



Safeguarding and Prevent Policy 2025-2026

Policy Statement

JAG Training is fully committed to safeguarding and promoting the welfare of all learners, young people, staff and those with additional needs. We expect all staff, volunteers and partners to endorse and practise this commitment at all times.

Updated July 25
Review date: November 2026

1. Statement

Our aim is to safeguard **all** JAG Training learners, but particularly young people (those under 19) and those with identified needs in all our onsite and offsite programmes including those, such as apprentices, who are studying in the workplace. The Centre will take reasonable measures to ensure that the risks of harm to young people and vulnerable adult's welfare are minimised; and that where there are concerns about individual's welfare, the Centre takes appropriate actions to address those concerns while working to agreed local policies and procedures in partnership with local agencies.

1.1 Definitions

- **Prevention** - providing a safe environment for all learners, staff, young people and those with additional needs to learn and reach their full potential. The Centre has a robust staff recruitment system, with policies and procedures that support and promote safeguarding and creating a positive atmosphere. Our principles are in line with Equality, Diversity and Inclusion, British Values and Mental Health advice.
- **Protection** - identifying and putting in place action plans for any learner with additional needs who is suffering, or likely to suffer, significant harm, e.g., by neglect, physical injury, sexual or emotional abuse, any aspect of bullying, harassment or coercion or working / learning in a situation that is likely to cause physical, emotional or mental harm.
- **Support** - taking appropriate action to see that all young people and those with additional needs are kept safe, both at home and whilst accessing our programmes. In pursuit of these aims, all staff will ensure safeguarding is a high priority.

1.2 The Senior Management Team (SMT) role.

The SMT will ensure safeguarding is a high priority and regularly review policies and procedures. We will:

- raise awareness of issues relating to the welfare of young people and those with additional needs ensuring the promotion of a safe environment for all learners within the Centre, work placements and related environments. This will be achieved by regularly promoting and embedding safeguarding, Prevent, health and safety (including infection control) and British Value key messages in our teaching, learning and all activities including progress reviews,
- follow appropriate procedures to ensure staff are trained and supported to respond appropriately and sensitively to safeguarding and child protection concerns including Prevent. This will be achieved by monitoring staff member's continuous professional development (CPD) training records and ensuring Safeguarding / Prevent training is updated,
- identify young people and those who have additional needs and/or at risk of significant harm, including "reported missing" and provide procedures for reporting concerns. This will be achieved by linking with relevant Centre staff, and with employers, if applicable, where disclosures may be discussed,
- safeguard all staff, volunteers and partners in carrying out their duties in teaching, supervising and supporting learners at the Centre, other external facilities, in the workplace or by distance learning,
- establish clear procedures for reporting and dealing with allegations of abuse against learners or members of staff. This will include seeking timely advice from external safeguarding agencies when learners are potentially at risk of harm,
- safely recruit new staff. This will be achieved by the SMT and any staff involved in the recruitment process following legislation, policy and procedures ensuring all recruitment checks are completed.
- work to agreed local policies and procedures in full partnership with local agencies,
- plan, implement, monitor and review policies and procedures to ensure we continue to provide a safe environment for children, young people and adults at risk,
- provide suitable systems to ensure the safety of all who visit the Centre, ensuring all risks are adequately controlled and regularly reviewed including the use of contractors,
- provide environments where everyone feels valued, safe and respected and where individuals are enabled to discuss concerns and are listened to. This will be achieved by the regular promotion of the Centre and British values and embedding these across all Centre activities,
- where learners are not achieving, and it is not connected to the curriculum, this is picked up early and managed,
- consult with staff, learners and relevant bodies including local authorities, clinical commissioning groups and police in line with the National Prevent Strategy to counteract extremism

1.3 Contact details for Safeguarding Leads

Geraldine Julius (director)
12 Newmarket Green, Eltham, SE9 5ER
02037547019 or 07415094440 GJulius@jag.training

PB Clark (quality manager)
07494 399 123 PBClark@jag.training

There is a reporting form at the end of this policy and available on the staff shared drive.

2. Links to relevant legislation and guidance

2.1 Law

- Keeping Children Safe in Education rev, 2020 and 2021
- Working Together to Safeguard Children
- The Care Act 2014 Fact sheets
- Health, Safety and Welfare Act 1974
- Safeguarding Vulnerable Groups Act 2006
- The Counter-Terrorism and Security Act 2015
- Equality Act 2010
- Human Rights Act 1998 and the United Nations Convention the Rights of the Child
- GDPR guidance - Toolkit for School; Data Protection Act; GDPR for organisations
- Education and Apprenticeship Act
- Children Act 1989, 2004

2.2 British Values

Fundamental British Values underpin what it is to be a citizen in a modern and diverse Great Britain valuing our community and celebrating diversity of the UK. These values are not exclusive to Britain but are considered essential for fostering a cohesive and inclusive society where everyone feels safe, respected, and able to contribute positively.

- **Democracy:** A culture built upon freedom and equality, where everyone is aware of their rights and responsibilities. Examples include leadership and accountability, joint decision making, team meetings, the right to protest and petition, receiving and giving feedback.
- **Rule of Law:** This emphasizes the importance of laws and rules in protecting society and ensuring everyone is treated fairly. Examples include legislation, agreed ways of working, policies and procedures, how the law protects us, codes of conduct.
- **Mutual Respect and Tolerance:** This involves treating all individuals with respect, regardless of their background, beliefs, or opinions, and appreciating the diversity of society. Examples include different faiths and beliefs (and those without a faith), the importance of religion, traditions, cultural heritage and preferences, tackling stereotyping, labelling, prejudice and discrimination,
- **Individual Liberty:** This means having the freedom to make choices and express ourselves within the boundaries of the law. Examples include equality and human rights, personal development, respect and dignity, rights, choice, consent and individuality, values and principles

2.3 With these values in mind, we aim to:

- enable learners to develop their self-knowledge, self-esteem and self-confidence
- help learners become more valuable members of society who treat others with respect and tolerance regardless of background.
- promote and respect British values with mutual esteem and tolerance for everyone.
- support learners to distinguish right from wrong and to respect civil and criminal laws
- encourage learners to accept responsibility for their behaviour, show initiative, and to understand how they can contribute positively to the lives of those living and working in their locality
- enable learners to acquire a broad general knowledge of and respect for public institutions and services
- encourage further tolerance and harmony between different cultural traditions by enabling learners to acquire an appreciation and respect for their own and other cultures
- celebrate and promote equality, diversity and inclusion (see equality and diversity policy)

2.4 Extremism

Jag recognises that education is a powerful weapon against Extremism, equipping young people with the knowledge, skills and critical thinking to challenge and debate in an informed way

- The government has defined extremism in the Prevent Duty as “vocal or active opposition to fundamental British values, including democracy, the rule of the law, individual liberty and mutual respect and tolerance of different faiths and beliefs”.
- Under the Counter Terrorism and Security Act 2015, the Centre has a duty to ensure all learners, staff and volunteers are advised on how to remain safe and within the law. The Prevent Duty Section 26 does not prevent learners and staff from having political or religious views but contains details on how they use any concerns or act on them in non-extremist ways.
- Prevent is one of the 4 elements of “CONTEST,” the Governments counter-terrorism strategy. The 4 elements are PURSUE → PROTECT → PREPARE → PREVENT. It aims to stop young people becoming terrorists or supporting terrorism.

This is covered in detail in JAG’s “Preventing Extremism” policy.

3. Roles and Responsibilities

While all JAG employees have some responsibility for safeguarding, the director is responsible for monitoring and managing incidents or concerns and liaising with safeguarding agencies. All staff are obliged to regularly update their safeguarding training but the Director, quality manager and centre manager also update their ‘Safeguarding for Managers’ training. These staff member have lead responsibility in safeguarding and child protection, Prevent issues and inter-agency working and will receive refresher training at least every two years in child and adult protection. Their key duties include: lead responsibility for raising awareness with all staff on issues relating to the safeguarding and welfare of young people and adults, and the promotion of a safe environment for all those learning and working with us.

3.1 The designated lead members of staff (G Julius & PB Clark) are responsible for:

- leading and ensuring that there are effective policies, procedures and systems in place to safeguard and promote the welfare of all staff and learners especially young people, vulnerable adults and anyone with additional needs,
- ensuring that parents/carers of children, young people and adults at risk are aware of the Centre’s safeguarding policy,
- ensuring identified safeguarding procedures are followed and actions are agreed, monitored and achieved on relevant plans and reviews,
- managing and supporting Safeguarding and Prevent training of all staff,
- overseeing the referral of cases of abuse, suspected abuse to Children’s/Adult Social Care and that allegations are referred to the Local Authority’s Designated Officer in accordance with Local Safeguarding arrangements and procedures,
- providing advice and support to staff and volunteers on issues relating to safeguarding, child/adult protection and Prevent,
- maintaining accurate records of any referral, complaint or concern in respect of abuse or safeguarding (even where that concern does not lead to a referral),
- regular monitoring of concerns that are recorded and any escalation of high or severe risk concerns,
- ensuring that parents/carers of learners with additional needs are aware of the Centre’s Safeguarding and Prevent Policy,
- liaising with employers and training organisations (including work placements for young people and anyone with additional needs) in relation to safeguarding, child protection and Prevent issues to ensure that appropriate safeguards are put in place,
- ensuring that all staff and volunteers receive appropriate training in safeguarding, child protection and Prevent issues and are aware of the related policy and procedures,
- ensuring that employers provide evidence that their staff have been adequately checked, vetted and trained in safeguarding before apprentices are placed with them,
- chairing meetings to consider applications made by learners or staff, where disclosures involving “high needs” or “criminal convictions” are recorded, taking advice from social workers, the Police, Youth Offending Team and other partners,

- making themselves available to listen to learners, especially young people and those with additional needs and ensure they, their families and those involved are regularly updated of any developments,
- supporting individual cases, including attending Initial Safeguarding Reviews, Child Protection Case Conferences, internal review meetings, strategy meetings, Child in Need meetings and Multi Agency Review Meetings (MARMS), as appropriate.

4. Dealing with Disclosure of Abuse and Procedure for Reporting Concerns

All staff are provided with safeguarding training at induction and receive further safeguarding training within their first 6 months of employment. Their probation period cannot be completed until evidence of attending safeguarding training is recorded. Staff also attend refresher safeguarding training every three years. Guidelines are issued to all staff and volunteers to advise on how to handle a disclosure by a learner.

4.1 Disclosure

- When a learner discloses abuse to staff member, they must report the disclosure to an SMT member immediately (certainly on the same day). Failure to do so may result in disciplinary action.
- Information relating to actual, suspected or alleged abuse should be treated with the utmost care and confidentiality. The Director and/or Quality manager will ensure that information is shared only with those staff members who need to be aware of it. No one should be given more information than is strictly necessary to support the learner at risk.
- Any detailed information about a case will be confined to the member of staff and (if not involved in the allegations) the parents/ guardians/ carers (where appropriate), but where a referral to an external agency is to be made, the Director will advise the staff members concerned.
- The staff member reporting the allegations will be kept informed of the progress of the case on a 'need to know' basis. The allegation must not be discussed with other staff or anyone not directly involved.
- If the allegation concerns the Director and/or Quality manager, the matter should be discussed with the Local Safeguarding team following the normal procedures for Child and Adult Protection.
- The member of staff concerned should refer to the following guidance when hearing the allegation of abuse from a child, young person or vulnerable adult.

When concerns are disclosed: -

4.2 DO:

- *Stay calm, reassuring and supportive*
- *Listen and take what the learner says seriously*
- *Tell the learner that she/he is right to tell someone*
- *Let him/her know that you understand how difficult it is to talk about such experiences*
- *Arrange a place and time where you can talk privately and uninterrupted as soon as possible*
- *Explain that you will need to involve other people and why*
- *Give realistic encouragement. Let the learner know that she/he is not to blame*
- *Allow the learner to speak – unprompted. Staff may ask open question but must not lead responses.*
- *Make a written record of what is said by the learner.*
- *Follow the Centre's internal channels of communication in relation to safeguarding, child protection and Prevent, downloading the available online form (from the shared drive) if required. Good practice states that it should be handwritten, in ink, signed and dated*
- *Follow Jag Training and LA Child/Adult protection procedures*
- *Talk to someone about your feelings and seek support for yourself*

4.3 DO NOT:

- *Promise confidentiality*
- *Make promises or reassurances you cannot keep*
- *Press for details or ask leading questions which may invalidate court proceedings or impede an investigation*
- *Ask the learner to repeat the details unnecessarily*
- *React emotionally*
- *Interrupt or stop a learner during a disclosure*
- *Underestimate your role as a trusted adult*
- *Forget to make time and seek support for yourself*

Taking into account all the information available, the Director or Quality manager will decide on the next steps, which may include taking no further action. Where it is decided that further action is necessary, this may be to:

- Seek further advice from Social Services.
- Make a referral to Social Services
- Report the incident to a designated Social Worker
- Report the matter to the police if a crime is suspected

If a referral is made, this must be confirmed in writing to the appropriate agency within 24 hours.

- The director and/or Quality manager may consider that those involved require counselling. Where this is so, (counselling could be for the child/children, other learners, staff, parents or carers involved) the relevant agencies will be contacted and the necessary arrangements made.
- If a member of staff does not agree with a decision of the director and/or Quality manager that no further action is necessary, the member of staff should, in the first instance, refer these concerns back to the Director. If the Director and/or Quality manager does not recommend further action and the member of staff still has concerns, then the member of staff has the right and duty to refer the case directly to the local Social Services Child/Adult Protection Service.

4.4 Confidentiality

Any young person or adult who wishes to disclose concerns must be informed that the staff member has a professional responsibility to share the relevant information about the protection of the learner with other professionals. If a young person or adult confides in a member of staff and asks for the information to be kept secret, the member of staff has a responsibility and duty of care to share the information with the Director and/or Quality manager. This needs to be done with care and sensitivity and the young person or adult needs to be reassured that the matter will be discussed only with those people who need to know. The young person or vulnerable adult should be dealt with openly and honestly if the case is to be moved forward.

5. Procedure for dealing with an accusation against a staff member.

It is essential in all cases of suspected abuse by a member of staff that action is taken quickly and professionally. All allegations of inappropriate behaviour or poor practice by a member of staff should be addressed in accordance with the employee's contract and employment law. It may be necessary to suspend a member of staff. An investigation carried out prior to a disciplinary hearing is critical to the overall fairness of the procedure being followed and any disciplinary action taken. It is an important part of any disciplinary process, not just for establishing whether or not there is sufficient evidence to justify proceeding to a disciplinary hearing but to ensure the employee understands the allegations made against them. The disciplinary investigation, if deemed necessary, will be conducted in accordance with the ACAS Code of Conduct. We will,

5.1 Consider whether suspension is necessary. Suspension may be considered at any stage of the investigation. It is not an indicator of guilt and is not automatic. Suspension is a neutral act to remove the staff member from a situation under investigation and will initially be on full pay. Consideration may be given to alternatives: e.g., paid leave of absence; agreement to refrain from attending work; change of, or withdrawal from, specified duties. Suspension should only occur for a good reason. For example,

- where a learner is at risk,
- where necessary for the good and efficient conduct of the investigation,
- where the allegations are sufficiently serious to justify dismissal on the grounds of gross misconduct.

If the Director and/or Quality manager consider that suspension is necessary, the member of staff will be informed and a written confirmation of the suspension, with reasons, will be sent ideally within one working day. The suspended member of staff will be given appropriate support and be provided with information on progress and developments in the case at regular intervals. The suspension will remain under regular review in accordance with the ACAS Code of Practice.

5.2 Ensure the investigating officer is appropriate. The person charged with investigating the allegations is usually the employee's line manager but this may not be appropriate where it is the line manager who has made the complaint against the employee or is otherwise a witness in the investigation. In such circumstances, JAG will appoint an alternative person to conduct the investigation. In either case, the

investigating officer will be a neutral person and different to the manager who will chair any disciplinary hearing to avoid allegations that the hearing outcome has been pre-judged.

- 5.3 Ensure a timely, fair investigation is carried out.** The employee may have a plausible explanation for what they were doing which could mean that a disciplinary hearing is not required, and this will not be discovered unless an investigation is undertaken. It is also important this undertaken quickly.
- 5.4 Ensure the investigation is reasonable and proportionate.** The type of investigation required will depend on the circumstances, with allegations of serious misconduct requiring more detailed investigation. The extent of the investigation must be reasonable in the circumstances to ensure that the relevant facts are established. This allows JAG (and the accuser) to submit their case to the employee so that the employee understands it. If the allegations relate to ignoring safeguarding concerns, a higher standard of investigation is expected. This should include pursuing lines of enquiry which may prove the employee's innocence, as well as those which may establish their guilt. The member of staff should be given the opportunity to consider any information that will be presented at the meeting and prepare a response.
- 5.5 Keep detailed notes.** Detailed notes of all witness meetings conducted during the investigation process, including those with the accused employee, will be made and kept. Ideally the notes should be signed by the witness to confirm they are an accurate reflection of what was discussed.
- 5.6 Remind those involved of their duty of confidentiality.** Employers must be mindful of the need to maintain confidentiality throughout the investigation process. The investigating officer will explain to witnesses that they should not discuss the investigation with colleagues or third parties and that they need to keep the facts of the investigation confidential.
- 5.7 Consider if the employee should be allowed a companion.** There is no statutory right for an employee to be accompanied at an investigation meeting. However, JAG has a statutory duty to make reasonable adjustments where a disabled employee is placed at a disadvantage and a moral duty to support the employee during an investigation. It is reasonable to allow an employee to be accompanied and to change the location or arrangements so the employee and the accuser are not disadvantaged. The member of staff should be advised to seek the advice and/or assistance of his/her trade union and should be informed that they have the right to be accompanied by a work colleague or trade union representative. *Most investigations will be by 'phone and online. JAG will adhere to the correct remote protocols i.e., not recording meetings that are sensitive or for which permission has not been gained.*
- 5.8 Remember it is not a disciplinary hearing.** The investigation is purely the means by which evidence is obtained to establish the facts. It is not a disciplinary hearing. If the employee admits their guilt during the investigation process the employer must still invite the employee to a disciplinary hearing at which they can present their case and any mitigating factors before any appropriate further (disciplinary) action is taken.
- 5.9 Not breach the implied duty of trust and confidence.** JAG will not use the investigation as 'a fishing expedition' to obtain information about the employee by whatever means. Nor will it be used as an excuse for removing a staff member based on non-related information. Such behaviour would undermine the implied duty of trust and confidence between the employer and the employee.
- 5.10 Recommend next steps.** At the end of the investigation, the investigating officer will review the evidence collated and make a recommendation based on what was found. The investigating officer will be encouraged and supported to document their thought process and the key evidence supporting their decision in case they are required to give evidence on this at a subsequent tribunal hearing. It may be that there is insufficient evidence to justify taking any further action and, where this is the case, the employee will be informed. If the investigating manager believes there is sufficient evidence to proceed, the employee will be asked to attend a disciplinary hearing. The learner or learners making the allegation, and/or their parents/carers should be informed of the outcome of the investigation and proceedings. This should occur prior to the return to work of the member of staff (if suspended).

6. Allegations without Foundation

False allegations may be indicative of abuse elsewhere. A record should be kept, and consideration given to a referral under local safeguarding procedures so that other agencies may act on the information.

- Inform the parents / carers of those involved that the allegation has been made and of the outcome. Where the allegation was made by a learner other than the alleged victim, consideration to be given to informing the parents/carers of that learner.
- Prepare a report outlining the allegation and giving reasons for the conclusion that it had no foundation and confirming that the above action had been taken.
- In the event that an allegation is shown to have been deliberately invented or malicious, the Director should consider whether any disciplinary action is appropriate against the person who made it.
- Consideration to be given to offering counselling and support to rebuild the staff member's confidence.

JAG will consider broader disclosure of the outcome of any investigation e.g., if the matter is of general importance, has become common knowledge or is the subject of gossip. There is a need to provide accurate details for public information.

7 Recording and monitoring

7.1 Records

- It is important that documents relating to an investigation are retained in a secure place, together with a written record of the outcome and, if disciplinary action is taken, details retained on the staff member's personal file. Where the allegation is found to be without foundation, a record of the allegation, investigation and outcome should be retained.
- Appropriate procedures will be followed in notifying the Disclosure and Barring Service (DBS) and the Local Safeguarding team of staff or volunteers who have been dismissed or removed because of child/adult protection issues. If a member of staff is dismissed or resigns before the disciplinary process is completed, he/she will be informed about the JAG's statutory duty to notify DBS.

7.2 Monitoring Effectiveness

- Where an allegation has been made against a member of staff, the staff member with lead responsibility should, at the conclusion of the investigation and any disciplinary procedures, consider whether there are any matters arising from it that could lead to the improvement of the Centre's procedures and/or policies.
- JAG's Safeguarding Policy and procedure is reviewed annually, and its provisions monitored by the Director, quality manager and centre manager. The review process includes analysis of data, consultation with, and feedback from, learners, volunteers, staff and other stakeholders to determine the impact of the policy and any action required.

8. Safer Recruitment Policy Statement

JAG Training has a responsibility to ensure safe recruitment and employment practices to safeguard and promote the welfare of young people and adults with additional needs receiving education and training through the Centre or in the workplace. All staff and volunteers are checked appropriately before employment, including a Disclosure and Barring Service (DBS) check.

In accordance with legislation and guidance, the Centre has a Safer Recruitment Procedures together with separate guidance in respect of recruitment of ex-offenders and the DBS system. All recruiting staff will have completed Safer Recruitment Training. The Centre's recruitment and selection procedures include the following requirements:

- Applicants are required to complete an application form and sign to declare the information they have provided is true.
- Evidence of qualifications and identity is obtained, including eligibility to work in the UK.
- Employment/educational references are required for successful candidates.
- The successful candidate's application form is reviewed by the Director and quality manager and any gaps in employment or other missing information is checked.
- Enhanced DBS disclosures are undertaken for all employees and are treated confidentially.
- Where a DBS disclosure has not been received before a candidate's start date, then a Risk Assessment will be undertaken to ensure that it is apt and safe for the candidate to start work.

9. Mental ill health

Poor Mental health can be a result of experiencing abuse or neglect, but it can also make someone more vulnerable to being abused. Recognising the role that we play in identifying and supporting mental health is a key aspect of the *Government's Green Paper, Transforming Children and Young People's Mental Health Provision (2017)*. Mental health refers to emotional, psychological and social wellbeing. Our mental health influences what we think, and how we feel and behave, including how we react in certain situations and how we manage stress or conflict. Whilst not all mental health issues are safeguarding risks, it is important to raise any concerns about a learner's mental health so that appropriate intervention can be put in place. There are many issues that can be supported in an educational setting.

Mental health issues might include:

- Anxiety and panic attacks
- Depression
- Obsessive compulsive disorder (OCD)
- Eating disorders
- Post-traumatic stress disorder (PTSD)
- Suicidal ideation
- Detachment/abandonment trauma
- Personality disorder
- Substance misuse ('self-medicating').

Whilst there are many signs that indicate mental health issues, here are a few warning signs:

- Reluctance to join or engage with a group
- Having low mood or appearing listless
- Expressing feelings of helplessness, worthlessness or hopelessness
- Dependency on alcohol or drugs to feel better
- Showing signs of confusion or forgetfulness
- Being unduly worried or very easily upset
- Difficulties managing frustration and anger
- Wanting to harm themselves or others.

10. Abuse of trust

This occurs when an adult in a position of authority (such as a teacher, doctor, social worker or police officer) engages in inappropriate activity with a person in their care. It also occurs when a person in authority exerts pressure on an adult to engage in a relationship that they do not want, by making them feel they will be in some way disadvantaged or penalised if they do not. For example, an adult learner fearing lower grades if they don't engage in inappropriate or controlled activity with a teacher when asked.

10.1 KEEPING LEARNERS SAFE: Staff behaviours deemed inappropriate. *Staff must not,*

- Drink Alcohol in work time or come to work smelling of alcohol
- Engage in any illegal activity with a learner
- Have any form of sexual relationship with a learner
- Accept money or gifts from a learner
- Lend money to learners
- Give learners lifts home if alone
- Give personal details such as home address, private telephone or mobile number
- Meet a learner at their own home
- Invite or take a learner home
- Arrange to meet a learner outside of work hours or on non-centre business
- Take responsibility for a learner's personal property
- Be alone / out of eyesight with a young (16 -19) learner
- Promise to keep any information they disclose confidential
- Have physical contact, beyond a professional handshake unless for the purpose of professional assistance such as a health emergency
- Talk about a learner or other staff members in a public space where it can be overheard

- Talk about a learner's private business in front of other learners
- Be disparaging or use offensive language to, or about, a learner
- Discuss a learner with another member of staff other than the line manager or other staff who have direct responsibility for that learner, without their consent
- Give out any information over the telephone about learners, without their consent
- Send e-mails or other communication containing a learner's name or identifying information without their consent
- Store data on learners in an unprotected filing system
- Dispose of learner data in an unsecured manner
- Collude with learners to 'pass' assessments or tests
- Record learners during online sessions without express and overt permission
- Act inappropriately during on-line sessions (fetching food and drinks, keeping learners waiting, swearing, making inapt or salacious comments, have own children or family members present).

11. Safeguarding and AI

Like many training organisations Jag is reviewing how to deal with the emergence of generative AI and its impact on our ways of working and adapting or creating new policies to address its use. It is a challenging place to be, given that governments and major corporations struggle to keep up with changing technology.

- 11.1 There has been a rapid increase in the number of "deep fake" images on the web, (growing from roughly 14,000 in 2019 to 145,000 in 2022) and it's rising. *[A deepfake is an image, video, audio file, or GIF that has been manipulated by a computer to use someone's face, body or voice artificially. This could be done with or without the subject's consent].*
- 11.2 UNICEF found that one in five girls and one in thirteen boys globally have been sexually exploited or abused by the age of 18, with technology featuring in almost all cases.
- 11.3 The majority (96%) of "deep fake" non-consensual pornographic images are targeted at young women.
- 11.4 Student-generated images are becoming increasingly common in cases of peer-on-peer harm

12. Response to AI concerns

Jag is aware of its responsibilities to ensure the safety of its learners while encouraging the use of technological advances. We will;

- 12.1 Add Generative AI as a topic in safeguarding training to raise staff awareness of emerging risks and discuss with staff how to manage incidents
- 12.2 Clarify that we respond to all forms of harm and abuse between learners, irrespective of where the harm takes place
- 12.3 Ensure learners understand what they can do when they receive an inappropriate image or video of someone else
- 12.4 Support the removal of inappropriate or harmful content from the online space, such as Without My Consent and, for abusive, explicit or illegal online content, ensure the police are informed

TYPES AND POSSIBLE SIGNS OF CHILD ABUSE (All learners under 19 are considered children)

It is important to remember that lists such as the one below are neither definitive nor exhaustive. The information should be used in the context of the child or young person's whole situation and in combination with a range of other information related to them and their circumstances. It is acknowledged that children and young people missing from education or home may have Safeguarding concerns. Our Safeguarding procedures includes reporting missing learners and working with appropriate external agencies. Attendance at lessons and the workplace where applicable is regularly monitored and concerns recorded. There can be an overlap between all the different forms of child abuse which can co-exist.

Types	Meaning	Signs/Symptoms – possible indicators
Physical Abuse	Physical abuse causes harm to a child's person. It may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning or suffocating. It may be done deliberately or recklessly or be the result of a deliberate failure to prevent injury occurring. It can also occur when a parent or carer feigns the symptoms of, or deliberately causes ill health to, a child they are looking after. <i>(When considering the possibility of non-accidental injury, it is important to remember that the injuries may have occurred for other reasons, e.g. genuine accidents or medical disorders).</i>	Unexplained injuries or burns, particularly if they are recurrent. Parental refusal to discuss, or inconsistent explanations offered, or improbable excuses given to explain injuries. Refusal to discuss injuries. Untreated injuries, or delay in reporting them. Excessive physical punishment. Body, especially limbs kept covered in hot weather. Fear of returning home or of parents being contacted. Aggression towards others. Running away.
Neglect	Neglect is the persistent or severe failure to meet a child or young person's basic physical and/or psychological needs, likely to result in serious impairment of the child's health or development. It may involve a failure to provide adequate food, clothing or shelter, failing to protect a child from physical harm or danger, or failure to ensure access to appropriate medical care or treatment. It may also involve neglect of, or inadequate response to, a child's basic emotional needs.	Constant hunger / tiredness. Poor personal hygiene. Poor state of clothing. Frequent lateness and/or unexplained non-attendance at Centre or work setting. Untreated medical problems. Low self-esteem. Poor peer relationships. Stealing. Non-organic failure to thrive
Emotional Abuse	Emotional abuse occurs where there is persistent emotional ill treatment or rejection such as to cause serious and adverse effects on the child's or young person's behaviour and emotional development, resulting in low self-worth. It may involve conveying to children that they are worthless or unloved, or valued only in so far as they meet the needs of another person. It may involve ridiculing them or making fun of the way they speak. 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 present in all forms of abuse.	Low self-esteem. Continual self-deprecation. Sudden speech disorder. Significant decline in concentration. Socio-emotional immaturity. Neurotic' behaviour (e.g. rocking, head banging). Self-mutilation. Drug or solvent abuse. Eating problems. Compulsive stealing. Extremes of passivity or aggression. Indiscriminate friendliness. Running away

Types	Meaning	Signs/Symptoms – possible indicators
Sexual Abuse	Sexual abuse involves a child or young person being forced or coerced into participating in or watching sexual activity. It is not necessary for the child to be aware that the activity is sexual, and the apparent consent of the child is irrelevant. The acts may involve physical contact including penetrative or non-penetrative acts, kissing, rubbing, and masturbation, touching under or over clothes. They may involve non-contact activities such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways. Not all children are able to tell parents that they have been assaulted. Changes in behaviour may be a signal that something has happened. These are general indicators that a child may be troubled though not necessarily about a sexual assault. The child may have some of these problems or none at all. It is the combination, frequency and duration of signs that act as an alert to a problem. Note all changes to usual behaviour. Remember, with sexual assault there may well be no physical or behavioural signs.	Lack of trust in adults or over-familiarity with adults. Withdrawal from friends / peers. Fear of a particular individual. Social isolation – withdrawal or introversion. Sleep disturbance (nightmares, irrational fears). Reluctance or refusal to participate in physical activity or to change clothes for physical activities. Fear of medical examinations. Developmental regression. Poor peer relations. Stealing. Fear of bathrooms, showers, closed doors. Running away from home. Girls taking over the mothering role. Low self-esteem. Drug, alcohol or solvent abuse. Psychosomatic factors, e.g. recurrent abdominal pain or headache. Sleeplessness, fear of the dark. Anxiety/depression. Eating disorder, e.g. anorexia nervosa or bulimia. Soiling or wetting in children who have been trained. Self-mutilation/suicide attempts. Drug or alcohol abuse Display of sexual knowledge beyond the child's years. Unusual interest in the genitals of adults or children or animals. Expressing affection in inappropriate ways, e.g. 'French kissing'. Abnormal sexualised drawing. Over-sexualised behaviour. Compulsive masturbation. Sexual promiscuity. Bruises, scratches, bite marks on top of the thighs or genital areas. Itching, soreness, discharge, unexplained bleeding from the rectum, vagina or penis. Pain on passing urine or recurrent urinary infection. Stained underwear. Unusual genital odour. Discomfort or difficulty in walking or sitting. Pregnancy – particularly when reluctant to name father. Sexually transmitted diseases.
Child Sexual Exploitation	The list of indicators is not exhaustive or definitive, but it does highlight common signs, which can assist professionals in identifying young people who may be victims of sexual exploitation.	Underage sexual activity. Inappropriate sexual or sexualised behaviour. Sexually risky behaviour, 'swapping' Repeat sexually transmitted infections. In girls, repeat pregnancy, abortions, miscarriage. Receiving unexplained gifts or gifts from unknown sources. Having multiple mobile phones and worrying about losing mobile contact. Having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs). Changes in the way they dress. Going to hotels or other unusual locations to meet friends. Seen at known places of concern. Moving around the country, appearing in new towns or cities, not knowing where they are. Getting in/out of different cars driven by unknown adults. Having older "friends". Involved in abusive relationships, intimidated and fearful of certain people or situations. Hanging out with groups of older people, or anti-social groups, or with other vulnerable peers. Associating with other young people involved in sexual exploitation. Recruiting other young people to exploitative situations. Truancy, exclusion, disengagement with school, opting out of education altogether. Unexplained changes in behaviour or personality (chaotic, aggressive, sexual). Mood swings, volatile behaviour, emotional distress. Self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders. Drug or alcohol misuse. Getting involved in crime. Police involvement, police records. Involved in gangs, gang fights, gang membership. Injuries from physical assault, physical restraint, sexual assault.

Types	Meaning	Signs/Symptoms – possible indicators
Grooming	Grooming is when someone builds a relationship, trust and emotional connection with a child or young person, so they can manipulate, exploit, traffic and abuse them. Children and young people can be groomed online or by a stranger or someone they know. Anybody can be a groomer, no matter their age, sex or race. Grooming can take place over weeks or years. Groomers may build a relationship with the young person's family or friends to make them seem trustworthy or authoritative. When a child is groomed online, groomers may hide who they are, by sending images of other people. Sometimes this'll be of someone younger to gain the trust of a "peer". They might target one child or contact lots of children very quickly and wait for them to respond. It's important to remember that children and young people may not understand they've been groomed. They may have complicated feelings, like loyalty, admiration, love, as well as fear, distress and confusion. www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/grooming	. A groomer often spends time learning about a young person's interests and use this to build a relationship with them. Children can be groomed online through social media networks, text messages and messaging apps, such as Whatsapp, emails, texting, voice and video chats in forums, games and apps. It can be difficult to tell if a child is being groomed – the signs aren't always obvious and may be hidden. Older children might behave in a way that seems to be "normal" teenage behaviour, masking underlying problems. Some of the signs include: • being secretive about how they're spending their time, including when online • having an older boyfriend or girlfriend • having money or new things like mobile phones that they can't or won't explain • underage drinking or drug taking • spending more or less time online or on their devices • being upset, withdrawn or distressed • sexualised behaviour, language or an understanding of sex that's not appropriate for their age • spending more time away from home or going missing for periods of time.
Female Genital Mutilation (FGM)	This involves procedures that intentionally alter/injure the female genital organs for non-medical reasons. There are 4 types of procedure: <i>Type 1 ~ Clitoridectomy – partial/total removal of clitoris</i> <i>Type 2 ~ Excision – partial/total removal of clitoris and labia minora</i> <i>Type 3 ~ Infibulation - entrance to vagina is narrowed by repositioning the inner/outer labia</i> <i>Type 4 ~ all other procedures that may include: pricking, piercing, incising, cauterising and scraping the genital area.</i> It is carried out in the belief that FGM brings status/respect to the girl and social acceptance for marriage. It preserves a girl's virginity and upholds family honour. It may be part of being a woman and a rite of passage. It 'Cleanses and purifies the girl' and helps girls remain 'clean/hygienic'. It gives a sense of belonging to the community. It fulfils a religious requirement and perpetuates a custom/tradition. Is "cosmetically desirable" and mistakenly believed to make childbirth easier. FGM is internationally recognised as a violation of human rights of girls and women. It is illegal in most countries, including the UK.	It is essential that staff are aware of FGM practices and the need to look for signs, symptoms and other indicators of FGM. Circumstances that may indicate it include: Young person talking about getting ready for a special ceremony. Family taking a long trip abroad. Young person's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leon, Egypt, Nigeria, Eritrea as well as non-African communities including Yemen, Afghan, Kurdistan, Indonesia and Pakistan). Knowledge that the young person's sibling has undergone FGM. Young person talks about going abroad to be 'cut' or to be prepared for marriage. Signs that may indicate a Young Person has undergone FGM: Prolonged absence from the Centre or work placement and other activities. Behaviour changes on return from a holiday abroad, such as being withdrawn and appearing subdued. Bladder or menstrual problems. Repeated urinal tract infection Finding it difficult to sit still and looking uncomfortable. Complaining about pain between the legs. Mentioning something somebody did to them that they are not allowed to talk about. Secretive behaviour, including isolating themselves from the group. Reluctance to take part in physical activity. Disclosure. The 'One Chance' rule: As with Forced Marriage, there is the 'One Chance' rule. It is essential that settings take action without delay.

Types	Meaning	Further explanation
Forced marriage (FM)	This is an entirely separate issue from arranged marriage. It is a human rights abuse and falls within the Crown Prosecution Service definition of domestic violence. Young men and women can be at risk in affected ethnic groups. Whistle-blowing may come from younger siblings. Other indicators may be detected by changes in adolescent behaviours..	N.B. Never attempt to intervene directly or through a third party. This must be handled by professionals
Radicalisation	NB – THIS IS THE FOCUS OF PREVENT TRAINING. All staff are obliged to acquaint themselves with it and discuss it with learners regularly. Forces that may contribute to vulnerability: • Rejected by peer, faith or social group/family. • Pressure from persons linked to extremism. • Victim or witness to race or religious hate crime. • Conflict with family over religious beliefs/lifestyle/politics. • Identify confusion. • Recent religious conversion.	Watch for • change in behaviour or appearance due to new influences. • Under-achievement. • Possession of literature related to extreme views. • Experience of poverty, disadvantage or social exclusion. • Extremist influences. • A series of traumatic events – global, national or personal.
Knife Crime	Knife crime' is simply any crime that involves a knife. This includes: • carrying a knife or trying to buy one if under 18 • threatening someone with a knife • carrying a knife that is banned • a murder where the victim was stabbed with a knife • a robbery or burglary where the thieves carried a knife as a weapon General advice to young people on staying safe and knife aware includes: • be aware of what's going on around you • don't display valuables, mobile or flash money about • always plan your journey • If withdrawing money from a cash machine, look around and check the machine before using it. Cover your hand when you're entering your personal identification number (PIN).	Some young people say that they carry a knife for protection or to make them feel safer, even though they wouldn't think of using it. However, research has shown that they are more likely to be a victim of crime if carrying a knife. Some teens have been injured or killed by someone else using the knife they were carrying. Where a young person is unwillingly carrying a knife and wants to get rid of it safely and anonymously, they should be encouraged to talk with an adult they trust or call Crimestoppers on 0800 555 111 (They never ask for a name or try to trace the number). During an amnesty, a knife can be handed in without having to answer police questions.
Hate crime / discrimination	Hate incidents and hate crime are acts of violence or hostility directed at people because of who they are or who someone thinks they are. For example, people have been verbally abused by someone in the street because they are disabled or because someone thought they were gay. All hate incidents should be reported it to the police. Hate incidents can take many forms. • verbal abuse like name-calling and offensive jokes • harassment • bullying or intimidation by children, adults, neighbours or strangers • physical attacks such as hitting, punching, pushing, spitting • threats of violence	All police forces record hate incidents based on five personal characteristics: disability, race, religion, transgender identity, sexual orientation. Some police forces also record hate incidents based on other personal characteristics such as age. People may need support to go to the police as the incident will be upsetting and 'personal'.

	- hoax calls, abusive phone or text messages, hate mail - online abuse for example on Facebook or Twitter - displaying or circulating discriminatory literature or posters - harm or damage to things such as your home, pet, vehicle - graffiti - arson - malicious complaints for example over parking, smells or noise. Examples of hate crimes include: - murder, assaults, sexual assault - burglary, theft, fraud, criminal damage - harassment, causing harassment, alarm or distress (Public Order Act 1986). - hate mail (Malicious Communications Act 1988)	More recently, the rise in 'Trolling'. The Urban Dictionary describes this: Trolling relates to the internet and is the deliberate act (by a Troll), of making random, unsolicited and/or controversial comments on various internet forums with the intent to provoke an emotional reaction from unsuspecting readers to engage in a fight or argument. Analogous to the fishing technique of "trolling", where colourful lures are pulled behind a boat, often with multiple fishing lines, in large bodies of water. The trolling lures attract unsuspecting fish that "take the bait". Unsuspecting internet victims, once hooked, are reeled in for the catch before they realise they have been duped. Trolling often involves giving victims malicious instructions, under the guise of help. It can then open the door to cyber-bullying.
--	---	--

Types of Harm to Vulnerable young people and Vulnerable Adults

Types of Abuse	Meaning	Signs/Symptoms – possible indicators
Emotional / Psychological	Action or inaction by others that causes mental anguish	Inflexible regimes and lack of choice. Mocking, coercing, denying privacy, and threatening behaviour, bullying, intimidation, harassment, deliberate isolation, deprivation.
Financial	Involves the misuse of money, valuables and / or property	Unauthorised withdrawals from vulnerable adult's bank account, theft, fraud, exploitation, pressure in connection with wills or inheritance.
Physical	Any physical contact that results in discomfort, pain or injury	Hitting, slapping, pushing, shaking, bruising, failing to treat sores or wounds, under or overuse of medication, unprescribed or inappropriate medication, use of restraint or inappropriate restraint, inappropriate sanctions.
Sexual	Coercion or force to take part in sexual acts	Inappropriate touching. Causing bruising or injury to the anal, genital or abdominal area. Transmission of STD.
Neglect	Failure to identify and/or meet care needs	Untreated weight loss, failing to administer reasonable care resulting in pressure sores or uncharacteristic problems with continence. Poor hygiene, soiled clothes not changed, insufficient food or drink, ignoring requests, unmet social or care needs.
Verbal	Any remark or comment by others that causes distress	Demeaning, disrespectful, humiliating, racist, sexist or sarcastic comments, excessive or unwanted familiarity, shouting, swearing, name-calling.

In the last few years, there has been greater concentration on three further recognised types of abuse

Type of Abuse	Meaning	Signs/Symptoms – possible indicators
Coercive Control (Domestic violence)	Coercive control is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim. This controlling behaviour is designed to make a person dependent by isolating them from support, exploiting them, depriving them of independence and regulating their everyday behaviour. Coercive control creates a sense of fear that pervades all elements of a victim's life. It works to limit their human rights by depriving them of their liberty and reducing their ability for action. It has been likened to being taken hostage. Because the victim becomes captive in an unreal world created by the abuser, entrapped in confusion, contradiction and fear.	• Being isolated from friends and family • Having lies and stories told about their MH and / or ability to cope – often told to children to reinforce “bad parent” belief. • Facing threats against children and pets • Being deprived of basic needs such as food, toiletries (etc.) • Not being permitted to go out to work • Having time (such as shopping) monitored • Being monitored via online communication tools or spyware and having passwords changed • Control over every aspects of everyday life, such as where they go, who they see, what they wear, what they eat and when & where they sleep • Being deprived of access to support services, including medical attention • Being repeatedly put down, called names and made to feel worthless • Being accused of seeing other – jealousy • Having sexual relationship controlled – no say. • Gaslighting so that the victim questions their own memory • Being humiliated, degraded and dehumanised • Finances being withheld or heavily controlled • Being threatened or intimidated • Having traditional gender roles reinforced
Peer to Peer abuse	Peer-on-peer/child on child abuse is usually motivated by perceived differences. It can result in significant and traumatic isolation, intimidation or violence to the victim. Children or young people who harm others may have additional or complex needs e.g. significant disruption in their own lives, exposure to domestic abuse or witnessing or suffering abuse, educational under-achievement, being involved in crime. It should be recognised that peer abuse is harmful to both the perpetrator (who is a child) and the victim. www.safeguarding.network/content/safeguarding-resources/peer-peer-abuse/	Types of peer-on-peer abuse • Domestic violence • Sexual harassment and violence • Youth violence and criminal activity • Bullying, including cyber bullying • Sexual exploitation • Relationship coercion/abuse • Sexual harassment • Financial abuse. Possible signs of peer-on-peer abuse include: • Refusing/reluctant to attend education • Physical injuries • Withdrawn, afraid, nervous and/or anxious, particularly in certain company • Having no money for lunch/travel • Poor mental health.

Type of Abuse	Meaning	Signs/Symptoms – possible indicators
Modern slavery	Modern slavery takes many forms. The most common are: • Human trafficking. The use of violence, threats or coercion to transport, recruit or harbour people in order to exploit them for purposes such as forced prostitution, labour, criminality, marriage or organ removal • Forced labour. Any work or services people are forced to do against their will, usually under threat of punishment • Debt bondage/bonded labour. The world's most widespread form of slavery. People trapped in poverty borrow money and are forced to work to pay off the debt, losing control over both their employment conditions and the debt • Descent-based slavery (where people are born into slavery). A very old form of slavery, where people are treated as property, and their "slave" status has been passed down the maternal line. • Child slavery. When a child is exploited for someone else's gain. This can include child trafficking, child soldiers, child marriage and child domestic slavery • Forced and early marriage. When someone is married against their will and cannot leave. Most child marriages can be considered slavery (see separate entry above) • Domestic servitude. Domestic work and domestic servitude are not always slavery, and when properly regulated can be an important source of income for many people. However, when someone is working in another person's home, they may be particularly vulnerable to abuses, exploitation, and slavery, as they might be hidden from sight and lack legal protection. Human trafficking can include, but does not necessarily require, movement. At the core is the traffickers' aim to exploit and enslave their victims and the many coercive and deceptive practices they use to do so.	Signs to look for. Someone in slavery might: • Appear to be under the control of someone else and reluctant to interact with others • Have few personal belongings, wear the same clothes every day or wear unsuitable clothes for work • Not be able to move around freely, and they may not have access to personal identification • Be reluctant to talk to strangers or officials including police officers or health workers • Appear frightened or withdrawn, or show signs of physical or psychological abuse • Be dropped off and collected for work always in the same way, especially at unusual times – very early or late at night www.antislavery.org

All Staff need to be aware of the range of safeguarding issues and are obliged to report and support Jag Training in any investigation or referral.

Safeguarding Referral form (also available on staff drive)

1. Completed By			
Name of person completing this referral		Date & Time:	
2. Learner Details			
Learner name:		Date of Birth:	
Course		Age at time of referral:	
Borough:		Ethnicity:	
Learning disability or difficulty? If yes, please give details:		Social services, police or external agencies involved? If yes, please give details:	
3. Outline of Concern			
Outline of concern or incident:			
Actions taken:			
Contact details of witnesses or other people involved where possible:			
Signature		Date	

Once completed, this form should be emailed to Gjulius@Jag.training or PBClark@jag.training. The contents of this form must remain confidential and should not be discussed with any members of staff, learners or personal acquaintances other than the Designated Safeguarding Team.