

Scope

This purpose of this policy is to help the John Henry Group Training Centre to fulfil its responsibilities to protect and safeguard the welfare of children, young people, and vulnerable adults in its care. John Henry Group recognises the right of every individual to stay safe. This policy will also provide clear direction to staff and others about expected behaviour when dealing with safeguarding and child protection issues. The intention of this policy is to make explicit the commitment to the development of good practice and sound procedures. This ensures that safeguarding concerns, referrals and monitoring are handled sensitively, professionally and in ways which support the needs of all children, young people or a vulnerable adult. This policy applies to all students, staff, governors, volunteers, and visitors to John Henry Group, irrespective of age, gender, ethnicity and disability.

Responsibilities

John Henry Group takes seriously its responsibility to protect and safeguard the welfare of children, young people and vulnerable Adults. John Henry Group also recognises it is responsible for making contacts and referrals rather than making enquiries and investigating.

Section 175 of the Education Act 2002 places a statutory responsibility on the Governing Body to have policies and procedures in place that safeguard and promote the welfare of children. Part 2 of 'Keeping Children Safe in Education' Sept 2022 sets out the responsibilities of Governing Boards, including the need to remedy without delay any deficiencies or weaknesses in regard to child protection arrangements that are brought to the attention of the Directors of John Henry Group.

The Care Act 2014 encourages caregivers to take a person-centred approach when safeguarding vulnerable adults. When you follow the principles, you too place the vulnerable person's wellbeing and needs at the forefront of safeguarding processes.

Section 11 of the Children Act 2004 sets out the arrangements that the provider must make to promote the welfare and safeguarding of children, young people and vulnerable adults. 'All schools and further education institutions have a statutory duty to safeguard and promote the welfare of children. Consequently, staff play an important part in safeguarding individuals from abuse and neglect by early identification of those who may be vulnerable or at risk of harm by educating students about managing risks and improving their resilience through the curriculum.

The Provider must create and maintain a safe environment for children, young people and vulnerable adults and should manage situations where there are welfare concerns. Working Together to Safeguard Children, 2018 states that 'safeguarding children and protecting them from harm' is everyone's responsibility. Everyone who comes into contact with children and families has a role to play.

It is the responsibility of the John Henry Head of Learning and Development and Designated Safeguarding Lead to ensure the John Henry Group Training Centre Safeguarding policy is communicated to all Training Centre staff and external providers of training delivery, assessment or verification as used by the Training Centre.

Definitions

The Care Act introduced a legal duty to make enquiries about safeguarding concerns, under section 42. The safeguarding duties apply to an adult who:

- Has needs for care and support (Whether or not the local authority is meeting any of those needs) and
- Is experiencing, or at risk of, abuse or neglect and
- As a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

John Henry Group will:

Ensure there is a Designated Safeguarding Lead (DSL) and Safeguarding Team. The DSL and Safeguarding Team will have a complete safeguarding picture and will be the most appropriate individuals to advise on any safeguarding concerns. All members of safeguarding team will be trained in Safeguarding and have a refresher training every year. The Designated Safeguarding Lead will play an effective role in pursuing concerns and protecting children, young people and vulnerable adults. All staff and other adults working within John Henry Group will be trained in the procedures where they are concerned about the safety of an individual.

Ensure there are safeguarding policies and procedures in place which are reviewed annually. The DSL will provide an annual report to the Board of Directors setting out how John Henry Group has discharged its duties to students and staff. The DSL will ensure there are regular safeguarding meetings and reviewing all safeguarding related data, reports, policies, and procedures.

Through effective CPD ensure all staff can identify children, young people and vulnerable adults who may benefit from early help and their role in it. This includes identifying emerging problems, liaising with the DSL and sharing information with other professionals to support early identification and assessment.

Have a responsibility and be aware of the signs of abuse and neglect so staff can identify those who may need extra help or who are suffering, or are likely to suffer, significant harm. This will be achieved by all staff being aware of the main categories of abuse: Physical, Emotional, Sexual and Neglect. In addition, all staff should be aware that abuse, neglect, and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another. Staff should be aware that behaviour linked to the likes of drug taking, alcohol abuse, truanting and sexting put children in danger. All staff should be aware that safeguarding issues can manifest themselves via peer-on-peer abuse.

Ensure that any risks associated with children, young people or vulnerable adults offending, misusing drugs or alcohol, self-harming, Female Genital Mutilation (FGM), Child Sexual Exploitation (CSE), going missing, being vulnerable to radicalisation are known by the professionals and adults who care for them, and the information is shared with the local authority children's social care service.

Ensure all staff members are aware of the systems within John Henry Group which support safeguarding, and these should be explained to them as part of their induction. Staff understand the risks posed by adults or students who use technology, including the internet, to bully, groom, radicalise or abuse children or students. They have well-developed strategies in place to keep children, young people and vulnerable adults safe and to support them to develop their own understanding of these risks, learning how to keep themselves and others safe. Managers oversee the safe use of technology and act immediately if they are

concerned about bullying or well-being.

Ensure a record of referral is retained and there is evidence that any agreed action following a referral has been taken promptly to protect the individual from further harm.

Ensure John Henry Group practices safer recruitment by robustly checking the suitability of staff, contractors and volunteers who work with children, young people and vulnerable adults to ensure that those who are unsuitable to work with them are not employed, ensuring that all statutory requirements are adhered to. There is monitoring to prevent unsuitable people from being recruited.

Ensure all staff have access to a copy of and understand the written procedures for managing allegations of harm to a child, young person, or a vulnerable adult. Staff know how to recognise that children, young people, or vulnerable adults are capable of abusing their peers.

Training and support

Training is kept up to date through an annual refresher. The DSL will ensure that all staff members undergo safeguarding training at induction. In addition, key staff receive regular safeguarding training and updates (e.g. via email, e-bulletins, staff meetings), as required but at least annually, to provide them with relevant skills and knowledge to safeguard children, young people and vulnerable adults effectively. This will also include Prevent training, to ensure that staff have the necessary training that gives them the knowledge and confidence to identify children, young people, and vulnerable adults at risk of being drawn into terrorism, and to challenge extremist ideas which can be used to legitimise terrorism. This includes agency, associate, and temporary staff.

Professional confidentiality, records and monitoring

Confidentiality is an issue which needs to be discussed and fully understood by all those working with children, young people, and vulnerable adults particularly in the context of safeguarding. The only purpose of confidentiality in this respect is to benefit the individual. A member of staff must never guarantee confidentiality to a student, nor should they agree with a student to keep a secret. Where there is a safeguarding concern, this must be reported to the Designated Safeguarding Lead and may require further investigation by the appropriate authorities. Students can be reassured that only the people who 'need to know' will be informed, that this will be the minimum necessary and that information will not become common knowledge.

Staff will be informed of relevant information in respect of individual cases regarding safeguarding on a 'need to know' basis only. Where information is shared with appropriate staff, they must maintain the confidentiality outlined above.

Well-kept records are essential to good safeguarding practice. John Henry Group is clear about the need to record any concerns held about a student, the status of such records and when these records should be passed over to other agencies. Records are kept on the Central Safeguarding Register.

Any member of staff receiving a disclosure of abuse, or noticing signs or indicators of abuse, must make an accurate record as soon as possible, noting what was said or seen, putting the event in context, giving the date, time and location. All records will be dated, signed, and will include the action taken. Making the record should not delay referring the disclosure to the DSL or appropriate authority.

These notes are kept in a confidential file, which is separate to other files, and stored in a secure place. In

the same way, notes must be kept of any student who is being monitored for safeguarding reasons.

The DSL will have oversight of the record management policy to ensure that issues around safeguarding records are addressed appropriately.

Prevent: radicalisation and extremism

Protecting staff and students from the risk of radicalisation is part of John Henry Group' wider safeguarding duties and is similar in nature to protecting young people from other forms of harm and abuse. During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media has become a major factor in the radicalisation of young people.

As with managing other safeguarding risks, staff should be alerted to changes in young people's behaviour which could indicate that they may be in need of help or protection. Staff should use their professional judgement in identifying young people who might be at risk of radicalisation and act proportionately.

Staff will receive bi-annual Prevent training and will complete new starter E-Learning Prevent training.

Prevent

From 1 July 2015 specified authorities, including all schools and Colleges (as defined in the summary of Keeping Children Safe in Education, 2022), are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015, ('the CTSA 2015'), in the exercise of their functions, to have 'due regard to the need to prevent people from being drawn into terrorism' ("the Prevent duty"). Bodies to which the duty applies must have regard to statutory guidance issued under section 29 of the CTSA 2015 ('the Prevent guidance').

The statutory Prevent guidance summarises the requirements on further education institutes in terms of seven general themes: external speakers and events, working in partnership, risk assessment, action plans, staff training, welfare and pastoral care and IT policies.

Channel

Safeguarding staff should understand when it is appropriate to make a referral to the Channel programme. Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages.

Section 36 of the CTSA 2015 places a duty on local authorities to ensure Channel panels are in place. The panel must be chaired by the local authority and include the police for the relevant local authority area. Following a referral the panel will assess the extent to which identified individuals are vulnerable to being drawn into terrorism, and, where considered appropriate and necessary consent is obtained, arrange for support to be provided to those individuals. Section 38 of the CTSA 2015 requires partners of Channel

panels to co-operate with the panel in the carrying out of its functions and with the police in providing information about a referred individual.

Allegations against John Henry Group Staff

These should immediately be referred to (insert name of DSL) who will then inform and involve other agencies and John Henry Group Managers. This would then move into the John Henry Group Disciplinary Procedures, taking account of any current DfES guidelines ('Working Together to Safeguard Children).

Definitions of abuse:

Abuse may fall into a number of categories eg physical, emotional, neglect and sexual with the additional categories for vulnerable adults of acts of omission, psychological, financial or material, institutional or professional abuse. Someone may abuse or neglect a child or young person by inflicting harm, by failing to act to prevent harm or by failing to ensure safety and adequate care. Harm may occur intentionally or unintentionally. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger. Examples of abuse are outlined below.

These examples are by no means exhaustive.

Physical Abuse

Actual or likely physical injury to a child or young person, or failure to prevent physical injury (or suffering) to a child or young person, including intentional poisoning, suffocation and fabricated or induced illness eg:

- Multiple bruising
- A history of unexplained falls and/or minor injuries
- Finger marks
- Burns not consistent with possible explanations
- Global or specific deterioration of health without obvious cause
- Increasing immobility
- Dehydration
- Over or under use of medication
- Fractures not consistent with falls or explanation of the injury
- Unexplained loss of hair, in clumps
- Cuts not likely to be explained by self-injury

Emotional Abuse

Persistent emotional ill-treatment of a child or young person, as to cause severe and persistent adverse effects on the child's emotional development. This may involve conveying to a child or young person that they are worthless or unloved, inadequate, or valued in so far as they meet the needs of another person. It may include persistent scapegoating, name calling (racial, religious and sexual orientation), hostility, ridicule, frightening or threatening behaviour or cruelty. It may feature age or developmentally inappropriate expectations being imposed on children. It may involve causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is

involved in all types of ill-treatment of children, though it may occur alone.

Neglect or Omission

The persistent failure to meet a child or young person's basic physical and/or psychological needs, likely to result in the serious impairment of the child or young person's health or development. It may involve a parent or carer failing to provide adequate food, shelter and clothing, failing to protect a child or young person from physical harm or danger or failure to ensure access to appropriate medical care or treatment, eg

- Persistent hunger
- Loss of weight
- Poor hygiene
- Inappropriate dress
- Consistent lack of supervision for long periods, especially during activities which hold danger for them
- Constant fatigue or listlessness
- Physical problems and medical needs that are not attended to or general abandonment.

Sexual Abuse

Sexual abuse involves forcing or enticing a child, young person or vulnerable adult to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetration or non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material, watching sexual activities, or encouraging children to behave in sexually inappropriate ways eg

- Unexplained bruising around the vaginal or genital areas
- Unexplained difficulties in walking
- Reluctance of the person to be alone with an individual known to them
- Unexplained behaviour change
- Unexplained bleeding from vaginal or genital areas
- Stained or bloody underclothing
- In residential care, fear of staff offering help with undressing, bathing etc.

Psychological Abuse

This can affect young people through humiliation, insults, bullying, threats, enforced isolation, ridicule, depriving a person of due respect, dignity and affection and can demoralise the individual concerned eg:

- Strain within the relationship
- Indication that the abuser acts differently with the worker present than at other times with the vulnerable adult
- An air of silence in the home when the alleged abuser is present
- A general lack of consideration for the vulnerable adult's needs
- Refusal to allow the vulnerable adult an opinion of his or her own
- Denial of privacy in relation to their care, feelings or other aspects of their life
- A denial of access to the vulnerable adult, especially where the adult is in need of assistance, which they will consequently not receive
- Denial of freedom or movement eg locking a young person in a room or tying them to a

chair

- Alterations in the psychological state, possibly withdrawal or fear.

Financial or Material Abuse

This is likely to involve access to and misappropriation of funds, possessions or benefits of a vulnerable adult. This can include, for example, the use of money or property without the informed consent of the vulnerable adult or making transactions which they do not understand. Other examples include stealing, using pressure to obtain rights to property or a will or preventing the sale of a property which would release capital to fund care packages or a residential home placement, that otherwise will put the vulnerable adult at risk e.g.

- Situations where, despite having a pension/benefits, the vulnerable adult is without money shortly after its receipt, particularly where that person is not able to spend money without assistance
- Unexplained withdrawals from savings accounts (large and small). The victim may have no realistic idea of how much money is in the account or what is happening to their financial affairs
- The unexplained disappearance of financial documents eg building society books and bank statements
- An unexplained shortage of money, despite a seemingly adequate income.

Institutional or Professional Abuse

Institutional abuse may be defined as both abuse by a regime itself and/or by an individual(s) of that regime. On occasions, institutions may develop practices which allow the abuse of those in their care as a matter of the daily routine of the organisation. Factors that may undermine the creation of a positive, caring culture might be, for example: weak or oppressive management, poor pay and conditions, the absence of appropriate training and support for staff, a lack of policy and clear procedures and poor channels of communication.

Forced Marriage

The difference between an arranged and a forced marriage

The tradition of arranged marriages has operated very successfully within many communities and many countries for a very long time. A clear distinction must be made between a forced marriage and an arranged marriage. In arranged marriages, the families of both spouses take a leading role in arranging the marriage but the choice whether to accept the arrangement remains with the individuals. In forced marriage, at least one party does not consent to the marriage and some element of duress is involved.

Forced marriage is primarily an issue of violence against women. Most cases involve young women and girls aged between 13 and 30 years, although there is evidence to suggest that some victims are male. Forced marriage is a criminal offence; the offences can include abduction, physical violence and threatening behaviour. Sexual intercourse without consent is rape.

Domestic Abuse

The issues of children living with domestic violence is now recognised as a matter for concern in its own right by both government and key children's services agencies. The link between child physical abuse and

domestic violence is high. The impact of domestic violence and abuse on an individual child will vary according to the child's resilience and the strengths and weaknesses of their particular circumstances.

Cause for Concern Note:

Confidential: For the attention of Designated Personnel ONLY		
Refer to the Designated Safeguarding Lead		
Date:	Time: Where:	Report Written by:
Name of Complainant:	Date of Birth:	Age:
Report of Safeguarding Concern		
Important Notes		
<ul style="list-style-type: none"> • Listen carefully and stay calm / Provide reassurance. • Do not conduct interview – use open questioning. • Write down what is said. • Ask any questions normally and without pressure e.g. just to clarify factual details such as time, date, place etc. • Inform complainant that the information must be passed on and to whom the report will be forwarded. • Staff should not investigate allegations themselves. 		
NB: This report may be submitted as evidence and must be precise and factual.		
Report of Concern		

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Actions taken -

I sign below to confirm that the above report is an accurate record and agree to this information being forwarded:

Complainant's Signature:	Date:
Report Writer's Signature:	Date: