



Safeguarding Policy

2016/17



Safeguarding Policy

I confirm that I have received, read and understand and agree to abide by the JTL Safeguarding Policy.

.....
Signature

.....
Date

.....
Print Full Name

.....
Team/Department

Please return this page to the Human Resources Department and retain the rest of this document for your information.

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Policy Statement

All young people (children) and vulnerable adults have the right to protection, to be listened to and to have their opinions heard. JTL is committed to ensuring all apprentices on its scheme have the best opportunity to train and work in an informed and appropriate environment.

JTL will ensure that the rights of young people (children) and vulnerable adults are respected regardless of race, gender, disability, religion, sexual orientation, family status, age and social background.

This Policy is implemented in conjunction with JTL's Equality and Diversity (JTL701), Bullying and Harassment (JTL727) and Health and Safety (JTL803) Policies.

Roles and Responsibilities

All JTL employees and workers contracted by JTL, who have primary contact for supporting and/or managing provision to an individual or individuals in their work and/or learning environment, and those who have secondary contact, will be responsible for implementation of this Policy.

All JTL employees and workers will abide by current UK legislation and follow procedures as set out in this Policy.

It is not the responsibility of JTL employees to decide or diagnose whether abuse or harm has taken place; however, it is their responsibility to report any concerns, no matter how minor, regarding abuse or harm to JTL's Safeguarding Officer.

Reporting and Recording Procedure

All JTL employees and workers have a duty to report any concerns they may have that a young person (child) or vulnerable adult may be at risk of harm or abuse, even **if the young person (child) or vulnerable adult has asked for the incident to be kept confidential between themselves and the member of staff.**

Employees are encouraged to report:

- if abuse or harm is suspected;
- if abuse or harm is witnessed;
- when an allegation of abuse or harm is made;
- when a young person (child) or vulnerable adult discloses abuse or harm.

JTL reporting procedures (all records will be kept confidential):

1. Any suspected abuse or harm must be reported to JTL's Safeguarding Officer who, if appropriate, will refer and liaise with all relevant parties.
2. Any disclosure or allegation must be recorded using the incident reporting facility on the company's internal management system.
3. JTL's Safeguarding Officer will notify (if appropriate) the Assistant Manager or Regional Business Manager of the incident.
4. Individuals who report the allegation, or make the disclosure, are required to keep the matter confidential and only discuss it with JTL's Safeguarding Officer or designated investigators and not the alleged victim/accused or any other members of staff.
5. If the allegation is reported by a sub-contracted Training Centre (College), the person who has designated safeguarding duties at the Training Centre will liaise with JTL's Safeguarding Officer and any other relevant parties.
6. Staff based at JTL Training Centres must inform JTL's Safeguarding Officer of any incidents immediately.
7. If an allegation is reported by a JTL Training Centre, the Centre Manager will liaise with JTL's Safeguarding Officer. Information regarding the incident will be limited to staff responsible for teaching the learner.

JTL's Safeguarding Officer will keep all relevant parties informed of the outcome if/as appropriate (See Figure 1 on page 10 for flow chart).

JTL will support the young person (child) and/or vulnerable adult at all times and ensure that they are signposted to the most appropriate organisation for guidance, information and counselling services. The young person (child) and/or vulnerable adult will be treated with dignity throughout this entire process.

Information Sharing

It is important to note that, when any suspicions or allegations of harm or abuse have been reported to JTL's Safeguarding Officer, the information obtained may be shared with outside agencies to ensure the safety and welfare of the young person (child) or vulnerable adult, and also to provide the most appropriate care or services needed to protect the individual who may be at risk of harm or abuse.

Storage of Information

Information recorded during any investigation/discussions etc must be kept confidential at all times by JTL's Safeguarding Officer. After a case has been closed, records will be held separately in a locked cabinet only accessible by JTL's Safeguarding Officer.

Recruitment and Selection/JTL Staff

JTL will only recruit employees who have the required skills and experience and who have satisfactorily passed all of its recruitment vetting checks. These checks include, but are not limited to, identity, academic qualifications, professional references and previous employment history. An Enhanced Disclosure and Barring Service (DBS) check and necessary approvals will be required for all employees coming into contact with young people (children) and vulnerable adults.

Recruitment and Selection/Learners

Applicants who have identified or declared themselves as having, for instance, a disability, learning difficulty or medical condition, or are from a care background, may be classed as vulnerable. Where identified and evidence obtained, appropriate support will be provided to enable the applicant to undertake JTL's initial assessment.

Medical/Vulnerability Learner Risk Assessment

A Medical/Vulnerability Risk Assessment for a JTL-approved learner (JTL882) will be undertaken for all those identified as vulnerable at application stage. The risk assessment is to ensure that appropriate provision is in place to meet the individual learner needs.

Filming and Photography

Field staff are equipped with smartphones and one of their functions will be to capture the apprentice's photo ID for JTL's internal record system, JIB Registration, the apprentice's CSCS ID card and for gathering site assessment evidence for the apprentice's NVQ portfolios only.

Photo Consent

All learners will be required to complete a Learner Consent Form – Photography & Filming (JTL773) at the start of their apprenticeship/traineeship. Images or films captured will be used from time to time for marketing purposes. Any images captured will be stored securely and held by the marketing department. This also includes any young person/child visiting JTL, either as an independent or as part of school activity. Photos of JTL events will be published on JTL social network platforms, as well as its website. All photographs are taken in accordance with the guidelines relating to photos in schools published by the Information Commissioner with regards to the Data Protection Act 1998 and are carefully selected so as not to cause offence or distress to children, young people or parents.

Information Sharing

Campaigns/Events

Where campaigns/events involving any external organisations, such as schools, training providers and/or young people, take place on JTL premises, the JTL organiser will need to liaise with relevant managers to ensure safety and safeguarding measures are in place prior to the campaign/event.

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

A blanket consent form will be issued to external organisations as and when necessary for the external organisation to complete and send to JTL's Safeguarding Officer.

Visitors to JTL

All visitors to JTL offices or JTL training centres must sign in at the reception and must wear a visitor's badge at all times. Visitors must be accompanied by a member of JTL staff.

Working Away from Home

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

E-Safety

As a training provider JTL acknowledges that e-safety is one of the integral components to keeping staff and learners safe. JTL provides safe access to the internet and digital technology to all staff.

Access to the internet or email on computers within JTL including JTL Training Centre's will be monitored. Internet filtering systems are in place to monitor and safeguard all from accessing inappropriate sites; this is regularly reviewed and monitored by IT to ensure the filters have not been compromised.

Downloading and forwarding copyright information or materials that may be considered defamatory, racist, homophobic, incites hatred or violence or sexually explicit will be treated as gross misconduct. Emails received and/or passed on that contain jokes or a sexual or racial nature or jokes that cause offence and can be considered as harassment should be reported.

JTL Field Trips

Learners and staff are required to complete the following JTL documents JTL883, JTL884 and JTL885 prior to any JTL organised field trip: Next of Kin/Emergency Contact details. Learners are requested to inform JTL of any medical condition or medication that could affect their participation in a JTL organised field trip.

Radicalisation/Prevent – Counter-Terrorism

The Prevent Strategy is an integral part of the Counter Terrorism strategy and it aims to deter people from being drawn into, promotion or support of terrorism. Where a learner or a member of staff has been identified as being vulnerable or radicalised, JTL will refer the individual to Prevent Coordinators via the Channel Programme for assessment and support. JTL has a Prevent Strategy in place and a prevent policy guidance that sets out JTL's responsibilities (JTL 781).

Information Sharing

CCTV

The use of closed-circuit television (CCTV) is in operation across JTL Training Centres both internally and externally. The system comprises of a number of fixed cameras located around the training centre, including classrooms. All cameras are monitored from a central site that is only available to designated staff.

The CCTV system is registered with the Information Commissioner in compliance with the Data Protection Act 1988 and the Commissioner's code of practice.

Materials and images captured on CCTV will not be used for any marketing purposes or released to the media. Images will only be released for use in an investigation of a specific incident and only with written request from the authorities such as the police.

PPV (Pre-Placement Vetting)

Prior to commencing on a JTL scheme, the employers arrangement for Health, Safety and Welfare (HSW) for learners will be assessed. Employers will be required to demonstrate that they have adequate procedures in place.

The information gathered is recorded on the PPV Form for business and/or domestic premises (JTL311) and is continually monitored, updated and reviewed every three years.

Data Protection

JTL stores and processes information in compliance with the Data Protection Act (1998).

Complaints

Complaints

For any complaints on how an incident has been handled or the process taken, including outcome, employees and workers are advised to follow the procedure outlined in Complaints Register (JTL707). The complaint should be reported to the Quality Assurance Manager who will manage the complaint.

Definitions

Young Person (Child) is defined as a person under the age of 18 years old.

Vulnerable Adult is defined as a person aged 18 years old and over who may be unable to take care of themselves, or protect themselves from harm or from being exploited. This may be because they have a mental health problem, a disability and learning difficulty, a sensory impairment, or have some form of illness.

Learner is defined as an apprentice or a learner on a traineeship.

Vulnerable Learner (for JTL purposes) includes both young people and vulnerable adults from the age of 16 years onwards who have been identified as being vulnerable.

Abuse is defined as physical abuse, sexual abuse, emotional abuse, organised abuse, neglect and bullying. Depending on the nature of the abuse, this could lead to a criminal offence and conviction.

Harm is defined as damage, injury or distress to a person, which can be either physical or psychological.

Outside Agencies (not limited to):

- Social Services/Social Care Team/Local Authority Designated Officer;
- Police;
- NSPCC;
- Schools;
- Colleges;
- Training Providers;
- Channel Programme.

Legislation

JTL complies with all relevant legislation, in particular, but not limited to, the following:

- Children Act (1989);
- United Nations Convention on the Rights of the Child (1989);
- Human Rights Act (1998);
- Sexual Offences Act (2003);
- Children Act (2004);
- Safeguarding Children Working Together for Positive Outcomes (Welsh Assembly Government 2004);
- What to Do if You're Worried a Child is Being Abused (HM Government 2006);
- Safeguarding Vulnerable Groups Act (2006);
- Protection of Freedoms Act (2012) Part 5 Chapters 1–3;
- Working Together to Safeguard Children (2015);
- Counter Terrorism and Security Act (2015);
- Apprenticeship, Skills and Learning Act (2009);
- Education Act (2011).

Safeguarding Officer:

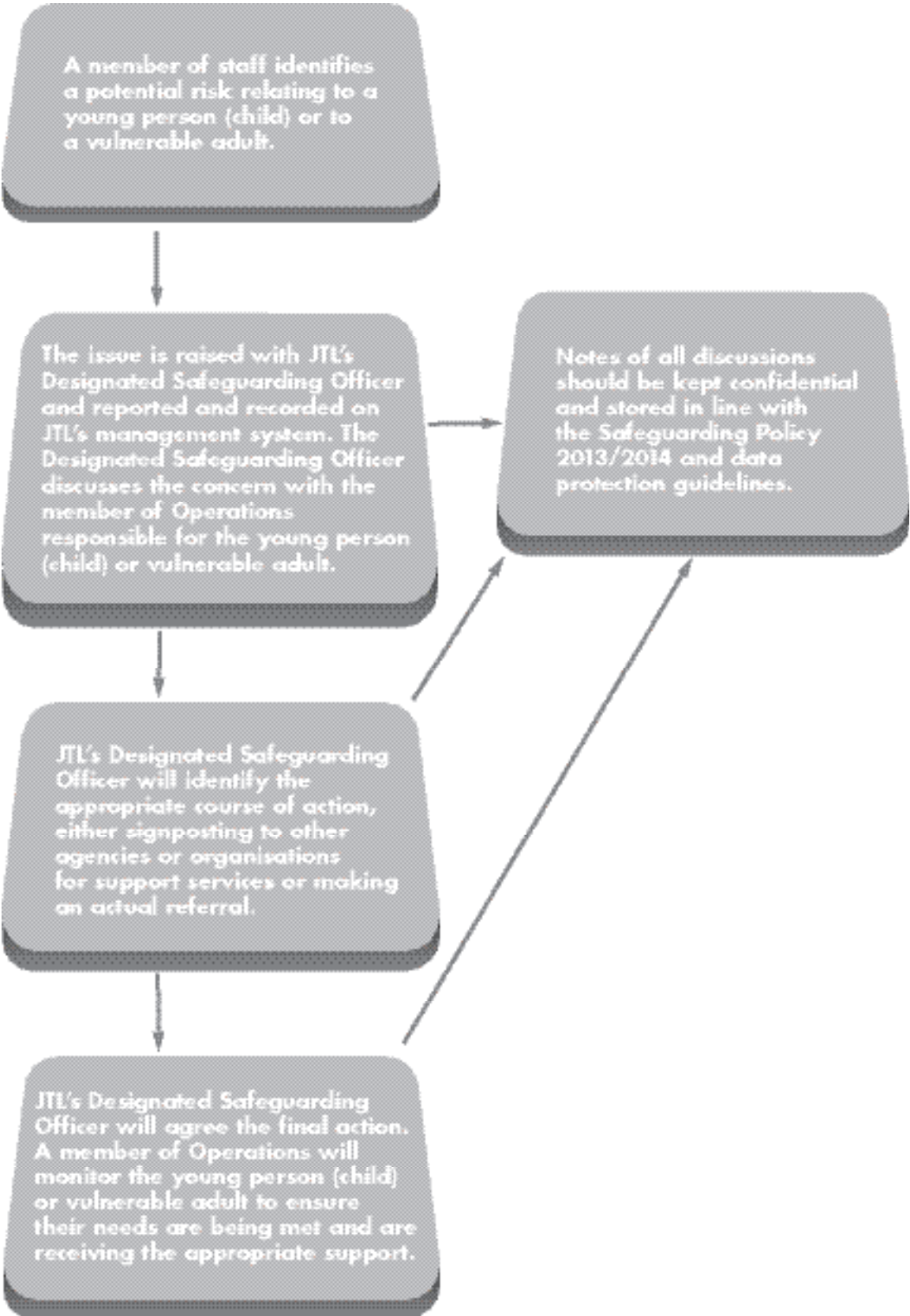
Yasmin Damree-Ralph
Equality and Diversity Officer
JTL
Stafford House
120-122 High Street
Orpington
Kent
BR6 0JS

Tel: 01689 884120
Mobile: 07825 607293
Email: yasmindamree-ralph@jtltraining.com

In the absence of the Safeguarding Officer, please refer any concerns to the Human Resources Director.

Reporting and Recording Procedure (Figure 1)

Figure 1



JTL Head Office:

Stafford House
120-122 High Street
Orpington
Kent
BR6 0JS

Call: 01689 884100 Fax: 01689 891658

Email: headoffice@jtltraining.com

Website: www.jtltraining.com

