

### Safeguarding & Prevent Policy

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## Safeguarding Policy Statement

Ginger Nut recognise our statutory responsibility to safeguard and promote the welfare of all learners. Safeguarding is everybody's responsibility and all those directly connected (staff, volunteers, governors, leaders, parents, families) are an important part of the wider safeguarding system for children and have an essential role to play in making this community safe and secure.

Ginger Nut believe that the best interests of learners always come first. All learners (defined as those up to the age of 18 and vulnerable adults) have a right to be heard and to have their wishes and feelings taken into account and all learners regardless of age, gender, ability, culture, race, language, religion or sexual identity or orientation, have equal rights to protection.

Staff working with learners at Ginger Nut will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a learner, staff will always act in the best interests of the learner and if any member of our community has a safeguarding concern about any child or adult, they should act and act immediately.

Ginger Nut recognises the importance of providing an ethos and environment within our setting that will help learners to be safe and to feel safe. In our setting learners are respected and are encouraged to talk openly. We will ensure learner's wishes and feelings are taken into account when determining what safeguarding action to take and what services to provide.

Our core safeguarding principles are:

- **Prevention:** positive, supportive, safe culture, curriculum and pastoral opportunities for learners, safer recruitment procedures.
- **Protection:** following the agreed procedures, ensuring all staff are trained and supported to recognise and respond appropriately and sensitively to safeguarding concerns.
- **Support:** for all learners, parents and staff, and where appropriate specific interventions are required for those who may be at risk of harm.
- **Collaborating with parents and other agencies:** to ensure timely, appropriate communications and actions are undertaken when safeguarding concerns arise.

The procedures contained in this policy apply to all staff, including governors, temporary or third-party agency staff and volunteers, and are consistent with those outlined within KCSIE 2022.



## Understanding Safeguarding

Ginger Nut Training has a statutory and moral duty to ensure that we function with a view to safeguarding and promoting the welfare of learners receiving education and training. Throughout these policies and procedures, reference is made to 'learners'. This term is used to mean 'all children under 18 and vulnerable adults'. 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.

Ginger Nut is committed to the safeguarding and well-being of all of our learners and fully recognises its responsibilities for protecting vulnerable groups. Our Policy applies to all staff, learners, employers, visitors, contractors and volunteers working on behalf of or in conjunction with Ginger Nut.

The company is committed to ensuring that we:

- Provide a safe environment for learners to learn in.
- Identifies learners who are suffering or are likely to suffer significant harm.
- Take appropriate action to see that such learners 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 learners and the promotion of a safe environment for the learners learning.
  - Aiding the identification of learners 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 (DfE), 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:

- Protection of Freedoms Act (2012)
- Data Protection Act (2018) & The General Data Protection Regulation (GDPR) (2018)
- Information sharing - Advice for practitioners providing safeguarding services to children, young people, parents and carers (July 2018)
- Working Together to Safeguard Children (September 2018)
- Children Act (2004)
- Children and Families Act (2014)
- Keeping Children Safe in Education (September 2022)
- Children and Social Work Act (2017)
- Safeguarding Vulnerable Groups Act SVGA (2006 amended in 2012)
- Disclosure and Barring Service Code of Practice (November 2015)
- Sexual Offences Act (2003)
- Sexual Violence and Sexual Harassment Between Children in Schools and Colleges (May 2018)
- Equality Act (2010)
- Counter Terrorism and Security Act (2015)
- CONTEST - The United Kingdom's Strategy for Countering Terrorism June 2018
- Channel: Protecting vulnerable people from being drawn into terrorism (2015)
- Revised Prevent Duty Guidance for England and Wales (2015) Revised March 2016
- Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015)
- Education and Training (Welfare of Children) Act 2021

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

The **Definition** of an **adult** at risk: Aged 18 years or over; Who may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be

unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

The definition of regulated activity as explained within the Protection of Freedoms Act 2012 identifies the activities provided to any adult which, if any adult requires them, will mean that the adult will be considered 'vulnerable' at that particular time.

All staff working with learners will receive training adequate to familiarise themselves with safeguarding issues and the professional responsibilities, roles and duties to follow which are outlined within we policy and procedures. Updates to 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 safeguarding with support from other members of staff with specific safeguarding responsibility. Please see the safeguarding team outline on page 1.

## Roles and Responsibilities

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 Staff Code of Conduct within our handbook located on Ginger Nut Training Shared Drive. All Ginger Nut 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 as well as non-vulnerable adults issues within Ginger Nut will liaise directly with the appropriate internal and external contacts, 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 learners 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 is committed to training all tutors to an Advanced Safeguarding Level, every 2 years, to ensure they have a robust level of awareness of Safeguarding.

It is incumbent on all staff to be aware of their Safeguarding Responsibilities and to act accordingly, at all times, which are referenced in this policy, and the Code of Conduct in the Staff Handbook.

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.

## 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	Designated Safeguarding Lead training	Two years
	Prevent – 2 day	Three years
	Enhanced Online safeguarding and prevent training modules	Annual
	Prevent – core topic updates with regional prevent coordinator	Annual
Deputy Safeguarding Lead	Designated Safeguarding Lead training	Two years
	Prevent – 2 day	Three years
	Enhanced Online safeguarding and prevent training modules	Annual
	Prevent – core topic updates with regional prevent coordinator	Annual
Delivery and admin staff	Standard Online safeguarding and prevent training modules	Annual
	CPD – internal and external	Quarterly
	Safer recruitment – admin supporting with recruitment	Three years
	Prevent – core topic updates with regional prevent coordinator	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.

### 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
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- 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.

## Definitions vulnerability, abuse and neglect

Young/vulnerable learners are defined as any learner who has not yet reached their 18<sup>th</sup> birthday (Children Act 2004).

### What staff should look out for:

Any child may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who:

- Is disabled and has specific additional needs
- Has special educational needs (whether or not they have a statutory Education and Health Care Plan)
- Is a young carer
- Is showing signs of being drawn in to anti-social or criminal behaviour, including serious violence, gang involvement and association with organised crime groups
- Is frequently missing/goes missing from care or from home
- Is at risk of modern slavery, trafficking or exploitation
- Is at risk of being radicalised or exploited
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol themselves
- Has returned home to their family from care
- Is a privately fostered child

The **Definition** of an **adult** at risk: Aged 18 years or over; Who may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

The definition of regulated activity as explained within the Protection of Freedoms Act 2012 identifies the activities provided to any adult which, if any adult requires them, will mean that the adult will be considered 'vulnerable' at that particular time.

Child abuse and neglect' is a generic term encompassing all ill treatment of young and vulnerable learners, including serious physical and sexual assaults, as well as cases where the standard of care does not adequately support the persons health or development.

Abuse and neglect are forms of maltreatment of a young or vulnerable learner. Somebody may abuse a young or vulnerable learner by inflicting harm, or by failing to prevent harm.

Young and vulnerable learners may be abused in the family or an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). An adult or adults and another child or children may abuse them. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children (Child on child abuse)

*Keeping Children Safe in Education (September 2022)* sets out definitions and examples of the four broad categories of abuse:

- Physical Abuse
- Emotional Abuse
- Sexual Abuse
- Neglect

### Physical abuse

Is a form of abuse which 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 fabricates the symptoms of, or deliberately induces, illness.

### Emotional Abuse

The persistent emotional maltreatment of a young person such as to cause severe and adverse effects on their emotional development. It may involve conveying that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving them opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on them. These may include interactions that are beyond the young persons developmental capability, as well as overprotection and limitation of exploration and learning, or preventing them participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber-bullying), causing the person frequently to feel frightened or in danger, or the exploitation or corruption of persons. Some level of emotional abuse is involved in all types of maltreatment of a person, though it may occur alone.

### Sexual Abuse

Involves forcing or enticing a young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the young person is aware of what is happening. The activities may involve physical contact, including penetrative (for example rape or oral sex) and non-penetrative acts such as masturbation, kissing, rubbing and touching

outside of clothing. They may also include non-contact activities, such as involving them in looking at, or in the production of, sexual images, watching sexual activities, encouraging them to behave in sexually inappropriate ways, or grooming a person in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other young people.

## Neglect

The persistent failure to meet a young person's basic physical and/or psychological needs, likely to result in the serious impairment of their health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food and clothing, shelter including exclusion from home and abandonment; failing to protect a person from physical and emotional harm or danger; failure to ensure adequate supervision, including the use of inadequate care-givers or failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to a young person's basic emotional needs.

## Specific Safeguarding Issues

### Prevent

The Counter Terrorism and Security Act, 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 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

### Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

### Child on child Abuse including bullying, sexual violence and sexual harassment

**All** staff should be aware that safeguarding issues can manifest themselves via child-on-child abuse. This is most likely to include, but may not be limited to:

- bullying (including cyberbullying)



- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence, such as rape, assault by penetration and sexual assault;(this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Upskirting, which typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).
- abuse in intimate personal relationships between peers
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery)

All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

**All** staff should be clear on Ginger Nut’s policy and procedures with regards to child-on-child abuse and in particular DSLs must know what action to take (See Ginger Nut’s Behaviour Policy).

All staff should understand, that even if there are no Safeguarding reports it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have **any** concerns regarding child-on-child abuse they should speak to their DSL.

It is essential that **all** staff understand the importance of challenging inappropriate behaviours between peers that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.



## Serious Violence

All staff should be aware of indicators, which may signify that children are at risk from or are involved with serious violent crime. All staff should be aware of associated risks and understand the measures in place to manage these and in particular DSLs must know what action to take. Guidance is provided in the Home Office publications **Preventing Youth Violence and Gang Involvement:**

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/418131/Preventing\\_youth\\_violence\\_and\\_gang\\_involvement\\_v3\\_March2015.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/418131/Preventing_youth_violence_and_gang_involvement_v3_March2015.pdf)

and **Criminal Exploitation of Children and Vulnerable Adults: County Lines:**  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/741194/HOCountyLinesGuidanceSept2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/741194/HOCountyLinesGuidanceSept2018.pdf)

## Female Genital Mutilation

Whilst all staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

## Mental Health

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy and speaking to the designated safeguarding lead or a deputy.

The Department for Education has published advice and guidance on [Preventing and Tackling Bullying](#), and [Mental Health and Behaviour in Schools](#) (which may also be useful for colleges). In addition, Public Health England has produced a range of resources to support secondary

school teachers to promote positive health, wellbeing and resilience among young people including its guidance [Promoting children and young people's emotional health and wellbeing](#). Its resources include social media, forming positive relationships, smoking and alcohol. See [Rise Above](#) for links to all materials and lesson plans.

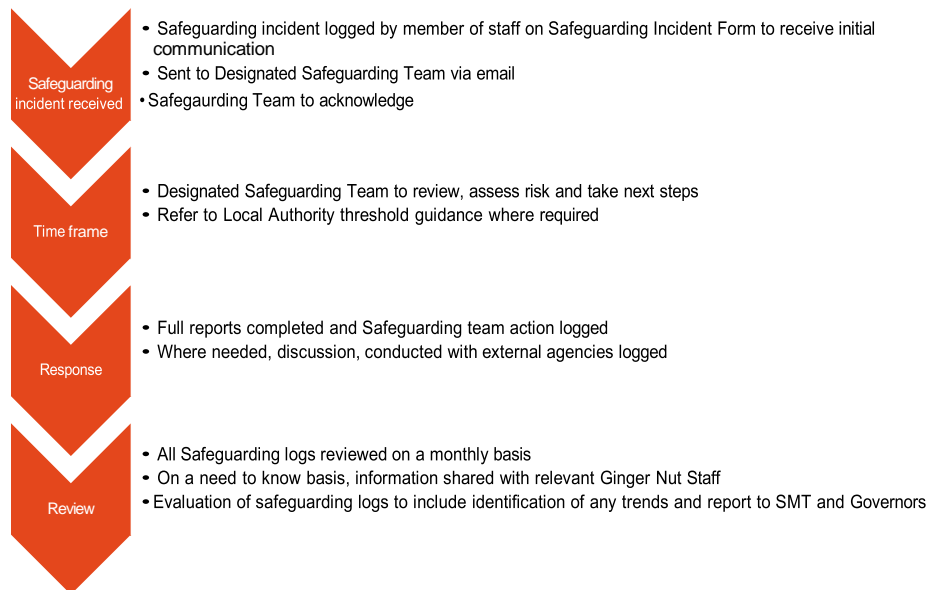
## Procedure to follow – disclosure / concern of abuse

If staff have any safeguarding or prevent concerns related to a learner then they should complete a Safeguarding incident form within 24 hours (located in Shared Drive) and immediately pass it to the safeguarding and/or deputy lead via Ginger Nut email for non-urgent incidences. For urgent referrals, these would be communicated verbally to either Ginger Nut Safeguarding team or relevant agencies. If the safeguarding team are 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 Leads:
  - Tanya Murphy - 07921 814 310
  - Katy Forrest - 07367 140942
- Director – Dan Williams - 07834 554 379

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

Flowchart below



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.

## Safer Recruitment

We have processes in place to check the suitability of staff and learners working directly with learners (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.

Ginger Nut is committed to ensure that we develop a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with our learners and staff.

- Ginger Nut will follow relevant guidance in Keeping Children Safe in Education 2022 (Part Three, 'Safer Recruitment') and from The Disclosure and Barring Service (DBS)
- The governing body and leadership team are responsible for ensuring that Ginger Nut follows safe recruitment processes as outlined within guidance.
- The governing body will ensure that at least one of the persons who conducts an interview has completed safer recruitment training.

Ginger Nut maintains an accurate Single Central Record (SCR) in line with statutory guidance.

We advise all staff to disclose any reason that may affect their suitability to work with learners including convictions, cautions, court orders, reprimands, and warnings.

## Safer Working Practice

All staff must be familiar with Ginger Nut Training's Code of conduct within the staff handbook which is provided to all staff on appointment and is available with all other policies and procedures.

The DSL will ensure that all staff and volunteers (including agency and third-party staff) have read our safeguarding policy and are aware of the Ginger Nut expectations regarding safe and professional practice via the staff handbook.

All staff will be made aware of the professional risks associated with the use of social media and electronic communication (such as email, mobile phones, texting, social networking). Staff will adhere to relevant Ginger Nut policies including staff behaviour policy, mobile and smart technology, Acceptable Use Policies (AUPs), and social media.

## Management of allegations against staff

Any concerns or allegations about staff will be recorded and dealt with appropriately in line with national (Part four of KCSIE 2022) and the ESCP arrangements. In depth information can be found within our 'Managing Allegations against Staff procedure' and our code of conduct, located in the staff handbook.

Any concerns or allegations about staff will be recorded and dealt with appropriately in line with national (Part four of KCSIE) and local guidance. Ensuring concerns are dealt with effectively will protect those working in or on behalf of Ginger Nut from potential false allegations or misunderstandings.

Where the Director is unsure how to respond, for example if there is uncertainty if a concern meets the harm 'thresholds', advice will be sought via the Local Authority Designated Officer (LADO) or the PiPOT (persons in positions of trust advisor).

In all cases where allegations are made against staff or low-level concerns are reported, once proceedings have been concluded, the Director (and if they have been involved the LADO) will consider the facts and determine whether any lessons can be learned and if any improvements can be made.

#### Concerns that meet the 'harm threshold'

Ginger Nut recognises that it is possible for any member of staff, including volunteers, governors, contractors, agency and third-party staff and visitors to behave in a way that indicates a person will pose a risk of harm if they continue to work in their present position, or in any capacity with a learner. This includes when someone has:

- behaved in a way that has harmed a child, or may have harmed a child
- possibly committed a criminal offence against or related to a child
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

The above threshold will be considered for all learners regardless of age.

Allegations against staff which meet this threshold will be responded to and managed in line with part four of KCSIE. Allegations that meet the harm threshold will be referred immediately to the Director who will contact the LADO to agree further action to be taken in respect of the child and staff member. In the event of allegations of abuse being made against the Director, staff are advised that allegations should be reported to the chair of governors who will contact the LADO.

#### Concerns that do not meet the 'harm threshold'

Ginger Nut may also need to take action in response to 'low-level' concerns about staff. Additional information regarding low-level concerns is contained with our code of conduct – this includes what a low-level concern is, the importance of sharing them and the confidential procedure to follow when sharing them.

- Ginger Nut has an open and transparent culture, where possible, in which all concerns about all adults working in or on behalf of the organisation are dealt with promptly and appropriately; this enables us to identify inappropriate, problematic or concerning behaviour early, minimise the risk of abuse and ensure that adults working in or on behalf of Ginger Nut are clear about and act within appropriate professional boundaries, and in accordance with our ethos and values.
- A 'low-level' concern does not mean that it is insignificant; a low-level concern is any concern that an adult working in or on behalf of Ginger Nut may have acted in a way that is inconsistent with our code of conduct, including inappropriate conduct outside of work and does not meet the 'harm threshold' or is otherwise not serious enough to consider a referral to the LADO.
- Low-level concerns may arise in several ways and from several sources. For example, suspicion, complaints, or allegations made by a learner, parent, or other adult within or outside of the organisation, or as a result of vetting checks.

It is crucial that all low-level concerns are shared responsibly, recorded and dealt with appropriately to protect staff from becoming the subject of potential false low-level concerns or misunderstandings.

Low-level concerns should be shared confidentially in line with our low levels concerns policy/staff behaviour policy/code of conduct to the Centre Manager.

Where low-level concerns are reported to managers, the Director will be informed of all low level concerns and is the ultimate decision maker in respect of the response to all low-level concerns.

- Low-level concerns shared about supply staff and contractors will be shared with their employers so any potential patterns of inappropriate behaviour can be identified.
- If there is in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, we will consult with the LADO.

Low-level concerns will be recorded in writing and reviewed so potential patterns of concerning, problematic or inappropriate behaviour can be identified.

- Records will be kept confidential and will be held securely and retained and in compliance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) and other relevant policies and procedures (for example data retention policies).
- Where a pattern is identified, appropriate action will be implemented, for example consulting LADO and following our disciplinary procedures.



## 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 located on Breath HR.

## 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.

If online abuse occurs, we will respond to it by:

- having clear and robust safeguarding procedures in place for responding to abuse (including online abuse)
- providing support and training for all staff and volunteers on dealing with all forms of abuse, including bullying or cyberbullying, emotional abuse, sexting, sexual abuse and sexual exploitation
- making sure our response takes the needs of the person experiencing abuse, any bystanders and our organisation as a whole into account
- reviewing the plan developed to address online abuse at regular intervals, in order to ensure that any problems have been resolved in the long term.