

## Safeguarding & Prevent Policy

<b>Document Title:</b>	Safeguarding and Prevent
Originator:	Director
Date of Approval:	May 2022
Responsible Person:	Centre Manager / Designated Safeguarding Lead
Policy due for renewal:	Feb 2024
Version	10.2.0

## Introduction

Ginger Nut Training has a statutory and moral duty to ensure that we function with a view to safeguarding and promoting the welfare of children, young people and vulnerable adults receiving education and training. Throughout these policies and procedures, reference is made to 'children and young people'. This term is used to mean 'those under the age of 18'. The governing body recognises that some adults are also vulnerable to abuse and, accordingly, these procedures may be applied (with appropriate adaptations) to allegations of abuse and the protection of vulnerable adults. Vulnerable adults have the same rights, in law, to special measures as children.

The company is committed to ensuring that we:

- Provide a safe environment for children and young people to learn in.
- Identifies children and young people who are suffering or are likely to suffer significant harm.
- Take appropriate action to see that such children and young people are kept safe, both at home and whilst attending their work and education. In pursuit of these aims, Ginger Nut will approve and annually review policies and procedures with the aim of:
  - Raising awareness of issues relating to the welfare of children and young people and the promotion of a safe environment for the children and young people learning.
  - Aiding the identification of children and young people at risk of significant harm and providing procedures for reporting concerns.
  - Establishing procedures for reporting and dealing with allegations of abuse against members of staff.
  - The safe recruitment of staff and on-going training. In developing the policies and procedures, the governing body will consult with, and take account of, guidance issued by the Department for Education (DCSF), National Institute of Adult and Continuing Education (NIACE) and other relevant bodies and groups.
  - Promoting physical, mental and general health and well-being to all staff and apprentices.

The procedures have been developed in cooperation with the Directors, senior managers and consultants. In recent years there has been increasing concern about the safety and welfare



of children, young adults and vulnerable adults throughout the UK. FE settings have traditionally considered the welfare of under 18s as part of their Duty of Care obligations. Since 2020, Covid-19 has also led to increased risks around mental health, online safety and monitoring the wellbeing of learners remotely.

Ginger Nut Training take into account all safeguarding regulation, including:

- The Protection of Freedoms Act 2012.
- The Education Act (2002) Section 175.
- The Children Act (1989 and amendments).
- The Children Act 2004.
- Working Together to Safeguard C2006.
- Safeguarding of the Vulnerable Adult guidance 2006.
- Safeguarding of Vulnerable Adult Schemes.
- 'Aim safer: A Framework for Safeguarding Children & Young People in Higher Education Institutions'.

The Children Act 1989 states the legal definition of a child is “a person under the age of 18”.

Section 115(4) of the Police Act 1997 states that a person can be considered to be vulnerable if they are: “substantially dependent upon others in performing basic physical functions, or ability to communicate with those providing services, or to communicate with others, is severely impaired, and, as a result, would be incapable of protecting himself from assault or other physical abuse, or there is a potential danger that his will or moral well-being may be subverted or overpowered”

All staff working with children, young adults and vulnerable adults will receive training adequate to familiarise themselves with child protection issues and the professional responsibilities, roles and duties to follow which are outlined within we policy and procedures. Update training will be required within a three-year period, or earlier as need is identified and judged appropriate.

A senior member Management team will hold overall responsibility for child protection with support from other members of staff with specific safeguarding responsibility. Ginger Nut Training have 3 staff who are designated safeguarding officers, the Centre Quality Assurer and two Deputy Safeguarding Leads.



### Procedure for investigating reported Incidences

If staff have any safeguarding or prevent concerns then they should complete a Safeguarding incident form and immediately pass it to the safeguarding lead. If the safeguarding lead is not available for any reason it should be raised to the Director responsible for safeguarding or deputy safeguarding lead:

- Safeguarding Lead – Susan Pope - 07999 725 530
- Deputy Safeguarding Lead:
  - Tanya Murphy - 07921 814 310
- Director – Dan Williams - 07834 554 379

If a concern or allegation is received, then please follow procedures as laid out in the “Staff reporting guide handout” at the end of this document.



## Safeguarding Principles

Ginger Nut Training believes that children/young people have rights as individuals and should be treated with dignity and respect.

We will strive to provide a safe environment for all learners in its care while they are on site studying, off site visiting or participating in wider Business activities.

This policy and the related procedures are based on the following principles:

- The welfare of children, young people and vulnerable adults is of primary concern.
- All children, young people and vulnerable adults, whatever their age, culture, disability, gender, language, racial origin, socio-economic status, religious belief and/or sexual identify have the right to safeguarding from abuse.
- It is everyone's responsibility to report any concerns about abuse to one of the nominated safeguarding contacts identified within this document, and the responsibility of the Social Services Department and the Police to conduct, where appropriate a joint investigation.
- All incidents of alleged poor practice, misconduct and abuse will be taken seriously and responded to swiftly and appropriately.
- All personal data will be processed in accordance with the requirements of General Data Protection Regulation (GDPR)
- Education is powerful and can help equip individuals with knowledge, skills and critical thinking. Ginger Nut Training also value the ability for learners to challenge any radical thinking and encourage apprenticeship support tutors to facilitate healthy debate and will embed throughout teaching and delivery. Ginger Nut Training want to encourage learners to be aware of the risks under the Prevent Strategy for themselves and to able to identify signs and possible risks. Online training is available to learners from induction throughout their stay on programme.

### Responsibility

All staff and learners are required to take shared responsibility for the safeguarding and safety of any children, young people and vulnerable adults on or off campus.

They must be aware of and abide by our Code of Good Practice. All Business staff are in a position of trust, in particular staff who teach, support, guide or in any way interact with learners, young people and vulnerable adults visiting.

The Safeguarding Lead has responsibility for overseeing our Safeguarding & Prevent Policy with delegated responsibility to relevant members of staff.

The Directors have nominated the Centre Quality Assurer as the senior member of staff responsible for child and vulnerable adult safeguarding issues within Ginger Nut (the Child and Vulnerable Adult Safeguarding Officer (CVAO)) and they will liaise directly with the Training Coordinator as deemed necessary.

Additionally, the Safeguarding Lead will ensure that arrangements are in place for the following specific areas:

- Liaising with employers and training organisations that receive children, vulnerable adults or young people on placements to ensure that appropriate safeguards are put in place whilst off site on work experience/placements in the workplace.
- Liaising with other organisations and designated individuals that are involved with the learners outside these environments.

Ginger Nut Training have other named individuals whom staff may contact if they have any concerns relating to any learner.

It is incumbent on all staff to be aware of their Safeguarding Responsibilities and to act accordingly, at all times.

We have processes in place to check the suitability of staff and learners working directly with children and young people and vulnerable adults (see Ginger Nut Training Pre-Employment Checks), which includes the below.

Ginger Nut Training is committed to ensuring that staff have satisfactory Disclosure & Barring Service (DBS) enhanced checks undertaken by us before starting work with Ginger Nut. A satisfactory check is defined as having no criminal convictions (including cautions, reprimands and final warnings) relevant to the post. Should convictions be returned by the process a member of the Senior Management Team with appropriate DSP (Designated Senior Person safeguarding) training will assess the level of risk associated with the appointment and determine if the applicant is suitable for appointment. These are subsequently checked every three years.

All staff or Tutors must report any subsequent criminal convictions to a company Director. Failure to do so will result in disciplinary action being taken. Where we are operating in partnerships, perhaps offsite, and partner employees come into contact with Ginger Nut Training learners we will seek assurance that their employees will have been through the same pre-employment checks expected of Ginger Nut Training staff.



## Vulnerable Adults

We will adhere to the policy and procedures that County Council and ESFA have in place. Where possible Ginger Nut Training will identify vulnerable adults and ensure that there are appropriate support measures in place. Any member of staff across Ginger Nut Training with concerns regarding an adult learner whom they believe or know to be vulnerable must contact one of the Safeguarding contacts. The role of a Designated Safeguarding Contact is:

- To receive and record information from any staff, volunteers, children, parents or carers who have child safeguarding concerns.
- Assess the information promptly and carefully, clarifying and obtaining more information about the matter as appropriate
- Make a formal referral to Customer First or the police

## Reporting and Monitoring Procedures

All members of staff working closely with children, or vulnerable adults, need to be alert to possibilities of abuse and any concerns about the behaviour of any adult with respect to that child should be reported to one of the Safeguarding contacts who will decide what further action to take.

Likewise, all learners must be made aware of risks around sexual harassment in the workplace or a learning environment and how to recognise and minimise these. This should be delivered via webinar and additional resource to ensure all training reflects current best practice.

If staff, in the course of their work at Ginger Nut Training, have a safeguarding issue brought to their notice, this must be treated as a priority over all other work. An oral, and then written report should be provided to the safeguarding contact dealing with the matter who will keep a confidential record of any such incidents.

Tutors will report absences of apprentices as follows:

- Failing to attend session and/or work – apprenticeship support tutor will record on the appropriate review report and collaborate with the employer



- Apprentices ongoing absences from sessions/ work – the apprenticeship support tutor will ascertain with the apprentice any reasons for absences and record on appropriate form. The apprenticeship support tutor will support the apprentice to follow employer policy and procedure for managing absences.
- Raise any concerns at the earliest point to Ginger Nut Training Centre Manager and/ or Safeguarding Officer.

These absences are tracked via OneFile and reviewed monthly as part of Director/Centre Manager reporting processes.

### Allegations of Abuse or Inappropriate Behaviour Involving Staff

Allegations involving a member of staff and a person under 18 or a vulnerable adult should be reported to the responsible director and the senior manager designated for safeguarding matters.

Consideration will be given as to whether the situation falls within the definition of abuse.

### Training

Ginger Nut Training will ensure that this policy will be promoted to all staff and they will receive appropriate training as follows:

Designation	Training required	Frequency
Directors	Standard Online safeguarding and prevent training modules	Annual
	Safer recruitment – Director responsible for recruitment	Three years
	Prevent – core topic updates with regional prevent coordinator	Annual
Senior Managers	Standard Online safeguarding and prevent training modules	Annual
	Safer recruitment	Annual
	Prevent – core topic updates with regional prevent coordinator	Annual
Safeguarding Lead	Level 3 Designated Safeguarding Lead	Two years





	Prevent – 2 day  Enhanced Online safeguarding and prevent training modules  Prevent – core topic updates with regional prevent coordinator	Three years  Annual  Annual
Deputy Safeguarding Lead	Level 3 Designated Safeguarding Lead  Prevent – 2 day  Enhanced Online safeguarding and prevent training modules  Prevent – core topic updates with regional prevent coordinator	Two years  Three years  Annual  Annual
Delivery and admin staff	Standard Online safeguarding and prevent training modules  CPD – internal and external  Safer recruitment – admin supporting with recruitment  Prevent – core topic updates with regional prevent coordinator	Annual  Quarterly  Three years  Annual
Learners	Safeguarding & Prevent	During enrolment and then ongoing throughout programme
Employers	Legal requirements  H&S/Risk assessment	In line with legislation Annual/6 month/Quarterly based on risk

Implementation of the policy will be monitored via our Breath HR systems and Staff Training Matrix which compliments other procedures such as standardisation meetings, team meetings, briefings and updates. These strategies will enable employees to implement the policy by using examples, scenarios and external training to ensure all staff are aware of how to implement.

Additional one off training via external experts to enhance understanding of key areas and deepen engagement in core topics.

### Welfare, Health and Safety

All users of Ginger Nut Training services must be made aware of the welfare, health and safety requirements and be prepared to abide by them. Please refer to our full Health and Safety Policy.

## Code of Conduct for Staff

All staff must be familiar with Ginger Nut Training's Professional Code of Conduct for Staff which is provided to all staff on appointment and is available with all other policies and procedures.

### IT Security and Monitoring

In line with internal policies all staff are prohibited from using any company equipment to access any sites that include materials that are obscene, pornographic or otherwise offensive, or any other site that may host inappropriate content.

### Prevent

The Counter Terrorism and Security places a legal duty on us to have "due regard to the need to prevent people from being drawn into terrorism". Guidance is issued under Section 29 of the Act which we follow. We ensure staff have undertaken training in the Prevent Duty as identified by management and are aware of when it is appropriate to refer concerns about learners to the Prevent officer. We ensure staff exemplify British values of "democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs" into our practice. All are staff are trained in their responsibilities within Prevent and we follow a strict internal process of referrals as and when appropriate. Where any staff member is made aware or believes that someone is vulnerable to being exploited or radicalised, they must use the established safeguarding or duty of care procedures within our organisation to escalate your concerns to the appropriate leads, who can raise concerns to Channel if appropriate.

British values are defined as democracy, rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. The Prevent duty also reminds providers of the need to promote the Equality duty to learners. This gives tutors a chance to explore how the British values apply to learners' lives and work. This might relate to how we achieve change in British society through democracy; employment and health and safety laws which protect us all at work; the extent of our liberty in this country and the need to respect others' faith or atheism.



Compliance with the Prevent duty is a requirement for all providers but full engagement with the Duty gives us an opportunity to explore important issues with learners and to give them a chance to consider how British values are relevant to their lives.

There are FIVE British Values which are:

- Democracy
- Rule of Law
- Individual Liberty
- Mutual respect
- Tolerance of those with different faiths and beliefs

## Teaching

Ginger Nut Training strives to deliver good teaching that embeds safeguarding and prevent to build resilience. Our key approaches are:

- A learner centred approach promoting a connection through good teaching
- Equip learners with skills, knowledge and understanding
- Facilitate safe environments for dialogue and critical thinking

Ginger Nut delivery staff will embed safeguarding, wellbeing, prevent, British values, radicalisation and extremism throughout the learner's programme. Learners have access to online learning that will stretch, challenge and encourage critical thinking skills, and ultimately, have relevance.

Ginger Nut Training have an annual teaching calendar – which is agreed between tutors and safeguarding leads and managed by the admin team. This includes monthly webinars, covering all areas of safeguarding, prevent and wellbeing, alongside monthly quizzes and announcements, and supporting resources.

## Learners

Ginger Nut Training provide Safeguarding and Prevent at Induction and will make the learners aware of the Safeguarding Lead within Ginger Nut Training. Learners will be made aware of:

- Employer Safeguarding and Prevent Policy and Procedure
- How to report
- Risks under Prevent to themselves and others
- How to spot the signs of potential risks
- Healthy debate and critical thinking
- Understand and respect different opinions



- British Values
- Understand the dangers of radicalisation and extremism

Following induction, all learners will participate in regular Safeguarding/prevent activities that are embedded into their programme.

### Learners responsibility

- Attend work and training as agreed
- Advise the employer of sickness or absence and their tutor when appropriate
- Agree annual leave with their employer and advise their tutor
- Contact apprenticeship support tutor immediately if employment ceases or changes

### Employers

Ginger Nut Training aim to collaborate with employers to encourage them to promote and highlight safeguarding and prevent to all its employees. We aim to:

- Review policy and procedures to ensure that it encompasses how the employer will manage young apprentices. For example, a mentor, buddy system etc.
- Risk assessments to take into account young apprentices and to put in place any support required such as a buddy / mentor/ training etc
- Review policy and procedures to ensure that it encompasses how the employer will manage young apprentices. For example, a mentor, buddy system etc.
- Risk assessments to take into account young apprentices and to put in place any support required such as a buddy / mentor/ training etc
- Supervision arrangements for young apprentices to ensure that employers had adequate provision for young apprentices
- Promote up to date training either with Ginger Nut Training through e-learning / workshops or signposting employers to other alternative providers / e-learning opportunities
- Signposting to help lines / charities etc.
- HSE guidance on young people/apprentices at work  
<http://www.hse.gov.uk/youngpeople/law/index.htm>  
[http://m.acas.org.uk/media/pdf/0/i/Employing\\_younger\\_workers\\_Nov.pdf](http://m.acas.org.uk/media/pdf/0/i/Employing_younger_workers_Nov.pdf)

If, at any time, a Ginger Nut Employer is not engaging or following current Health and Safety / legal requirements when employing an apprentice, Ginger Nut Training will take appropriate action by liaising first with the employer and agreeing an action plan. Failure to comply will result in Ginger Nut Training reporting the Employer to the appropriate government departments.

