

Ginger Nut Training.



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Safeguarding and Prevent

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Responsible Person

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1. Safeguarding Policy Statement

Ginger Nut Training recognises its statutory responsibility to safeguard and promote the welfare of all learners. Safeguarding is everybody's responsibility. All those directly connected with Ginger Nut Training, including staff, volunteers, directors, governors, employers, parents, carers and families, form part of the wider safeguarding system for children, young people and adults at risk and play an essential role in creating a safe, secure and inclusive learning culture.

Ginger Nut Training believes that the best interests of learners always come first. All learners have a right to be heard and to have their wishes and feelings considered. We are committed to safeguarding children and young people under the age of 18, apprentices aged 18 to 24 where they may be vulnerable or require additional support, care experienced young adults, and adults at risk or with complex vulnerabilities or support needs. All learners, regardless of age, disability, sex, gender identity, race, religion or belief, sexual orientation, language, culture, care status, background or circumstances, have equal rights to protection.

Staff collaborating with learners at Ginger Nut Training will maintain an attitude of "it could happen here" where safeguarding is concerned. When there are concerns about the welfare of a learner, staff will always act in the best interests of that learner and will act without delay.

Ginger Nut Training recognises the importance of providing an ethos and environment in which learners feel safe, respected, and able to speak openly. We will ensure that learners' wishes and feelings are considered when determining what safeguarding action to take and what services or interventions may be required.

The organisation will ensure that the voice of the learner is actively sought, recorded and considered in safeguarding decisions wherever appropriate. Learners will be supported to express their views, wishes and feelings, and these will inform risk assessment, planning and intervention.

Our core safeguarding principles are:

- Prevention: a positive, supportive and safe culture; effective curriculum and pastoral opportunities; safer recruitment procedures; and early intervention.
- Protection: following agreed procedures and ensuring all staff are trained and supported to identify, respond to and report safeguarding concerns appropriately.
- Support: for all learners, parents, carers and staff, including targeted intervention where individuals may be at risk of harm.
- Partnership working: effective communication and joint working with parents, carers, employers, local authorities and other agencies where safeguarding concerns arise.
- Multi-agency working: recognising that safeguarding is a shared responsibility requiring timely and coordinated action between education, employers, children's social care, adult social care, health services, police, Prevent partners and other relevant agencies.

The procedures in this policy apply to all staff, including directors, governors, agency staff, third-party staff, contractors and volunteers, and are consistent with current statutory guidance including Keeping Children Safe in Education.

This policy is consistent with current statutory guidance and inspection expectations,

including Keeping Children Safe in Education 2026 (effective from 1 September 2026), Working Together to Safeguard Children (as updated), the Prevent duty guidance, the Care Act 2014 and the Further education and skills inspection toolkit used under Ofsted's education inspection framework from November 2025. Safeguarding arrangements are reviewed regularly to ensure they reflect current law, guidance, local procedures and emerging risks. This policy also reflects strengthened expectations around safeguarding culture, leadership accountability, early intervention, inclusion and contextual safeguarding within further education and apprenticeship settings.

2. Reporting concerns for learners and Ginger Nut staff

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.

Staff must report safeguarding concerns immediately using the Safeguarding Incident Report Form and, where required, by direct verbal escalation to the Designated Safeguarding Lead or deputy. Wherever appropriate, staff will explain to the learner what information is being shared, with whom, and why. However, consent is not required where there is a safeguarding concern, risk of harm, risk of significant harm, criminal concern, or where sharing is otherwise necessary to protect a child, young person or adult at risk. Information sharing is essential for effective safeguarding. Staff must not delay sharing information where there is a concern about a learner's safety or wellbeing. Information may be shared without consent where there is a risk of harm or potential harm, where a crime may have been committed, or where sharing is necessary to protect a child, young person or adult at risk. All information sharing will be lawful, proportionate, relevant, accurate, timely and secure, in line with current safeguarding and data protection guidance.

If the Designated Safeguarding Lead (DSL) or deputies are unavailable, or if the concern relates to a member of the safeguarding team, staff must escalate concerns directly to external safeguarding agencies. This may include:

- Local Authority Designated Officer (LADO)
- Local Prevent Team
- Channel Panel (via Prevent referral)
- Children's Social Care or Adult Social Care
- Police (where there is immediate risk or criminal concern)
- DfE counter-extremism reporting route

Emergency situations must always be referred to the Police immediately.

All escalation routes must be clearly visible and accessible to staff. Staff should not delay action due to internal unavailability. Escalation routes must be clearly visible, accessible, and understood by all staff.

Staff must escalate concerns to external agencies where there is a risk of significant harm, where a learner is in immediate danger, or where concerns meet local safeguarding partnership thresholds. The Designated Safeguarding Lead will make referrals in line with

local authority threshold guidance and statutory expectations.

Ginger Nut Training recognises that safeguarding is a multi-agency responsibility. Effective safeguarding requires timely, coordinated action between education providers, employers, local authorities, health services, police and other safeguarding partners. Staff understand their responsibility to escalate concerns appropriately and support joint working to protect learners from harm.

Process for reporting safeguarding reports for learners.



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

Ginger Nut Training has a statutory and moral duty to ensure that it operates with a view to safeguarding and promoting the welfare of all learners receiving education and training. Safeguarding is recognised as everyone's responsibility and is central to all aspects of the organisation's work and culture.

Throughout these policies and procedures, the term 'learners' refers to all children under the age of 18 and adults who may be considered vulnerable. The governing body recognises that some adults are at increased risk of abuse or harm and, accordingly, these procedures may be applied (with appropriate adaptations) to support the protection of vulnerable adults. Vulnerable adults have the same legal rights to protection and support as children.

In line with Ofsted EIF expectations, Ginger Nut Training adopts a contextual and inclusive approach to safeguarding. Safeguarding responsibilities extend beyond those formally defined as vulnerable and include individuals and groups who may experience increased risk or reduced protective factors within further education and apprenticeship contexts. This includes, where relevant, apprentices aged 18 to 24, care-experienced young adults, and adults with complex or intersecting vulnerabilities. These may include individuals affected by 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 in a range of environments beyond the home, including the workplace, online and digital environments, peer relationships, and community settings. Safeguarding assessments and interventions will take account of these wider contexts when identifying and responding to risk.

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

The organisation ensures that:

- Safeguarding arrangements are effective, proportionate, and responsive to local and national risks, including those associated with further education and work-based learning.
- There is a strong safeguarding culture, where learners feel safe, are listened to, and know how to report concerns.
- Staff demonstrate appropriate knowledge, vigilance, and professional curiosity to identify and respond to concerns at the earliest opportunity.
- Learners are supported to understand risks, including those related to online safety, exploitation, radicalisation, and personal well-being, enabling them to stay safe.

Ginger Nut Training is committed to early identification and intervention to prevent escalation of safeguarding concerns. Staff will identify learners who may benefit from early help and will take timely and proportionate action, which may include internal support, employer engagement, signposting, or referral to external services where appropriate. Early help aims to address emerging needs at the earliest opportunity and reduce the need for statutory intervention.

In pursuit of these aims, Ginger Nut Training will approve and annually review policies and procedures to ensure that they:

- Raise awareness of safeguarding and promote a culture of vigilance and accountability.
- Support the effective identification of learners at risk and provide clear, accessible reporting procedures.
- Include robust arrangements for managing allegations against staff, in line with statutory guidance.
- Ensure safer recruitment practices and ongoing safeguarding training that is regularly updated and reflects emerging risks.
- Promote the physical, mental, and emotional well-being of learners and staff, recognising the link between safeguarding and personal development.
- Support effective multi-agency working, timely information sharing and appropriate external referral where safeguarding thresholds are met.

Ginger Nut Training takes into account all relevant safeguarding legislation and statutory guidance, including:

- Protection of Freedoms Act (2012)
- Data Protection Act (2018) & UK GDPR (2018)
- Information Sharing Advice (May 2024)
- Working Together to Safeguard Children (February 2024)
- Children Act (2004)
- Children and Families Act (2014)
- Care Act (2014)
- Keeping Children Safe in Education (September 2026)
- 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) 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 because 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 adequately to familiarise themselves with safeguarding issues and the professional responsibilities, roles and duties to follow which are outlined within the 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 of the 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.

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:

- The Designated Safeguarding Lead (DSL) will provide three quarterly safeguarding monitoring reports and one annual safeguarding report to the Board/Directors each year. Quarterly reports will cover current cases and risks, safeguarding and Prevent trends, missed-session patterns, mental health indicators, themes from low-level concerns, actions and training compliance. The annual report will provide a fuller year-end evaluation of trends, actions taken, the effectiveness and impact of interventions, policy and statutory updates, training compliance, lessons learned and priorities or areas for improvement. 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 operational monitoring, the three quarterly reports and the annual report 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 is promoted to all staff and that they receive appropriate training as follows:

Designation	Training required	Frequency
Directors	Annual safeguarding and Prevent refresher.	Annual
	Level 2 Safeguarding Children training, where role requires.	Every 3 years
	Safer recruitment (Director responsible for recruitment).	Every 2 years
	Prevent core-topic update	Every 2 years
Senior Managers	Annual safeguarding and Prevent refresher.	Annual
	Level 3 DSL training, where role requires.	Every 2 years
	Safer recruitment, where role requires.	Every 2 years
	Prevent core-topic update	Every 2 years
Safeguarding Lead	Level 3 DSL training.	Every 2 years
	Prevent role-specific training.	Every 2 years or when guidance changes
	Enhanced safeguarding and Prevent refresher.	Annual
	Prevent core-topic update.	Every 2 years
Deputy Safeguarding Lead	Level 3 DSL training.	Every 2 years
	Prevent role-specific training.	Every 2 years or when guidance changes
	Enhanced safeguarding and Prevent refresher.	Annual
	Prevent core-topic update.	Every 2 years

Delivery and admin staff	Level 2 Safeguarding Children and Prevent training.	Every 3 years
	Planned safeguarding CPD (internal or external).	At least twice in each 12-month period, inclusive of the annual refresher
	Safer recruitment, where supporting recruitment	Every 2 years
	Prevent core-topic update	Every 2 years
Learners	Safeguarding & Prevent.	During enrolment and then ongoing throughout programme
Employers	Safeguarding legal responsibilities and provider expectations.	At onboarding and when requirements change
	Health and safety/risk assessment.	At least annually, and more frequently according to risk

- All staff will receive safeguarding training at induction and regular safeguarding and child-protection updates, including online safety, as required by KCSIE. Formal safeguarding refresher training will be provided at least annually and more frequently where required by changes in guidance, emerging risks, role or identified need.
- As an organisational standard, every member of staff will take part in at least two planned safeguarding development activities during each 12-month period. These may include the annual formal refresher and a relevant workshop, conference, webinar, briefing, scenario-based exercise or external learning event. Activities must be relevant to the person's role, recorded in their CPD record and reflected in the central training matrix. This twice-yearly standard supports continuing competence; it is not described in this policy as a separate statutory training frequency.
- From 1 September 2026, every member of staff—including staff who do not work directly with children—must read Part One of KCSIE 2026 in full. Annex A is no longer a condensed alternative. The current document will be held in the Company Documents section of Breathe HR as the single source of truth. Staff must confirm that they have read and understood it and update their CPD record to reflect their learning. Managers will monitor completion and provide support to help staff understand and discharge their responsibilities.
- Training arrangements reflect the expectations of Keeping Children Safe in Education 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 through Breathe HR and the Staff Training Matrix, alongside standardisation meetings, team meetings, briefings and updates. Examples, scenarios and external training will be used to help staff understand and apply the policy in practice.

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).

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 2026) sets out definitions and examples of the four broad categories of abuse:

- Physical Abuse
- Emotional Abuse
- Sexual Abuse
- Neglect
- Child exploitation

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 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.

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.

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

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.

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

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 harassment and violence)

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 making or sharing of nudes and semi-nudes, including images that have been digitally altered or wholly generated using artificial intelligence (including deepfakes or deep nudes)

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.

Child-on-child abuse is a safeguarding issue for both the victim and the alleged perpetrator. It is preventable, and early recognition, proportionate recording and timely evidence-based support may prevent behaviour escalating into further abuse or violence. All reports—including incidents occurring in the workplace, outside the learning environment or online—will be taken seriously, recorded, risk assessed and investigated appropriately. The victim, alleged

perpetrator and any other affected learners will be supported according to their needs.

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

Serious violence is a continuing safeguarding concern and may involve physical assault, carrying, threatening with or using weapons, peer conflict, bullying, gang involvement or criminal exploitation. Indicators may include increased or unexplained absence, changes in friendships or relationships with older individuals or groups, a significant decline in educational performance, self-harm or a marked change in wellbeing, signs of assault or unexplained injuries, unexplained gifts or new possessions, offending history, or drug and alcohol use. Staff must immediately report concerns about a learner carrying or using a weapon, or expressing an intention to do so, to the DSL or deputy. The DSL will assess risk to the learner and others, consider contextual factors—including travel, workplace and online risks—and engage the police, local authority and other partners without delay where required.

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.

Children who are lesbian, gay, bisexual or gender-questioning

Ginger Nut Training recognises that children who are lesbian, gay, bisexual or gender-questioning may face additional barriers to disclosure and may be targeted by other children,

including online. Safeguarding and the best interests and welfare of the child will remain central to decision-making. Concerns will be reported to the DSL and support will be considered sensitively on a case-by-case basis, taking account of the child's wishes and feelings, privacy, safety, dignity, relevant equality duties and appropriate engagement with parents or carers, unless doing so would place the child at risk of harm.

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) 2026. 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. Mobile phones and smart devices must be used in a way that protects learner safety, privacy and positive behaviour. Staff must use approved organisational systems and devices for learner contact and must not use personal devices to photograph, record or store learner information unless expressly authorised under an approved procedure. Learners must follow Ginger Nut Training's online-session expectations and any lawful workplace rules on device use. Any device use linked to bullying, harassment, coercion, image-based abuse, grooming, exploitation or another safeguarding concern must be reported immediately.

13. Management of allegations against staff

Any concerns or allegations about staff will be recorded and dealt with appropriately in line with national (KCSIE) 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 (KCSIE) and local guidance. Ensuring concerns are dealt with effectively will protect those working 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 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 contact the LADO.

Duty to refer to the Disclosure and Barring Service (DBS)

Where an individual is removed from regulated activity, dismissed, redeployed away from regulated activity, or would have been removed had they not resigned or otherwise left, because they have harmed or posed a risk of harm to a child or vulnerable adult, Ginger Nut Training has a legal duty to make a referral to the DBS where the statutory referral criteria are met.

A referral must be made where Ginger Nut Training removes an individual from regulated activity (or would have removed them had they not left) and believes that the individual has engaged in relevant conduct in relation to children and/or adults, satisfied the harm test in relation to children and/or vulnerable adults, and/or been cautioned or convicted of a relevant automatic-barring offence. This duty applies to paid staff and volunteers engaged in regulated activity and applies even where another body has also been notified or made a referral.

The Director responsible for safeguarding, supported by the DSL and safer recruitment/HR leads as appropriate, will ensure that the investigation gathers sufficient information to assess the referral criteria. A person's resignation, retirement or cessation of volunteering will not prevent the investigation from being completed or the referral decision from being made. Any required referral will be submitted as soon as possible, with relevant supporting information retained securely. LADO/PiPOT or legal advice will be sought where the threshold is unclear.

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 within 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-level 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 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.
- Low-level concerns will also be reviewed collectively to identify patterns, emerging risks and any wider cultural issues within the organisation.
- 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.

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 Breathe 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 (2026), 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.

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.

Recordings

As Ginger Nut Training is an online provider, teaching, learning and review sessions will normally be recorded where this is technically and operationally possible, proportionate and consistent with the applicable privacy information. Learners do not have to switch their cameras on for recordings uploaded to external platforms or for group sessions.

Where a session cannot be recorded, or a camera is not used, the reason must be documented and reviewed through the appropriate employer-engagement or quality-assurance process. At the start of a recorded session, the tutor must make participants aware that recording is taking place and explain its purpose.

All recordings must be uploaded to OneFile within 24 hours in accordance with the approved process. Recordings will be accessed only by authorised individuals for stated purposes, stored securely, shared only where lawful and necessary, and retained and securely deleted in accordance with Ginger Nut Training's current learner and staff privacy notices, lawful basis for processing, data-protection policy and records-retention schedule. These supporting documents and the recording process will be reviewed together so that the stated purposes, access controls and retention periods remain aligned. Failure to follow the approved recording and data-handling process may be treated as a breach of this policy and addressed appropriately.

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 2026 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 monitoring and the annual safeguarding report 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	Date	Owner	Change
6.2	Aug ust 2026	Quality & Compliance lead	Updated to reflect KCSIE 2026 requirements, including mandatory reading of Part One for all staff and strengthened guidance on AI and online safety, child-on-child abuse, serious violence, mobile devices and gender-questioning children. Added the statutory DBS referral duty and updated staff training and CPD requirements. Revised governance reporting includes three quarterly monitoring reports and one comprehensive annual safeguarding report. Reconciled all reporting and training frequencies, including twice-yearly planned safeguarding development. Strengthened session-recording requirements reflect privacy notices, lawful processing, authorised access, secure storage and retention schedules.

Jacqui Celino

Jacqui Celino (Aug 27, 2026 14:32:17 GMT+1)

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Dan Williams (Aug 27, 2026 14:33:48 GMT+1)

Ginger Nut Training - Safeguarding and Prevent Policy - September 2026

Final Audit Report

2026-08-27

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