Information Act](#)
- [Human Rights Act](#)
- [Protection of Children Act](#)
- [Sexual Offences Act 2003](#)
- [Safeguarding Vulnerable Groups Act 2006](#)
- [Sexual violence and sexual harassment between children in schools and colleges \(publishing.service.gov.uk\)](#)

## Appendix A

### CODE OF GOOD PRACTICE FOR STAFF, APPRENTICES, LEARNERS and VOLUNTEERS

The following guidelines are intended to be a common-sense approach that both reduce opportunities for the abuse of young people and vulnerable adults and help to protect staff, students and volunteers from any false allegation.

You SHOULD:

- Treat all young people and vulnerable with respect and respect their right to
- personal privacy
- Ensure that, whenever possible, there is more than one adult present during activities or that you are within sight or hearing of others
- Exercise caution when discussing sensitive issues with children or vulnerable adults
- Exercise caution in initiating any physical contact with a young person or vulnerable adults
- Operate within the guidance offered by this Code
- Challenge all unacceptable behaviour and report all allegations or suspicions of abuse
- Keep parents fully informed of all anticipated activities

You should NOT

- Spend excessive time alone with young people or vulnerable adults away from others
- Take young people or vulnerable adults alone in a car journey, however short
- Take young people or vulnerable adults to your home
- Engage in physical or sexually provocative games including horseplay
- Allow or engage in inappropriate touching of any form

- Make over-familiar or sexually suggestive comments or approaches to a young person or vulnerable adult even as a 'joke'
- Enter changing rooms or bedrooms that are assigned to the opposite sex unless there is an emergency
- Let allegations, over familiar or sexually suggestive comments or approaches made by a young person or vulnerable adult go unchallenged or unrecorded.
- Do things of a personal nature that young people or vulnerable adults can do for themselves.
- Take photographs, videos or other images of a young person without the express permission of their parents

## **Appendix B**

### **CODE OF BEHAVIOUR FOR YOUNG PEOPLE AND VULNERABLE ADULTS**

JFC Training College is a Further and Higher education College for the education of students over the age of 18. All people visiting the College, either privately or with an organised group, are expected to respect the College, its staff, students and its buildings and grounds.

The College seeks to offer visitors a safe and caring environment. In return, you must:

- Respect the rights and dignity of each other and of the staff and other helpers
- Respect the rules of the College which include:
- Purchase, sale and consumption of alcohol, recreational/nontherapeutic drugs and substances for abuse is forbidden
- Smoking is banned in all buildings at the College and is only allowed within outdoor shelters specifically designed for this practice.
- All rules and safety/emergency procedures such as fire drills must be followed
- Participants in organised events are expected to attend all timetabled activities unless they have been granted specific leave of absence.
- Participants may not leave the grounds of the College except with permission and in exceptional circumstances when they will be accompanied.
- Inappropriate physical intimacy among participants is not permitted.
- Serious incidents of misbehaviour such as fighting, racial/sexual abuse, damage to property, indecent language and failure to obey instructions will normally lead to expulsion from the activity and the College.

### **Review and monitoring**

This policy and procedures will be regularly monitored and reviewed:

- In accordance with changes in legislation and guidance on the safeguarding of children and vulnerable adults or any changes within the College
- Following any issues or concerns raised about the safeguarding of children or vulnerable adults within the College
- In all other circumstances, at least annually.

## **Review of Policy**

This policy was last reviewed in May 2023. The next review date is May 2024, and this will be completed, approved, and signed off by the Director of Studies.

## **Policy Approval**

**Director's Name: Funmi Oladimeji**