

Ginger Nut Training.



Document Title

Safeguarding and Prevent

Originator

Quality and Compliance

Responsible Person

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Date of Approval

April 2026

Policy Due for Renewal

September 2026

Version

6.2

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1. Safeguarding Policy Statement

Ginger Nut Training is fully committed to safeguarding and promoting the welfare of all learners. Safeguarding is everyone's responsibility. All staff, regardless of role, have a duty to act in the best interests of learners at all times.

Safeguarding encompasses both the prevention of harm and the protection of children, young people and adults at risk. Child protection refers specifically to the activity undertaken to protect children who are suffering, or are likely to suffer, significant harm.

We recognise that safeguarding is not limited to children under 18. Our responsibilities extend to apprentices aged 18–24, care-experienced young adults, and adults at risk who may require additional support due to vulnerability, lived experience or contextual factors.

Ginger Nut Training operates a culture of vigilance where staff maintain an attitude of "it could happen here". Concerns are taken seriously, acted upon immediately, and never dismissed.

We are committed to:

- Creating a safe, inclusive and respectful environment where learners feel secure and able to speak openly
- Ensuring the voice of the learner is heard, recorded and informs decision-making
- Identifying concerns early and providing appropriate early help
- Taking immediate action where there is risk of harm
- Working effectively with external safeguarding partners
- Maintaining robust systems for reporting, recording and responding to concerns

All safeguarding arrangements are in line with statutory guidance including Keeping Children Safe in Education (2025), Working Together to Safeguard Children (2024), the Prevent Duty, the Care Act (2014), and Ofsted's Education Inspection Framework (2025).

All staff must read and understand Part 1 and Annex B of Keeping Children Safe in Education (2025).

2. Reporting concerns for learners and Ginger Nut staff

All staff must report safeguarding concerns immediately. Concerns must never be delayed, dismissed or left unresolved.

Concerns must be reported via the Safeguarding Incident Report Form and escalated verbally to the Designated Safeguarding Lead (DSL) or Deputy DSL where the concern is urgent.

In cases of immediate risk or danger, staff must contact the Police or relevant emergency services without delay.

Staff must not assume that someone else will take action. Every concern must be reported.

Where the DSL or safeguarding team is unavailable, staff must escalate concerns directly to external safeguarding agencies. This may include:

- Children's Social Care
- Adult Social Care
- Police

- Local Authority Designated Officer (LADO)
- Prevent/Channel Panel

Staff must not delay referral due to internal processes or availability of safeguarding leads.

Information sharing is essential for safeguarding. Information must be shared:

- Immediately where there is risk of harm
- Without consent where necessary to protect a learner
- In line with statutory guidance and data protection legislation

Staff should explain to learners what information will be shared and why, unless doing so would increase risk.

Accurate, timely and secure records must be maintained for all safeguarding concerns.

If staff have any safeguarding or prevent concerns related to a learner, then they should complete the online Safeguarding Incident Report Form. This will immediately generate a report that is sent to the safeguarding team via the Ginger Nut Training email: safe@gingernuttraining.co.uk for non-urgent incidents.

For urgent referrals, these would be communicated verbally to either the 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.

Process for reporting safeguarding reports for learners.



2.1 Safeguarding Notifications to DfE

Where a safeguarding concern or allegation is referred to local authority children’s social care, adult social care, or the police, the organisation will notify the Department for Education within 24 hours.

This notification will be made by the Designated Safeguarding Lead (or nominated deputy) and will include:

- Provider name
- A high-level summary of the incident (no personal data)
- Confirmation of whether the matter is under investigation

3. Process for reporting safeguarding concerns for Ginger Nut staff

If a concern or allegation is received related to a member of staff, then please follow the procedures below.

Process

1. Staff members with concern for self or others, contact the Designated Safeguarding Lead (DSL) for Staff (Centre Manager) in the first instance as soon as possible. In Centre Manager absence it will be Senior Administrator.

2. DSL to arrange confidential meetings with staff members.
3. DSL completes documentation and records and stores in confidential area.
4. DSL to monitor staff in line with agreements made on an individual basis.
5. Any signposting to external agencies will be agreed and arranged.

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.

4. Understanding Safeguarding

4.1 Definition

Ginger Nut Training has a statutory and moral duty to safeguard and promote the welfare of all learners. Safeguarding is everyone's responsibility and is central to all aspects of the organisation's culture, practice and decision-making.

Safeguarding encompasses both prevention of harm and protection from harm. Child protection refers specifically to the activity undertaken to protect children who are suffering, or are likely to suffer, significant harm.

Throughout this policy, the term 'learners' refers to children under the age of 18 and adults who may be considered vulnerable or at risk. Ginger Nut Training recognises that some adults are at increased risk of abuse or harm and, where appropriate, safeguarding procedures will be applied with necessary adaptations. Adults at risk have the same rights to protection and support as children.

In line with Ofsted's Education Inspection Framework, Ginger Nut Training adopts a contextual and inclusive approach to safeguarding. Safeguarding responsibilities extend beyond those formally defined as vulnerable and include learners who may experience increased risk due to reduced protective factors within further education and apprenticeship contexts.

This includes, where relevant:

- Apprentices aged 18 to 24
- Care-experienced young adults
- Adults with complex or intersecting vulnerabilities

These vulnerabilities may include mental ill health, exploitation, domestic abuse, substance misuse, homelessness, offending histories, digital harm, coercive control, or unsafe living arrangements.

Ginger Nut Training adopts a contextual safeguarding approach, recognising that risks may arise beyond the home, including within workplaces, online environments, peer relationships and community settings. Safeguarding assessments and interventions will take account of these wider contexts.

This policy applies to all staff, learners, employers, visitors, contractors and volunteers working on behalf of Ginger Nut Training.

The organisation ensures that:

- Safeguarding arrangements are effective, proportionate and responsive to local and national risks
- A strong safeguarding culture is maintained, where learners feel safe, listened to and able to report concerns

- Staff demonstrate vigilance, professional curiosity and confidence in identifying and responding to concerns
- Learners are supported to understand risk and develop the knowledge and skills needed to stay safe

4.2 Early Help and Intervention

Ginger Nut Training is committed to early identification and intervention to prevent escalation of safeguarding concerns.

Early help refers to support provided to learners who may be vulnerable or experiencing difficulties but are not currently at risk of significant harm.

Staff must be alert to learners who may benefit from early help. Indicators may include:

- Changes in behaviour, attendance or engagement
- Emerging mental health or emotional wellbeing concerns
- Family, social or financial difficulties
- Patterns of low-level concern or vulnerability

All early help concerns must be reported to the safeguarding team. Staff must not attempt to manage concerns independently.

The Designated Safeguarding Lead (DSL) will determine the appropriate response, which may include:

- Internal pastoral or wellbeing support
- Employer engagement or workplace intervention
- Signposting to external services
- Referral to local authority early help services

All early help interventions will be recorded, monitored and reviewed. Where risk increases or new information emerges, concerns will be escalated and managed under safeguarding procedures.

Early help does not replace safeguarding. Where there is any risk of harm, safeguarding procedures must be followed immediately.

4.3 Legislative Framework

Ginger Nut Training operates in accordance with current safeguarding legislation and statutory guidance, including but not limited to:

- Protection of Freedoms Act (2012)
- Data Protection Act (2018) and UK GDPR
- Information Sharing Advice (2024)
- Working Together to Safeguard Children (2024)
- Children Act (1989 & 2004)
- Children and Families Act (2014)
- Care Act (2014)
- Keeping Children Safe in Education (2025)
- Children and Social Work Act (2017)
- Safeguarding Vulnerable Groups Act (2006, amended 2012)
- Disclosure and Barring Service Code of Practice (2015)
- Sexual Offences Act (2003)
- Equality Act (2010)

- Counter Terrorism and Security Act (2015)
- CONTEST Strategy (2023)
- Channel Guidance (2015)
- Prevent Duty Guidance (2015, revised 2016)
- Female Genital Mutilation Act (2003, as amended)
- Education and Training (Welfare of Children) Act (2021)

A child is defined as any person under the age of 18.

An adult at risk is defined as a person aged 18 or over who:

- Has care and support needs
- Is experiencing, or at risk of, abuse or neglect
- Is unable to protect themselves due to those needs

4.4 Safeguarding Responsibilities

All staff working with learners will receive safeguarding training appropriate to their role and responsibilities. Training will be provided at induction and updated regularly in line with statutory guidance and emerging risks.

A senior member of the management team holds overall responsibility for safeguarding, supported by the Designated Safeguarding Lead (DSL) and safeguarding team.

Staff are expected to:

- Understand their safeguarding responsibilities
- Recognise signs of abuse, neglect and exploitation
- Act immediately on concerns
- Follow reporting procedures without delay

4.5 Distinction Between Safeguarding and Wellbeing Concerns

Safeguarding concerns relate to situations where a learner may be at risk of harm. This includes abuse, neglect, exploitation, radicalisation, criminal activity or any situation where there is a risk of significant harm. Safeguarding concerns require immediate reporting and may require referral to external agencies.

Wellbeing concerns relate to a learner's general emotional, mental or social welfare where there is no immediate risk of harm. These concerns may be supported through early help, pastoral intervention, employer engagement or internal support mechanisms.

Staff must always treat a concern as safeguarding where:

- There is any indication of harm or risk of harm
- The situation is unclear or uncertain
- There is a pattern of concern or escalation
- The learner's vulnerability increases risk

Where there is doubt, staff must always escalate as a safeguarding concern. It is not the role of staff to investigate or determine thresholds of harm.

The Designated Safeguarding Lead (DSL) is responsible for determining thresholds and whether external referral is required.

5. Roles and responsibilities

All staff and learners are required to take shared responsibility for the safeguarding and safety of any children, young people and adults at risk 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 interact with learners, young people and adults at risk visiting.

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

The Directors have nominated the Designated Safeguarding Lead as the senior member of staff responsible for child and vulnerable adult safeguarding within Ginger Nut Training. Additionally, an Internal Safeguarding Lead has been appointed to handle safeguarding issues related to internal employees. Both roles will liaise directly with the appropriate internal and external contacts, as deemed necessary.

This structure ensures that all safeguarding concerns are addressed appropriately while maintaining clear lines of responsibility and confidentiality.

Additionally, the Designated 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.
- The Designated Safeguarding Lead (DSL) will provide quarterly safeguarding reports to the Board/Directors. These reports will include safeguarding trends, Prevent cases, missed session patterns, mental health indicators, themes from low-level concerns, and training compliance. This supports effective governance oversight in line with Ofsted expectations for Leadership and Governance.
- All safeguarding cases will be RAG rated and managed accordingly, with risk, escalation and oversight applied in line with statutory guidance, internal safeguarding procedures and current Ofsted expectations.
- RAG ratings will be reviewed regularly and updated where risk changes, new information emerges, or escalation is required. Summary analysis of case themes, numbers, trends, escalation activity and high-risk concerns will inform monthly and quarterly reporting to Directors.
- Ensuring the voice of the learner is recorded and considered in safeguarding decision-making and case planning wherever appropriate.
- Supporting multi-agency working and ensuring external referrals are made promptly where thresholds are met.

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.

Staff are expected to demonstrate professional curiosity, respectfully questioning and exploring concerns to better understand a learner's circumstances, presentation and level of

risk.

6. Whistleblowing

All staff must feel able to raise concerns about poor or unsafe safeguarding practice, failures in leadership response, or behaviour by staff, volunteers, contractors, governors, directors, or visitors that may pose a risk to learners. Concerns should normally be raised with the Designated Safeguarding Lead, Deputy DSL, Centre Manager or Director responsible for safeguarding.

Where the concern relates to a senior leader, the DSL, or where a member of staff believes concerns are not being taken seriously, they may escalate directly to the Local Authority Designated Officer (LADO), children’s social care, the police, the Prevent team, the ESFA, Ofsted or another appropriate external agency. No member of staff will suffer detriment for raising a genuine safeguarding concern in good faith.

All staff should understand that safeguarding concerns must be escalated without delay where thresholds are met, and that internal processes must not prevent or delay appropriate external referral.

7. 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 - Level 3 Designated Safeguarding Lead	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- Level 3 Designated Safeguarding Lead	Annual
	Safer recruitment	Annual
	Prevent – core topic updates with regional prevent coordinator	Annual

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
Deputy Safeguarding Lead	Designated Safeguarding Lead training level 3 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

- All staff will receive safeguarding training at induction and this will be regularly updated. Formal safeguarding updates, including online safety, will be provided at least annually, and more frequently where required.
- Training arrangements reflect the expectations of Keeping Children Safe in Education 2025/2026 and are updated in response to emerging risks, legislative change, and local safeguarding priorities.
- Staff briefings and refresher training will include updates on Working Together to Safeguard Children 2026, including multi-agency working, early help, contextual safeguarding, voice of the learner, information sharing, and escalation routes.

8. Safeguarding training and refresher requirements

All staff will complete safeguarding and Prevent training appropriate to their role at induction and through ongoing refresher training. Refresher arrangements will reflect current statutory expectations and organisational risk.

All staff will complete **annual safeguarding refreshers** covering, as a minimum:

- safeguarding and child protection updates
- online safety, filtering and monitoring awareness
- cyber security awareness relevant to safeguarding
- Prevent updates
- harmful sexual behaviour, sexual violence and sexual harassment
- mental health indicators and early intervention
- AI-related risks and emerging online harms
- digital exploitation, including grooming, coercion and image-based abuse
- awareness of Martyn’s Law (Terrorism (Protection of Premises) Act 2025) and relevant protective security expectations
- information sharing expectations, including when consent is not required

- contextual safeguarding in apprenticeship, workplace, peer, home and online settings

The organisation will maintain a central record of safeguarding CPD, refresher completion and role-specific training. Compliance will be monitored through the staff training matrix, CPD logs and line management oversight

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, announcements, and supporting resources.

Learners

Ginger Nut Training provides 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:

- 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
- Work with Ginger Nut Training and relevant safeguarding partners where concerns arise, including contributing to contextual safeguarding assessments relating to workplace risk, attendance, welfare, conduct, supervision and wellbeing.

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.

9. Definitions vulnerability, abuse and neglect (including exploitation)

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

9.1 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
- shows signs of being drawn in to anti-social or criminal behaviour, including serious violence, gang involvement and association with organised crime groups
- frequently missing/goes missing from care or from home or place of employment* (Ginger Nut Training have a missed sessions tracker for Safeguarding monitoring).
- 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
- Are at risk of so-called 'honour'-based abuse, such as Female Genital Mutilation or Forced Marriage
- Domestic violence, including see, hear or experience its effects
- May be experiencing risk in wider contexts such as peer groups, the workplace, online spaces, transport routes, social settings or the local community

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' (including child exploitation) 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 2025) sets out definitions and examples of the four broad categories of abuse:

- Physical Abuse
- Emotional Abuse

- Sexual Abuse
- Neglect
- Child exploitation

9.2 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.

9.3 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 person's 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 levels of emotional abuse is involved in all types of maltreatment of a person, though it may occur alone.

9.4 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). Adult males do not solely perpetrate Sexual abuse. Women can also commit acts of sexual abuse, as can other young people.

9.5 Neglect

Neglect is the persistent failure to meet a young person's basic physical and/or psychological needs, likely to result in serious impairment of their health or development.

Neglect may occur during pregnancy, for example as a result of maternal substance misuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- protect a young person from physical and emotional harm or danger
- ensure adequate supervision, including the use of inappropriate or inadequate caregivers
- ensure access to appropriate medical care or treatment
- Neglect may also include a failure to respond to, or a lack of responsiveness to, a young person's basic emotional needs.

10. Specific Safeguarding Issues

10.1 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 our 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 leaders, who can raise concerns to Channel if appropriate.

Ginger Nut Training recognises that radicalisation risk can present both offline and online. Staff must be alert to emerging risks including AI-generated extremist content, deepfakes, algorithmic radicalisation, encrypted-platform grooming, private-channel influence, and the rapid dissemination of extremist narratives through social and digital media. Training and risk awareness will reflect current DfE guidance on the safe and effective use of generative AI in education and current Prevent expectations for education providers.

Where Prevent concerns arise, staff must also consider contextual factors including workplace influences, peer association, online behaviour, local community risks and patterns of vulnerability that may increase susceptibility to radicalisation.

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. We complete a Prevent Duty self-assessment at least twice annually or following major organisational changes, in line with sector expectations.

10.2 Martyn’s Law (Terrorism Protection of Premises) Act 2025

Ginger Nut Training operates primarily from a single head office, with the majority of staff working remotely and delivering training online. Although our own premises are low-footfall and not open to the public, we recognise our responsibilities under the Terrorism (Protection of Premises) Act 2025 (“Martyn’s Law”) to take proportionate steps to enhance safety and preparedness.

In line with these requirements, Ginger Nut Training will:

- **Assess proportionate terrorism-related risks** relevant to our organisational model, including risks associated with staff travel, remote delivery settings, and small events hosted at our head office.
- **Ensure staff attending external, third-party venues** (e.g., careers fairs, conferences, partner-organised events) understand and follow the host organisation’s security procedures, emergency arrangements, and venue-specific evacuation plans.
- **Ensure external providers** hosting us meet the protective security expectations set out

in Martyn's Law and can demonstrate appropriate preparedness measures.

- **Provide training and guidance** to staff so they can recognise suspicious behaviour, respond safely in an emergency, and follow local venue instructions.
- **Maintain internal risk assessments and incident response procedures**, proportionate to our operational model, and review them regularly as part of our safeguarding, Prevent, and health-and-safety frameworks.

There are FIVE British Values which are:

- a. Democracy
- b. Rule of Law
- c. Individual Liberty
- d. Mutual respect
- e. Tolerance of those with different faiths and beliefs

10.3 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.

10.4 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:

- f. bullying (including cyberbullying)
- g. 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)
- h. 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)
- i. 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

- j. 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).
- k. abuse in intimate personal relationships between peers
 - l. sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
 - m. 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
 - n. 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 Designated Safeguarding Lead.

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.

10.5 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

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

10.6 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.

10.7 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.

11. Safer Recruitment

Ginger Nut Training is committed to safeguarding and promoting the welfare of all learners. Safer recruitment is a key part of this commitment, ensuring that all staff, volunteers and third parties are suitable to work with learners.

Recruitment and selection procedures are carried out in line with statutory guidance, including Keeping Children Safe in Education (KCSIE) 2025. Processes are designed to deter, identify and reject individuals who may pose a risk.

All appropriate pre-employment checks are completed before an individual begins work. These include, where applicable:

- Verification of identity and right to work in the UK
- Enhanced Disclosure and Barring Service (DBS) check
- Children's Barred List check for roles involving regulated activity
- References, employment history and qualification checks
- Prohibition and any other relevant statutory checks

Where a DBS check identifies information, a trained senior member of staff will carry out a risk assessment to determine suitability for the role.

A Single Central Record (SCR) is maintained in accordance with statutory requirements. This record includes all required pre-employment checks, is kept up to date, quality assured, and is available for inspection.

All staff are required to disclose any convictions, cautions, reprimands, warnings or other relevant information that may affect their suitability to work with learners, both at recruitment and during employment. Failure to do so may result in disciplinary action.

Ginger Nut Training ensures that:

At least one member of each interview panel has completed safer recruitment training

Leadership oversight is in place to monitor safer recruitment practices

Appropriate checks, assurances and risk assessments are applied to agency staff, contractors, volunteers and third-party staff

Where working in partnership, assurance is obtained that equivalent safeguarding and recruitment procedures are in place.

Ginger Nut Training promotes a strong safeguarding culture, ensuring that all recruitment practices support the protection of learners from harm.

12. 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 agencies 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.

13. Management of allegations against staff

Ginger Nut Training recognises that safeguarding concerns may arise in relation to staff, volunteers, contractors, governors, agency workers or any individual working on behalf of the organisation. All concerns must be taken seriously, recorded accurately, and responded to promptly in line with statutory guidance, including Keeping Children Safe in Education (KCSIE) and local safeguarding partnership arrangements.

All concerns or allegations will be managed in a way that:

- Protects learners from harm
- Ensures fair and proportionate treatment of staff
- Maintains confidentiality and professionalism
- Supports a culture of openness, transparency and accountability

In-depth procedures are set out in the organisation's 'Managing Allegations Against Staff' procedure and Staff Code of Conduct.

Where there is uncertainty about how to respond, including whether a concern meets the harm threshold, advice must be sought immediately from the Local Authority Designated Officer (LADO) or, where appropriate, the PiPOT (Persons in Positions of Trust advisor). Internal processes must not delay consultation with external safeguarding partners.

Following the conclusion of any case, the Director (and LADO where involved) will review the circumstances to identify any lessons learned, required improvements, or changes to practice, policy or training.

13.1 Concerns that Meet the Harm Threshold

Ginger Nut Training recognises that any adult working with learners may pose a risk of harm. Allegations that meet the harm threshold must be treated as child protection concerns and managed in line with KCSIE.

The harm threshold is met where an individual 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 they may pose a risk of harm
- Behaved, or may have behaved, in a way that indicates they may not be suitable to work with children

This threshold applies to all learners, regardless of age.

All allegations that meet the harm threshold must be:

- Reported immediately to the Designated Safeguarding Lead and Director
- Referred to the Local Authority Designated Officer (LADO) within one working day
- Managed in accordance with advice provided by the LADO

No internal investigation will take place prior to consultation with the LADO.

In the event that an allegation is made against the Director, the concern must be reported to the Chair of Governors, who will take responsibility for contacting the LADO.

13.2 Concerns that Do Not Meet the Harm Threshold (Low-Level Concerns)

Ginger Nut Training promotes an open and transparent safeguarding culture in which all concerns about adults working in or on behalf of the organisation are shared, recorded and addressed appropriately.

A low-level concern is any concern that an adult may have acted in a way that:

- Is inconsistent with the Staff Code of Conduct
- Falls below the harm threshold
- Does not meet the criteria for referral to the LADO

Low-level concerns are not insignificant and must always be taken seriously. They are essential in identifying patterns of behaviour, reducing risk, and maintaining professional boundaries.

Low-level concerns may arise from:

- Observations or professional judgement
- Complaints or disclosures from learners, parents or staff
- Concerns identified through vetting or monitoring processes

All low-level concerns must be:

- Shared promptly and confidentially with the Centre Manager in line with internal procedures
- Recorded in writing
- Reviewed and managed appropriately

The Director will be informed of all low-level concerns and holds overall responsibility for determining the appropriate response.

Where concerns relate to agency staff, contractors or third parties, these will be shared with

the individual's employer to support identification of potential patterns of behaviour.

Where there is any doubt about whether a concern meets the harm threshold, advice must be sought from the LADO.

13.3 Recording, Monitoring and Review

All concerns and allegations will be:

- Recorded clearly, accurately and promptly
- Stored securely in line with the Data Protection Act 2018 and UK GDPR
- Treated confidentially and shared on a need-to-know basis

Low-level concerns will be reviewed collectively to:

- Identify patterns or trends
- Detect emerging risks
- Strengthen safeguarding culture and practice

Where patterns of concern are identified, appropriate action will be taken. This may include:

- Escalation to the LADO
- Disciplinary procedures
- Additional training or supervision
- Review of policies and working practices

Effective management of concerns supports both learner safety and staff protection, ensuring that inappropriate behaviour is addressed early and consistently.

14 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.

15 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. Our systems have robust security in place and where appropriate, two-factor authentication.

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.
- Filtering, monitoring and cyber-resilience measures adhere to DfE Cyber Security Standards and DfE Generative AI guidance (2025), ensuring appropriate protection against online harms.

Ginger Nut Training recognises that online harm increasingly intersects with safeguarding risk. Filtering, monitoring, cyber resilience and staff vigilance will take account of emerging threats including AI-enabled impersonation, deepfakes, extremist content generation, sexualised image manipulation, account compromise, grooming through encrypted platforms, and other forms of digital exploitation. Staff training and internal controls will reflect current DfE expectations on filtering, monitoring and the safe use of generative AI in education.

Online safety arrangements will be reviewed regularly to ensure they remain effective against evolving technological risks and align with current DfE filtering and monitoring standards.

15.1 Learner access

Learners do not access any of Ginger Nut Training IT systems, however, at Induction, learners are provided with IT guidance and can attend regular webinars for Online Safety etc. Please refer to the learner induction handbook.

15.2 Recordings

As Ginger Nut Training is an on-line provider, all sessions between learners and tutors will be recorded, as far as possible. Learners do not have to have cameras on for sessions that are being uploaded to external platforms or on group sessions.

However, these are to be the exception, and each case will be reviewed individually at Employer Engagement. Tutors must explain at introduction of the recording as to the reason why camera is off, and these can only be for the exceptional circumstances.

All recordings must be uploaded into Onefile within 24 hours and failure to do so will be regarded as a breach of **this policy and appropriate action will be taken.**

16 Missed Sessions tracker

The safeguarding team will analyse learner missed sessions on a monthly basis. We will be reviewing all learners that have missed 3 consecutive sessions within a certain time span. For example, missing Jan, Feb and March 2025 sessions. If they have missed more than 3 sessions over a 2-year period, this will not necessarily raise any flags but will be taken into consideration.

Any learners in scope we will check Onefile for any comments/indications for missing sessions.

- If there isn't a clear explanation then the team will refer to the tutor/Senior, by email, to ascertain if there are any Safeguarding concerns.
- If any learners in scope do require further support from either the tutor or Safeguarding team, information will then be tracked on the Safeguarding tracker.
- A missed sessions folder is created in the Safeguarding Folder to collate all the analysis.
- Potential safeguarding risk must trigger inter-agency engagement where needed.

Missed-session patterns may indicate neglect, exploitation, mental health concerns, disengagement, domestic abuse, radicalisation, coercive control or other safeguarding

risks. Where thresholds are met, this must trigger timely early help, employer liaison, and inter-agency engagement as appropriate. Patterns and trends will be reviewed through safeguarding meetings and included in quarterly DSL reporting to Directors.

Where appropriate, learner voice, contextual factors and wider safeguarding indicators will also be considered as part of the risk assessment of missed-session patterns.

17 Whole-organisation safeguarding culture

Ginger Nut Training maintains a whole-organisation safeguarding culture. Safeguarding intelligence informs strategic planning, curriculum design, employer engagement, staff development, learner support, risk management, and leadership assurance processes. Safeguarding is not treated as a standalone function; it is embedded within governance, operational decision-making and quality improvement across the organisation.

Version;

Version	Date	Author	Summary of changes
6.2	April 2026	Q&C Lead	Comprehensive safeguarding policy review to align with current Department for Education (DfE) guidance and Ofsted expectations. Updates include: strengthened safeguarding culture and “it could happen here” approach; clearer distinction between safeguarding, child protection, wellbeing and early help; introduction of a structured early help section and intervention process; enhanced reporting procedures with explicit expectation of immediate action and external escalation; clarification of LADO referral requirements (within 1 working day); strengthened management of allegations against staff, including low-level concerns framework; improved online safety, filtering and monitoring expectations; inclusion of emerging risks (AI, digital harm, contextual safeguarding); enhanced learner voice and contextual safeguarding approach; improved clarity, structure and usability for staff under pressure; alignment with Keeping Children Safe in Education (2025) and Working Together to Safeguard Children (2024). Included definition of Wellbeing and Safeguarding.

J Celino

[J Celino \(Apr 27, 2026 16:57:56 GMT+1\)](#)

Dan Williams

[Dan Williams \(Apr 27, 2026 17:03:14 GMT+1\)](#)

Ginger Nut Training - 2026 Safeguarding

Final Audit Report


2026-04-27

Created:	2026-04-27
By:	Ginger Nut Training (delivery@gingernuttraining.co.uk)
Status:	Signed
Transaction ID:	CBJCHBCAABAA0j9gWM8Yyi8RlqplFjcPG_eAxDlt_V1v


"Ginger Nut Training - 2026 Safeguarding" History

 Document created by Ginger Nut Training (delivery@gingernuttraining.co.uk)

2026-04-27 - 3:48:00 PM GMT

 Document emailed to jacqui.celino@gingernuttraining.co.uk for signature


2026-04-27 - 3:48:06 PM GMT

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2026-04-27 - 3:57:39 PM GMT

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2026-04-27 - 3:57:54 PM GMT

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Signature Date: 2026-04-27 - 3:57:56 PM GMT - Time Source: server

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2026-04-27 - 3:57:58 PM GMT

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2026-04-27 - 4:02:57 PM GMT

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2026-04-27 - 4:03:12 PM GMT

 Document e-signed by Dan Williams (dan.williams@gingernut.co.uk)

Signature Date: 2026-04-27 - 4:03:14 PM GMT - Time Source: server

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2026-04-27 - 4:03:14 PM GMT