



Big Condo Academy CIC

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To be read and understood by:

Staff, volunteers, students, employers, work experience Providers, school Mentors and all relevant partners, customers and anyone coming to the company.

POL0005:

Big Condo Academy

Safeguarding Policy and Procedure

Purpose of the Policy

This policy states the responsibilities of Big Condo Training Academy CIC in relation to Safeguarding children and vulnerable adults, in response to current Legislation and guidance. It incorporates the Prevent Duty to comply with the Counterterrorism and Security Act (2015).

Policy Statement

Big Condo Training Academy CIC is committed to a positive policy of equal opportunity and strives to support learners wherever possible. It wishes to create an environment that is safe and welcoming to all learners and Safeguarding is an essential element to promote a positive culture where learners can learn and develop. It recognises that it has a duty of care to learners, staff and stakeholders and endeavours to ensure that their wellbeing and health and safety is a priority. Safeguarding is a whole organisation approach.

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Creating a Safe Environment.

To create a safe environment for learners Big Condo Training Academy CIC will.

- Operate a 'zero tolerance' approach to bullying and other anti-social behaviour.
- Have clear procedures for following up issues of conduct for both staff and learners.
- Continually review safety and security
- Work closely with partner organisations to ensure the welfare of learners.
- Ensure all staff, including volunteers, have appropriate DBS, CRB and other checks as deemed appropriate through risk assessment of job roles.

Provide training and support for staff.

All staff will be given up to date information on Safeguarding through:

- A clear induction programme, which includes Safeguarding.
- Taking part in appropriate Safeguarding Training, in line with specific job roles
- Being made aware of BIG CONDO TRAINING ACADEMY's policy and procedures on Safeguarding
- Being offered other relevant suitable training / information, as and when appropriate
- Being provided with contact details for the relevant safeguarding staff
- Provide staff with external counselling / supervision where appropriate.

Positive Promotion.

Safeguarding, in its broadest sense, will be promoted positively throughout BIG CONDO TRAINING ACADEMY CIC in several ways, including.

- Policy and Procedures available for stakeholders, such as parents/guardians
- Tutorials, including links to Every Child Matters
- Learner Induction
- Equality and Diversity embedding
- Health and Wellbeing, Anti-bullying, E-Safety promotion, and information, including thematic awareness throughout the programme.
- Ensure Safeguarding is included within the 'Learner Voice' process.
- Information awareness raising will be responsive to local and national trends.
- Positive links with communities to prevent radicalisation and extremist acts.

Support for Learners.

Learners will be offered support through several mechanisms including:

- timely interventions or continuous support to our most vulnerable learners
- Additional Support for learners with learning difficulties / disabilities and/or medical needs
- Referrals to counselling services and links with personal advisors to identify the most appropriate interventions and support for learners on an individual basis.
- Links developed with external agencies, including agencies linked to specific groups such as Looked After Children (LAC) (including those leaving care), Mental Health Services, Youth Offending Service (YOS).
- Considering the needs of the individual and responding as far as is reasonably practicable.

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Safeguarding Management.

The Management Team will oversee all aspects of Safeguarding by.

- Meeting a minimum of 3 times per year to review developments and monitor activities.
- Develop and implement an annual action plan to ensure continual improvement.
- Monitor volume and types of disclosures monthly and compile an annual report.
- Monitor and review each individual safeguarding or wellbeing incident to ensure timely and appropriate follow-up.
- Update and review the Safeguarding Policy and Procedures annually or in line with relevant legislative changes.

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Legal Framework

The Children Act 1989 placed a duty on local authorities to investigate situations where a child is at risk of significant harm. Educational establishments had a legal obligation to work with investigating agencies acting on behalf of children in need. Guidance was published in 'Safeguarding Children in Education' (2004). It set out the requirements to provide a safe learning environment, identify young people suffering, or likely to suffer, significant harm and take appropriate action in full partnership with other local agencies. It encompassed wider issues such as health, safety, drug/substance abuse and bullying as well as the contribution made to safeguarding in relation to individual children and underpinned our common law duty of care.

This was replaced and extended in January 2007 by 'Safeguarding Children and Safer Recruitment in Education' which includes more specific guidance (including some statutory requirements) relating to the recruitment and vetting of staff, in the light of the Bichard Enquiry into the Soham murders.

The responsibility for making sure appropriate arrangements are in place lies with the Managing Director. Staff are responsible for carrying out their duties in compliance with the arrangements set out by this policy.

BIG CONDO TRAINING ACADEMY CIC is not an investigating agency. This function is carried out by local authority Children's Services, or other agencies with statutory powers. The Children Act 1989, and subsequent legislation and guidance, are concerned with the emotional, physical, or sexual abuse or neglect of children, defined as under the age of 18. However, it is recognised that children acquire degrees of legal capacity (for example, the ability to give informed consent) and maturity prior to their 18th birthday, and that there are adults over 18 who continue to be vulnerable due to a learning difficulty and/or disability.

This policy and related procedures are driven by the following legislation and guidance:

- Children Act 1989
- Children Act 2004
- Dealing with allegations of abuse against teachers and other staff – Department for Education 2011
- Education Act 2002 (s175)
- Equality and Diversity Act 2010
- Safeguarding Vulnerable Groups Act 2006
- Working Together to Safeguard Children (DCSF 2010)
- Safeguarding Children and Safer Recruitment in Education (DfES 2006)
- Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings (DCSF 2009)
- Safer Practice, Safer Learning (NIACE 2007)
- Children's Plan 2007
- DfES Safeguarding Children in Education
- Every Child Matters: Next Steps
- Excellence Gateway – Safeguarding, 2009
- Local Safeguarding Children Board
- NSPCC – Guidance on Child Protection Records
- The Protection of Children in England – the Government Response to Lord Laming, 2009
- Safeguarding children from forced marriages.
- Vetting and Barring Scheme – Update. Independent Safeguarding Authority, 2009
- Working Together to Safeguard Children – March 2010
- The Counterterrorism and Security Act 2011

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Definitions

Throughout this policy the following definitions apply:

Child – in accordance with The Children Act 1989, and therefore in accordance with law, BIG CONDO TRAINING ACADEMY CIC shall regard any young person below the age of 18 as a child.

Child abuse - may be physical, sexual, or emotional abuse, or neglect.

Designated person(s) - the staff member(s) designated as having responsibility for liaising with the investigating agency.

Domestic Violence – can be physical, emotional, sexual, neglect. This category also covers Forced Marriages and honour-based violence.

Emotional abuse - emotional abuse is the persistent emotional ill treatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to the child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. Age or developmentally inappropriate expectations being imposed on children, causing children frequently to feel frightened, or the exploitation or corruption of children will also constitute emotional abuse. This may also include overprotection and limitation of exploration and learning or participating in normal social interaction. It can include seeing or hearing ill treatment of another person. It may include serious bullying, including cyber-bullying. It may include not giving the child opportunities to express their views, deliberately silencing them, or making fun of what they say or how they communicate.

Extremism – holding extreme religious or political views.

Learner – the term 'learner' for this policy covers learners of BIG CONDO TRAINING ACADEMY CIC who are enrolled with the organisation for study. The policy also covers those learners who are on placement as part of their programme. In addition, it covers learners who are applying to be enrolled with BIG CONDO TRAINING ACADEMY CIC and are in the "recruitment" stage of the learner journey.

Neglect - neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development such as failing to provide adequate food, shelter and clothing, medical care or treatment or neglect of, or unresponsiveness to, a child's basic emotional/physical needs. It can include not protecting a child from emotional harm or danger.

Physical abuse - actual or likely physical injury to a child, or failure to prevent injury. May involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating or otherwise causing physical harm. Physical harm may also be caused when a parent or carer feigns symptoms of, or deliberately causes, ill health to a child they are looking after.

Prevent Duty – The Statutory duty to have due regard to the need to prevent people from being drawn into terrorism.

Radicalisation – vulnerable individuals being targeted for recruitment into extremism.

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Risk to self and/or others – This may include but is not exclusive to self-harm, suicidal tendencies, or potential risk of harming others, which may or may not include children. This may be because of an individual experiencing a significant level of personal, emotional trauma and/or stress.

Sexual abuse - actual or likely sexual exploitation of a child, including prostitution. Involving forcing or enticing a child or young person to take part in sexual activities whether a child is aware of what is happening. The activities may involve physical contact including penetration or non-penetrative acts. For example, it may also include involving the child looking at or being involved in the production of, pornographic material or watching sexual activities, or encouraging the child to behave in sexually inappropriate ways. Can include grooming a child in preparation for abuse.

Safeguarding - includes promotion of health and well-being as well as protection of specific individuals.

Significant harm - ill treatment or the impairment of health or development (compared with the health or development which might be expected of a similar child)

Terrorism – undertaking unauthorised or unofficial acts of violence or intimidation in pursuit of a political aim or agenda.

Vulnerable Adult – a person aged 18 or over. who is or may be in need of community care services by reason of mental or other disability, age or illness...**and** is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation In this document the statutory definition of a Vulnerable Adult in the Safeguarding of Vulnerable Groups Act may differ from those who may be vulnerable in terms of the Counterterrorism and Security Act.

Designated staff

The designated persons with responsibility for safeguarding are:
Gemma Gosling Safeguarding officer and Roy Blair managing director.

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Safeguarding learners aged 16 and 17

These learners are covered in law by the Children Act. This means that allegations or suspicions of abuse must be taken seriously by BIG CONDO TRAINING ACADEMY CIC and acted upon according to the procedure.

Concerns or suspicions must be referred to a designated staff member even if the learner's stated wishes are to the contrary, this must be done by telephone and then followed up in writing. They will seek advice from the appropriate agency and agree any further action which may be necessary. This may include a formal referral.

Learners aged 16 and 17 are encouraged to report the abuse, or give consent for a report to be made, to an investigating agency (usually the Children's Services in the area where the learner lives). However, they should be made aware that it may be necessary to report the abuse even without their consent.

The following issues are relevant: - what are the wishes of the learner? - are younger siblings involved?

- is a criminal act being committed?

- is there risk of significant harm?

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Safeguarding Learners aged 18 or over

Definitions of 'vulnerable adult'

A vulnerable adult is a person aged 18 years or over who may be unable to take care of themselves or protect themselves from harm or exploitation. People who fall into the vulnerable category may include those with learning disabilities or mental health problems. Adults may also be classed as being vulnerable if their situation is complicated by additional factors such as:

- Physical frailty
- Chronic illness
- Sensory impairment
- Challenging behaviour
- Social problems
- Emotional problems
- Poverty
- Homelessness
- Substance misuse
- Age-related frailty

Vulnerable adults enrolling may have a named advocate who should be identified at interview stage.

Responding to a disclosure or suspicions of abuse

Any member of staff who has knowledge of, or a suspicion that, a child is or has been suffering significant harm must refer their concern to a designated member of staff or a learner's personal advisor within the partner organisation as soon as possible but within 24 hours at the latest. They must also pass any written notes to the Safeguarding Officers and not retain any written information. All allegations or suspicions must be taken seriously. The learner must be advised that this information cannot be kept confidential and will be passed on to the designated member of staff in the first instance. This also applies to instances whereby information is received by a member of staff about the possibility that a child who is not a learner requires or may require safeguarding.

The designated officer who receives the allegation or disclosure of abuse should make an immediate written record of the conversation, including the following information:

- date and time of report
- your name and name of complainant
- name and DOB of child alleged to have been abused
- nature of alleged abuse
- description of any injuries observed if any
- any other information given, including siblings if relevant (their full names and DOB if possible)
- confirmation that the learner has been advised of the next steps

Questions should be kept to the minimum required for clarity, and leading questions must be avoided.

If uncertain about any situation, advice (which should be recorded) should be sought from relevant organisations, for example from Police, Children's Services, Adult Care Services etc.

If abuse is suspected but not disclosed, it may be appropriate to remind the learner about the availability of referral to Counselling Services or external help lines.

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Definitions of abuse against vulnerable adults

Physical abuse - includes hitting, slapping, pushing, kicking, rough handling or unnecessary physical force, either deliberate or unintentional, misuse of medication, restraint, or inappropriate sanctions.

Sexual abuse - includes rape and sexual assault or sexual acts to which the vulnerable adult has not consented, or could not consent to, or was pressured into consenting to. Sexual abuse can occur between people of the same sex, and it can also occur within a marriage or any long-term relationship.

Psychological abuse - includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, or isolation.

Financial or material abuse - includes theft, fraud, exploitation, pressure in connection with wills, property, enduring power of attorney, or inheritance or financial transactions, or the inappropriate use, misuse or misappropriation of property, possessions, or benefits.

Neglect and acts of omission - includes ignoring or withholding medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition, clothing, and heating.

Discriminatory abuse - includes racist, sexist, or discrimination based on a person's disability.

Self-neglect - is not a direct form of abuse but staff need to be aware of it in the general context of risk assessment/risk management and to be aware that they may owe a duty of care to a vulnerable individual who places him/herself at risk in this way.

Forced Marriage - A forced marriage is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. It is an appalling and indefensible practice and is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights. The pressure put on people to marry against their will can be physical (including threats, actual physical violence, and sexual violence) or emotional and psychological (for example, when someone is made to feel like they're bringing shame on their family). Financial abuse (taking your wages or not giving you any money) can also be a factor. Appendix A contains further detail on signs a person may be vulnerable to this form of abuse.

What to do if you suspect a vulnerable adult is being abused

Any member of staff who has knowledge of, or a suspicion that, a vulnerable adult learner is or has been suffering abuse must refer their concern to the Safeguarding Officers as soon as possible by telephone then followed up in writing. All allegations or suspicions must be taken seriously. The learner must be advised that this information cannot be kept confidential and will be passed on to the Safeguarding Officers in the first instance.

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Safeguarding learners in the workplace

In accordance with this Policy. Assessments are made to ensure that the learners' well-being is safeguarded by the work placement team. BIG CONDO TRAINING ACADEMY CIC has arrangements in place to ensure that, prior to work related work commencing:

- Pre-placement Health and Safety checks of employers' premises and health and safety management arrangements are complete, including insurance details
- Consents (parental / guardian / learners) are obtained
- Employers are made aware of relevant policies
- The requirements for DBS checks are assessed and the relevant processes undertaken where required

Preventing Extremism and Radicalisation

The Context

Preventing people being drawn into terrorism has never been more important. In August 2014 the Joint Terrorism Analysis Centre (JTAC) raised the threat level to severe, the second highest level, in response to the heightened threat facing the country.

Prior to this, in December 2013, the Prime Minister's Taskforce looked at what more could be done to tackle extremist activity that "creates an environment for radicalising individuals and could lead them on a pathway towards terrorism."

One of the recommendations stemming from the report was to put Prevent on a statutory footing, and as a result a new statutory duty to have regard to prevent people being drawn into terrorism was introduced as part of the February 2015 Counterterrorism and Security Act. The duty applies to several public and other specified bodies, including colleges and certain education and training providers.

All colleges and education and training providers have the need to safeguard their learners from harm, and the risk from radicalisation of any type is no different. The aim of this section is to set out a clear framework that staff should follow to minimise the risk and protect our learners.

Our aim

BIG CONDO TRAINING ACADEMY CIC values freedom of speech and the expansion of beliefs / ideology as fundamental rights underpinning our society's values. Both learners and staff have the right to speak freely and voice their opinions. However, with freedom comes responsibility and free speech designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

Risk Assessment

The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people, to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make children, young people, and other members of society vulnerable to future manipulation and exploitation. BIG CONDO ACADEMY is clear that this exploitation and radicalisation should be viewed as a safeguarding concern.

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Definitions

BIG CONDO ACADEMY seeks to protect children, young people, and other learners against the messages of all violent extremism including, but not restricted to, those linked to Extreme Islamist ideology, or to Far Right / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

Extremism – holding extreme religious or political views.

Islamic Extremism – also referred to as Radical Islam or Islamic supremacy and it should not be confused with mainstream Islam. Further information about Islamic Extremism is contained at <http://www.clarionproject.org/understanding-islamism/islamic-extremism#>

Radicalisation – vulnerable individuals being targeted for recruitment into extremism, or individuals at risk of being drawn into extremist acts. An individual vulnerable to radicalisation will not meet the statutory definition of a vulnerable adult.

Terrorism – undertaking unauthorised or unofficial acts of violence or intimidation in pursuit of a political aim or agenda.

Risk reduction

The Senior Management Team and the Designated Safeguarding Person will assess the level of risk within our services and put actions in place to reduce that risk. Risk assessment may include consideration of the use of shared premises with external agencies, curriculum offer, provision specifically targeting vulnerable groups, disclosed safeguarding cases, anti-bullying policy, equality and diversity policy, whistle-blowing policy and other issues specific to our service, mission and the communities which we serve.

Designated lead and contacts

When a member of staff has any concerns that a learner may be at risk of radicalisation or involvement in terrorism, they should speak with the Designated Safeguarding Officer. The lead within the organisation for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism is the Designated Safeguarding Officer.

The Single Point of Contact internally is James Johnston Lynch.

Additional contacts include the following: Phil Beale.

The Designated Person will determine the appropriate course of action. However, if a crime is being committed or there is a threat to someone's life call 999 immediately.

- To report illegal information, pictures or videos found on the internet log on to www.gov.uk/report-terrorism
- To report concerns, call the Police Confidential Anti-Terrorist Hotline number: 0800789321

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Interventions and supporting learners

Numerous factors can contribute to and influence the range of behaviours that are defined as violent extremism, but most young people do not become involved in extremist action. For this reason, the appropriate interventions in any case may not have any specific connection to the threat of radicalisation, for example they may address mental health, relationship or drug/alcohol issues.

Where a concern relating to radicalisation is raised, the Designated Person will investigate the concern and liaise with the relevant local authority and the Channel Programme. This is normally through a single referral point through a local safeguarding board.

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. The programme uses a multi-agency approach to protect vulnerable people by:

- identifying individuals at risk
- assessing the nature and extent of that risk
- developing the most appropriate support plan for the individuals concerned

It is not the responsibility of BIG CONDO TRAINING ACADEMY CIC to singularly deal with these issues.

Indicators of vulnerability to radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

Extremism is defined by the Government in the Prevent Strategy as:

- Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.
- We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

Extremism is defined by the Crown Prosecution Service as the demonstration of unacceptable behaviour by using any means or medium to express views which:

- Encourage, justify, or glorify terrorist violence in furtherance of particular beliefs.
- Seek to provoke others to terrorist acts.
- Encourage other serious criminal activity or seek to provoke others to serious criminal.
- acts; or
- Foster hatred which might lead to inter-community violence in the UK.

There is no such thing as a "typical extremist": those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

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Indicators of vulnerability:

- Identity Crisis – the learner is distanced from their cultural / religious heritage and experiences discomfort about their place in society;
- Personal Crisis – the learner may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging.
- Personal Circumstances – migration; local community tensions; and events affecting the learner's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
- Unmet Aspirations – the learner / pupil may have perceptions of injustice; a feeling of failure; rejection of civic life.
- Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration.
- Learning Support Needs – learners may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

This list is not exhaustive, nor does it mean that all people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

Other critical risk factors could include:

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

Possible Signs of Radicalisation

- The individual's views become increasingly extreme regarding another section of society or government policy.
- They are observed downloading, viewing or sharing extremist propaganda from the web.
- They become withdrawn and focused on one ideology.
- The individual becomes increasingly intolerant of more moderate views.
- The individual may change their appearance, their health may suffer (including mental health) and they may become isolated from family, friends, peers or social groups.
- The individual expresses a desire/intent to take part in or support extremist activity.

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Confidentiality

A good working relationship between staff and learners depends to a large extent on the establishment of trust. This may be described as a 'confidential relationship'. However, guarantees of absolute confidentiality should not be given. If a learner discloses abuse to a member of staff, it is important that the boundaries of confidentiality and the need to pass on that information are explained. It is often easier to explain that you have a responsibility to pass on information on certain matters than to get into a situation where you break a confidence.

Safe Recruitment of Staff

BIG CONDO TRAINING ACADEMY CIC follows good practice guidelines from Safer Recruitment and Every Child Matters: Next Steps.

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Staff code of conduct

All staff who work at BIG CONDO TRAINING ACADEMY CIC must set examples of behaviour and conduct which can be copied by learners. Staff must therefore avoid using inappropriate or offensive language.

All staff must, therefore, demonstrate high standards of conduct to encourage our learners to do the same.

All staff must also avoid putting themselves at risk of allegations of abusive or unprofessional conduct.

Staff must not seriously demean or undermine learners, their parents or carers, or colleagues.

Staff must take reasonable care of learners under their supervision with the aim of ensuring their safety and welfare.

Staff must comply with BIG CONDO TRAINING ACADEMY CIC and partner policies and procedures that support the well-being and development of learners.

Staff must co-operate and collaborate with colleagues and with external agencies where necessary to support the development of learners.

Staff must follow reasonable instructions that support the development of learners.

Staff must maintain high standards of honesty and integrity in their work. This includes the handling and claiming of money and the use of Academy property and facilities.

Staff must not engage in conduct outside work which could seriously damage the reputation and standing of the organisation or the employee's own reputation or the reputation of other members of the organisation or its partners. Criminal offences that involve violence or possession or use of illegal drugs or sexual misconduct are likely to be regarded as unacceptable.

Staff must exercise caution when using information technology and be aware of the risks to themselves and others.

Staff may undertake work outside BIG CONDO TRAINING ACADEMY CIC, either paid or voluntary, if it does not conflict with the interests of the organisation, nor be to a level which may contravene the working time regulations or affect an individual's work performance.

Staff must not engage in inappropriate use of social network sites which may bring themselves, the organisation, or its partners into disrepute.

Where staff have access to confidential information about learners or their parents or carers, staff must not reveal such information except to those colleagues who have a professional role in relation to the learner.

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Allegations against staff

BIG CONDO TRAINING ACADEMY CIC clearly sets out its expectations in terms of staff behaviours and provides staff with information on keeping themselves safe. Nevertheless, allegations against staff may occur.

It is a criminal offence for a person over the age of 18, in a position of trust, to enter a sexual relationship with any learner under 18 years old, even if the relationship is consensual.

If allegations are made against a member of staff, the directors must be informed immediately, and relevant disciplinary procedures maybe invoked. BIG CONDO TRAINING ACADEMY CIC must also advise the Local Authority Designated Officer (LADO) who may undertake a suitability assessment.

Support for staff

This policy document is available to staff through induction.

Where a member of staff finds a disclosure particularly distressing, they may wish to access Counselling Services, and this can be done by contacting one of the directors.

The directors have an open-door policy for any staff who wish to discuss their concerns, staff will need to be mindful that the directors cannot give absolute confidentiality to learners for any disclosures.

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