

Safeguarding Policy

1. Introduction

Francis James Ltd is committed to safeguarding the wellbeing, safety, and dignity of all learners, staff and visitors. Although our learners are adults, we recognise our duty of care to create a safe, supportive learning environment and respond promptly to any safeguarding concerns.

2. Purpose

The purpose of this policy is to:

- Establish clear safeguarding standards and expectations.
- Provide guidance for recognising and reporting safeguarding concerns.
- Ensure that all safeguarding issues are managed consistently, sensitively and appropriately.
- Promote a culture where safeguarding is understood as everyone's responsibility.
- Support early intervention to prevent escalation of harm or distress.

3. Scope

This policy applies to:

- All employees, including part-time, visiting lecturers, contractors and volunteers.
- All enrolled learners engaging in learning, placements, online activities, events, or any activity associated with Francis James Ltd.
- Any environment where teaching, learning or support work takes place, whether on-site, online, or off-site.

4. Definitions

4.1 Safeguarding

Safeguarding refers to all actions taken to promote the safety, health and wellbeing of individuals and to protect them from harm. Within a higher-education setting, safeguarding includes proactively preventing abuse, neglect, exploitation, discrimination, harassment or harm, as well as responding appropriately when concerns arise. Under the Counter-Terrorism and Security Act 2015, UK universities have a specific statutory duty to safeguard people from being drawn into terrorism (the Prevent Duty).

Prevent, as with safeguarding overall, means looking out for when someone might be at risk of being drawn into harmful activities, and helping them to get the right support.

Safeguarding applies to **all learners**, including both adults and those aged under 18.

4.2 Learners Under the Age of 18

Although the majority of higher-education learners are adults, Francis James Ltd may occasionally admit learners who are **under 18 years old**. These learners are legally defined as **children** and therefore require additional protection.

For learners aged under 18:

- The organisation must follow the safeguarding standards that apply to children, as outlined in relevant UK legislation and guidance (e.g., the Children Act, child protection frameworks).
- Under-18 learners **cannot legally give consent** to some decisions in the same way an adult learner can, particularly when issues of safety or protection are involved.
- The threshold for concern is lower, and staff must take a more precautionary approach.
- Any safeguarding concern involving an under-18 must be treated as a **child protection** matter and reported immediately to the Designated Safeguarding Lead (DSL).
- Parental or carer involvement may be necessary depending on the nature of the concern.
- The DSL is responsible for determining whether external agencies such as Children's Social Care should be involved.

The presence of under-18 learners does not alter the adult-learning environment overall, but it does mean that all staff must be aware that the safeguarding duties toward these learners are more stringent.

4.2 Adults at Risk

The majority of learners with Francis James will be adults. An Adult at Risk is any person aged 18 or over who has care or support needs, is at risk of abuse or neglect, and may be unable to protect themselves.

4.3 Types of Abuse and Harm

There are a range of potential areas for abuse or harm to an individual, or groups of individuals. Broadly, these are:

- Physical Abuse
- Emotional and Psychological Abuse
- Sexual Abuse and Sexual Misconduct

- Financial and Material Abuse
- Neglect and Self-Neglect
- Discriminatory Abuse
- Domestic Abuse
- Online or Digital Abuse
- Exploitation

4.4 Contextual and Environmental Risk

Risks may arise from a number of factors including unsafe accommodation, local community or peer group factors, relationships, online networks or workplace environments.

4.5 Radicalisation and Extremism

Radicalisation is the process whereby a person is influenced or pressured to support extremist ideologies or behaviours. Signs may include changes in beliefs, values or behaviours, increased secrecy and increased intolerance or more argumentative behaviour. Francis James also has due regard to the Prevent Duty in our approach to safeguarding and learner wellbeing, which aims to safeguard people from being drawn into terrorism. Our statement on the Prevent Duty is available on our website.

5. Principles

Francis James Ltd is committed to:

- providing a safe environment
- acting promptly where risks or concerns arise
- maintaining confidentiality
- working collaboratively with agencies when necessary
- ensuring all staff are alert to their safeguarding responsibilities; and
- applying safeguarding procedures consistently.

6. Recognising Concerns

Safeguarding concerns can present in many ways. Staff are not expected to diagnose or investigate—only to notice signs, take concerns seriously and report them promptly to the DSL. Concerns may stem from a single incident or an emerging pattern over time.

Safeguarding concerns may arise from changes in a learner's behaviour, appearance, communication, or general wellbeing. Staff should be alert to signs such as sudden withdrawal, anxiety, low mood, unexplained distress, or marked changes in personality or confidence. Physical indicators such as unexplained injuries, deterioration in self-care, exhaustion or appearing unwell may also suggest a cause for concern. Even subtle changes can be significant, especially for learners under the age of 18, where a lower threshold for concern applies.

Concerns may also emerge through a learner's relationships, environment or circumstances. Isolation from peers, signs of controlling or harmful relationships, financial difficulty, unsafe or unstable accommodation, or reliance on others for money or basic needs can indicate vulnerability or exploitation. Digital behaviours may also raise concerns, such as cyberbullying, pressure to share personal images, involvement with harmful online groups, or secrecy around online activity. Any of these factors, individually or combined, may signal that a learner needs support or protection.

In addition, concerns may come to light through disclosures from the learner or from others, such as peers, staff, family members, or external professionals. Sometimes indicators are small when viewed in isolation but reveal a pattern over time.

Staff are not required to investigate or determine whether harm has occurred—only to take concerns seriously, document factual observations or disclosures and report them promptly to the DSL so that appropriate action can be taken.

7. Roles & Responsibilities

The Designated Safeguarding Lead (DSL) and Deputy DSL will coordinate safeguarding activity within Francis James. This includes staff training, records management and handling and concerns. The DSL is also responsible for monitoring the content of this policy and proposing changes in line with any legislative and guidance updates

All staff are responsible for being alert to early indicators of arising safeguarding concerns, recording and reporting concerns appropriately and attending training. A key responsibility of staff if they are approached by a learner with a safeguarding concern is: to listen to the person's story but not push for information; and to show acceptance of what is being said, without making any promises.

The Board of Francis James (and its relevant sub-committees) will retain oversight of this safeguarding policy, and be kept informed of relevant safeguarding risk management issues when appropriate. They will also be informed about any significant safeguarding compliance violations and the outcome of the investigations into their causes, including remedies to be put in place.

8. Reporting Procedure

Safeguarding concerns must be reported to the DSL or the Deputy DSL **as soon as possible and always on the same working day**, regardless of the nature or perceived severity of the issue. This should be done by **email to the DSL or Deputy DSL, including the words 'ACTION: Safeguarding concern' in the title of the email.**

Staff are not expected to make judgments about whether harm has occurred; their responsibility is simply to share concerns promptly with the DSL to ensure appropriate action can be taken. Reports should be based on factual observations or information disclosed by the learner, without interpretation or assumptions.

Where a staff member becomes aware of a safeguarding concern—whether through direct disclosure, a third-party report or observation—they must record the concern clearly, accurately and in the learner’s own words where relevant. This record should include the date, time, context, what was said or observed, and anything else the staff member believes may be relevant.

The staff member must then contact the DSL or Deputy DSL immediately, providing both the recorded information and any additional contextual detail. Staff should not promise confidentiality to a learner and must avoid escalating the situation or questioning the learner beyond gathering essential information.

Upon receiving a report, the DSL will review the information, assess the level of risk, and determine the appropriate response. This may involve speaking with the learner to clarify concerns, consulting with internal colleagues, or—where necessary—referring the matter to external agencies such as Children’s or Adults’ Social Care, the police, mental-health services or emergency services.

If there is an immediate perceived risk to life or of serious harm, staff should contact emergency services first and then inform the DSL at the earliest opportunity.

The DSL will document all decisions, actions taken and reasons for those actions, ensuring secure record-keeping in line with data-protection requirements. Staff will be informed when their concern has been received, but outcomes will only be shared on a need-to-know basis.

10. Confidentiality & Information Sharing

Information is shared only when necessary to protect individuals from harm and always in line with data-protection legislation.

Records will be secure, encrypted and accessible only to the DSL and Deputy DSL.

11. Training

All staff are required to complete essential safeguarding training, with enhanced training for DSLs.

12. Policy Review

This policy will also be reviewed in full annually, as well as being monitored on an ongoing basis by the DSL in relation to any legislative changes.

Written By	Revision Date	Revision Number	Approved By	Review Date
H Barratt	12/01/2026	1	 S Graham	12/01/2027