

Introduction

This policy has been developed to ensure that all staff at Northern Training Academy (NTA) are working together to safeguard and promote the welfare of children, young people, vulnerable adults our apprentices and other learners.

NTA aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard learner and staff welfare
- All staff are aware of and understand fully their statutory responsibilities with respect to safeguarding; staff are properly trained in recognising and reporting safeguarding issues.

NTA recognises that an apprentice has employed status and as such the policy also references the employers' responsibilities for Safeguarding.

Definitions

Ofsted adopts the definition used in The Education and Training (Welfare of Children) Act 2021 and the Department for Education (DfE July 2022) guidance document 'Keeping Children Safe in Education' **(1)**, which defines safeguarding and promoting children and young people's welfare as:

For Children (Under 18):

- *Protecting children from maltreatment*
- *Preventing the impairment of children's health or development*
- *Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care*
- *Taking action to enable all children to have the best outcomes*

Safeguarding children and child protection guidance and legislation applies to all children up to the age of 18.

Adults (18 and over):

- *Protecting the rights of adults to live in safety, free from abuse and neglect*
- *People and organisations working together to prevent and stop both the risks and experience of abuse or neglect*
- *People and organisations making sure that an adult's well-being is promoted, including where appropriate, taking fully into account their views, wishes, feelings and beliefs when deciding on any action*
- *Recognising that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances and also the potential risks to their safety or well-being*

Six Principles – Safeguarding Adults

Empowerment – At NTA we give individuals the right information about how to recognise abuse and what they can do to keep themselves safe. We give them clear and simple information about how to report abuse and crime and what support we can give. We consult them before we take any action. Where someone lacks capacity to make a decision, we always action on their best interest.

Protection – At NTA we have effective ways of assessing and managing risk. We have a complaints and reporting arrangements for abuse and suspected criminal offences. We take responsibility for putting them in touch with the right person.

Prevention - All NTA staff are trained in how to recognise signs and take action to prevent abuse occurring.

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Proportionality – NTA staff will discuss with the individual and where appropriate, with partner agencies what to do where there is a risk of significant harm before we take a decision.

Partnership - NTA are a national training organisation and therefore will work with agencies across all regions and the safeguarding team are aware how to make local contacts as appropriate.

Accountability The lines of accountability are clear. Staff understand what is expected of them and others. Agencies recognise their responsibilities to each other, act upon them and accept collective responsibility for safeguarding arrangements.

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm.

Neglect is a form of abuse and is the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development.

Safeguarding both adults and children is about preventing the risk of harm from abuse or exploitation or having the ability to reduce it by raising awareness and supporting people in making informed decisions.

Scope

This policy applies to all learners, apprentices and NTA staff associated with all aspects of training and apprenticeship delivery. It also extends to any consultants, associates and volunteers who work with NTA.

NTA aims to create and maintain a safe learning environment where all learners and adults feel safe, secure and valued and know they will be listened to and taken seriously. NTA are committed to the principles and recommendations outlined in ‘Working together to Safeguard Children – July 2022’ (2), ‘Keeping Children Safe in Education – 2022’ (3) and ‘Work based learners and the Prevent statutory Duty – guidance for providers’ (4) and implements policies, practices and procedures which promote safeguarding and the emotional and physical well-being of learners and staff.

NTA is committed to supporting the delivery of effective early help through multi-agency working.

Policy

1. NTA recognise that we all have a responsibility to ensure that learners, apprentices or adults at risk are protected from harm, informed about potential risks to their welfare, understand how to seek help and to ensure any concerns are dealt with in a timely and appropriate fashion, in line with best Safeguarding practises such as the concept of “early help”, providing support as soon as a problem emerges.
2. NTA give learners a set of “expectations” of their behaviour in course handbooks when they commence their learning.
3. NTA also have a responsibility to minimise the risk of allegations against Learning and Development Coaches and other staff.
4. All staff and Learning and Development Coaches are expected to comply with any Disclosure and Barring Service (DBS) check request. NTA undertakes checks to ensure that their staff are fit to work in a training provider setting with children and vulnerable adults. It also reserves the right to refuse to employ staff whom it has a reasonable belief may pose a risk to its learners.

NTA has systems in place to prevent unsuitable people from working with children or vulnerable adults and to promote safe practice. These systems apply to all new staff and require the following checks to be made prior to appointment:

- a minimum of two references where appropriate, satisfactory to NTA, one of which should be from a previous employer

- documentary evidence checks of identify, nationality, residency and “right to work” status
- enhanced DBS (Disclosure & barring service) check with barred list information (5)
- documentary evidence of qualifications
- satisfactory completion of the probationary period

In accordance with the Regulations, records of all checks carried out are kept in a single central record.

5. All staff and Learning and Development Coaches are expected to have a good understanding of what constitutes a Safeguarding or welfare concern and how to provide support or guidance and the channels for escalating a concern. This will also ensure that they can identify the Designated Safeguarding Lead (DSL) for NTA.
6. NTA will ensure that the contractual arrangements with Learning and Development Coaches clearly set out their Safeguarding obligations.
7. We will ensure that the contractual arrangements with the apprentices’ employer identifies who to contact so that we can understand how the employer meets their Safeguarding obligations for their apprentices.
8. We will provide initial and on-going training and information to proactively promote Safeguarding awareness and support all staff and Learning and Development Coaches to understand their individual responsibilities. Where no formal training is held by our Learning and Development Coaches, NTA will support them through distance learning as a mandatory part of induction. This will lead to the achievement of a minimum of a Level 1 regulated qualification in Safeguarding awareness. All Learning and Development Coaches will be required to submit evidence of their annual CPD in the area of Safeguarding and Prevent.
9. NTA will provide information on Safeguarding, welfare and well-being and the Prevent Duty during the learner and apprentices’ induction. It will also be included as a standing item as part of the visit and review process to ensure ongoing awareness.
10. Should a Learning and Development Coach or employee of NTA have a concern regarding the Safeguarding of an apprentice/learner they should report their concerns to the DSL. The DSL of NTA has an obligation to report any concerns to the Designated Safeguarding Officer at the apprentices’ employer. In the absence of the DSL at NTA, a suitable proxy will be assigned.
11. The same is true if any employee or Learning and Development Coach has a concern regarding a colleague or other professional.
12. Enquiries and Investigations; where outside agencies are involved in any Safeguarding incident or reported issue, we will, when required to do so, liaise and provide information to relevant authorities, whilst ensuring that the apprentice/learner is kept informed, where it is safe for them to be so.
13. Data collection, storage and sharing of records of Safeguarding incidents will be retained in a safe place, together with a written record of outcomes. All data shared between the apprentices’ employer, our Learning and Development Coach and NTA will be treated as confidential, unless there is a requirement to share with the appropriate local authorities, such as in a Safeguarding concern. No data shall be used in ways that might discriminate against any apprentice, Learning and Development Coach or NTA employee.
14. NTA values the fundamental rights of freedom of speech, expression of beliefs and ideology and tolerance of others which are the core values of our democratic society. However, all rights come with responsibilities and free speech or beliefs designed to manipulate the vulnerable or which advocate harm or hatred towards others will not be tolerated. NTA seeks to protect its apprentices/learners and staff from all messages and forms of violent extremism and ideologies including those linked to, but not restricted to, the following: Far Right/Neo Nazi, White Supremacist ideology, Islamist ideology, Irish Nationalist and Loyalist paramilitary groups and

extremist Animal Rights groups. NTA is clear that exploitation and radicalisation will be viewed as a safeguarding concern and will be referred to the appropriate safeguarding agencies.

15. NTA is aware that safeguarding cases can be distressing and that staff who have been involved may find it helpful to talk about their experiences, in confidence, with the DSL or with a trained counsellor. Staff wishing to be referred for counselling should discuss with their line manager.
16. The policy and any incidents arising appertaining to Safeguarding will be monitored on an ongoing basis by the Safeguarding Team
17. NTA will review our Safeguarding and Prevent duty policies and supporting processes annually. This will include an annual assessment of the potential risks and the context and level of Safeguarding risk posed by our work as a provider of apprenticeship training. This will feed into our risk assessment process so that we understand and can manage how we mitigate Safeguarding risks.

Safeguarding Process

This Safeguarding process has three aspects.

- Identify where risks around Safeguarding are most likely to occur in our business and apprentice/learner cohort
- Help by putting in place processes or strategies to appropriately support apprentices/learners/staff
- Manage Safeguarding risks in a way that is appropriate to our business and which act to minimise Safeguarding incidents or issues.

NTA Apprentice/Learner Safeguarding Reporting Procedure

The process outlined in Appendix C details the steps involved in raising and reporting Safeguarding concerns. Once reported to the Designated Safeguarding Lead, the process continues to the investigation stage and lastly, if necessary, to the referral stage. At any of these three stages, if we deem it appropriate and safe to do so, we may pass the information to the apprentices' or learners' employer. Prior to any apprentice starting with us we ask their employer to provide the contact details of their designated Safeguarding lead. This process must be followed at all times.

In the event that an employer, fellow employee, placement organiser, parent or guardian of a young person or vulnerable adult, or any other person coming into contact with a learner within the workplace context, tells a member of NTA staff about possible abuse the procedure as described above should be followed.

In the event a member of staff receiving an e-mail, text or telephone message from a learner, employee, fellow employee, parent or guardian or any other person coming into contact with a learner in the workplace context, should immediately notify the Designated Safeguarding Lead who will investigate the report and advise on further action needed.

Informing apprentices/learners about how to raise a Safeguarding concern

During apprentice induction, NTA will provide information about how to raise a Safeguarding concern. Induction includes information about our apprentice/learner behaviour strategy and discipline procedure, reasonable adjustments and fair access, equality and diversity and anti-bullying awareness.

NTA also provide key information about safeguarding and Prevent within the Apprentice/Learner Handbook. This is reinforced at regular visits and progress meetings, and topics are embedded into learning where appropriate opportunities arise. By covering these subjects at induction and ongoing, we aim to reduce the occurrence of Safeguarding issues.

NTA also communicate with all learners and apprentices on a regular basis through social media channels and newsletters. This is a further opportunity to highlight safeguarding issues.

Apprentice reporting Safeguarding concerns about another apprentice

Should an apprentice or learner report a Safeguarding concern regarding another apprentice or learner NTA will always take the issue seriously. The person receiving the information should still follow the above process.

Allegations against employees or associates

NTA recognises its duty to report concerns or allegations against its employees or associates (paid or unpaid) within the organisation or by a professional from another organisation.

Professional boundaries are what define the limits of a relationship between a Learning and Development Coach and an apprentice/learner.

All staff are aware of professional boundaries and understand the limit of the relationship between a learning and development coach and a learner.

Suspension of staff will not be automatic, but may be considered at any stage of an investigation. It is a neutral act, not a disciplinary sanction, and shall be on full pay. Consideration should be given to alternatives, for example, paid leave of absence, change of or withdrawal from specified duties.

Where a decision is made to suspend from duty, written confirmation of the suspension, with reasons will be given to the staff member.

NTA has a statutory duty to make reports and provide relevant information to the DBS where there are grounds for believing, following an investigation, that an individual is unsuitable to work with children or vulnerable adults, or may have committed misconduct. The responsibility for reporting cases to the DBS lies with the Designated Safeguarding Lead.

Resignation and compromise agreements

The fact that a person tenders their resignation or ceases to provide their services, will not prevent an allegation being followed up in accordance with this Policy. It is important that every effort is made to reach a conclusion in all cases of allegations bearing on the safety or welfare of children, young people or vulnerable adults including any in which the person concerned refuses to co-operate with the process.

Wherever possible the person should be given full opportunity to answer the allegation and make representations. However, if the person does not cooperate, the process should continue. It may be difficult, however, to reach a judgement on whether the decision can be regarded as substantiated based on all the information available. It may also not be possible to apply any disciplinary sanctions if a person's period of notice expires before the process is complete, but it is important to reach and record a conclusion wherever possible.

A compromise agreement will not take place in these circumstances.

Action in respect of false allegations

False allegations may be indicative of problems of abuse elsewhere. A record should be kept and consideration given to a referral to the Local Authority Designated Officer (LADO) in order that other agencies may act upon the information.

The Managing Director shall:

- Inform the member of staff against who the allegation was made orally and in writing that no further disciplinary or child protection action will be taken. Consideration should also be given to offering counselling and other supportive actions may be required.
- Inform parents/carers of the alleged victim (if under 18yrs old) that an allegation has been made, and the outcome.
- Where the allegation was made by a child, other than the alleged victim, consideration should be given to informing the parents/carers of that child.
- Prepare a report outlining the allegation, giving reasons for the conclusion that it had no foundation, and confirming that the above action had been taken.

In the event that the allegation is shown to have been deliberately invented or malicious, the Managing Director should consider whether any disciplinary action is appropriate against the person who made the accusation, if a staff member.

Record keeping and reporting

It is important that a clear and comprehensive summary of any allegations made is kept, along with details of how the allegation was investigated and resolved, with a note of actions taken and decisions reached. These should be kept on the staff member's personnel file and a copy provided to the person concerned.

The purpose of the record is to enable accurate information to be given in response to any future request for a reference, if the person has moved on. It will provide clarification in cases where a future Disclosure Barring Service (DBS) disclosure reveals information from the Police about an allegation that did not result in a criminal conviction. The record should be retained at least until the person has retired or for a period of 10 years from the date of the allegation, if that is longer.

If a member of staff is moved from the regulated activity, dismissed or resigns before the disciplinary process is completed, he or she should be informed about NTA's statutory duty to inform DBS.

Confidentiality

Information will be gathered, recorded and stored in accordance with the Data Protection Policy.

All employees must be aware that they have a professional duty to share information with other agencies in order to safeguard children and vulnerable adults.

Safeguarding children and vulnerable adults may override confidentiality interests. However, information will be shared on a need to know basis only, as judged by the Designated Safeguarding Lead.

Safeguarding Monitoring and Effectiveness

By considering the implications of effective Safeguarding in our business and training activities, we aspire to embed Safeguarding in all that we do as a provider of training.

To monitor and ensure the effectiveness of our Safeguarding policy we undertake:

- Annual review of this policy
- Annual review/update of the Prevent Duty Staff training with consideration of its links to this Safeguarding policy
- Annual communication of this policy to promote the importance of Safeguarding and ensuring all staff understand their responsibilities. New staff members will be issued with this policy during induction.
- Checking that related policies are up to date and relevant at least annually

- Monitoring of patterns or trends in order that we can learn from each incident or concern and mitigate the risk of similar Safeguarding issues being repeated.

Responsibility for this policy

NTA Managing Director is responsible for this policy.

Policy review

NTA will review the Safeguarding Policy and Procedure on an annual basis or in the event of the publication of new guidelines/official communications or following lessons learnt upon the conclusion of a Safeguarding incident, whichever is the sooner.

Designated Safeguarding Lead (DSL) – Pam Oddy
Contact for Safeguarding concerns/issues – safeguarding@northerntrainingacademy.com
Mobile - 07305 066 490
If the DSL is not available, please contact – Jo Roche – Managing Director
Mobile – 07936 698 269

APPENDIX A

THIS FORM IS CONFIDENTIAL - Safeguarding Concern Form

The contents of this form and the discussions leading to its completion **MUST** remain confidential and should not be discussed with any members of staff, learners or personal acquaintances other than those in the Safeguarding Team.

NTA Case Number:			
Date of reporting:			
Time of reporting:			
Immediate action required?			
Name of person at risk:			
Date of Birth:		Age:	
Programme of Learning:			
Employer/Location:			
Learning and Development Coach:			
Name of person completing this form:			
What are the safeguarding issues?			
Who disclosed (told you) this?	Was it: a) The learner/apprentice named above? b) Member of staff? Please provide the name: c) Another person? Please provide the name:		
Does the learner/apprentice know this is being reported?	YES	NO	
Has the apprentice/learner given consent to share information?	YES	NO	

<p>Are you aware of any background information regarding the learner/apprentice named?</p>	<p>For example:</p> <ul style="list-style-type: none"> • Learning support • Medical needs • Young carer • Housing issues • Family issues • Other
<p>Actions taken, by whom and when.</p> <p>Use Record of Action form if needed.</p> <p>Sign and date actions.</p>	

Outcome:

Signed:

NTA Case Number Allocated

THIS FORM IS CONFIDENTIAL - Safeguarding Concern Form

RECORD OF ACTIONS FORM

The contents of this form and the discussions leading to its completion MUST remain confidential and should not be discussed with any members of staff, learners or personal acquaintances other than those in the Safeguarding Team.

Name of NTA Staff Completing Form	
NTA Case Number	
Name of Person at risk	
Date Action Taken	
Details of action Taken	

Signed:

APPENDIX B

STEPS ON HOW TO RESPOND IF AN APPRENTICE/LEARNER DISCLOSES TO YOU

STEP 1
Give them time and attention
Allow the person to explain in their own words – questions should be kept to a minimum
Do not offer false confidentiality
Empathise with their situation

STEP 2
Reassure the person:
That it is ok they have told you
That they have done nothing wrong
Tell them what you are going to do next
BUT remember it is NOT your role to offer specific advice or to investigate alleged abuse

Do not assume facts
Do not give your opinion

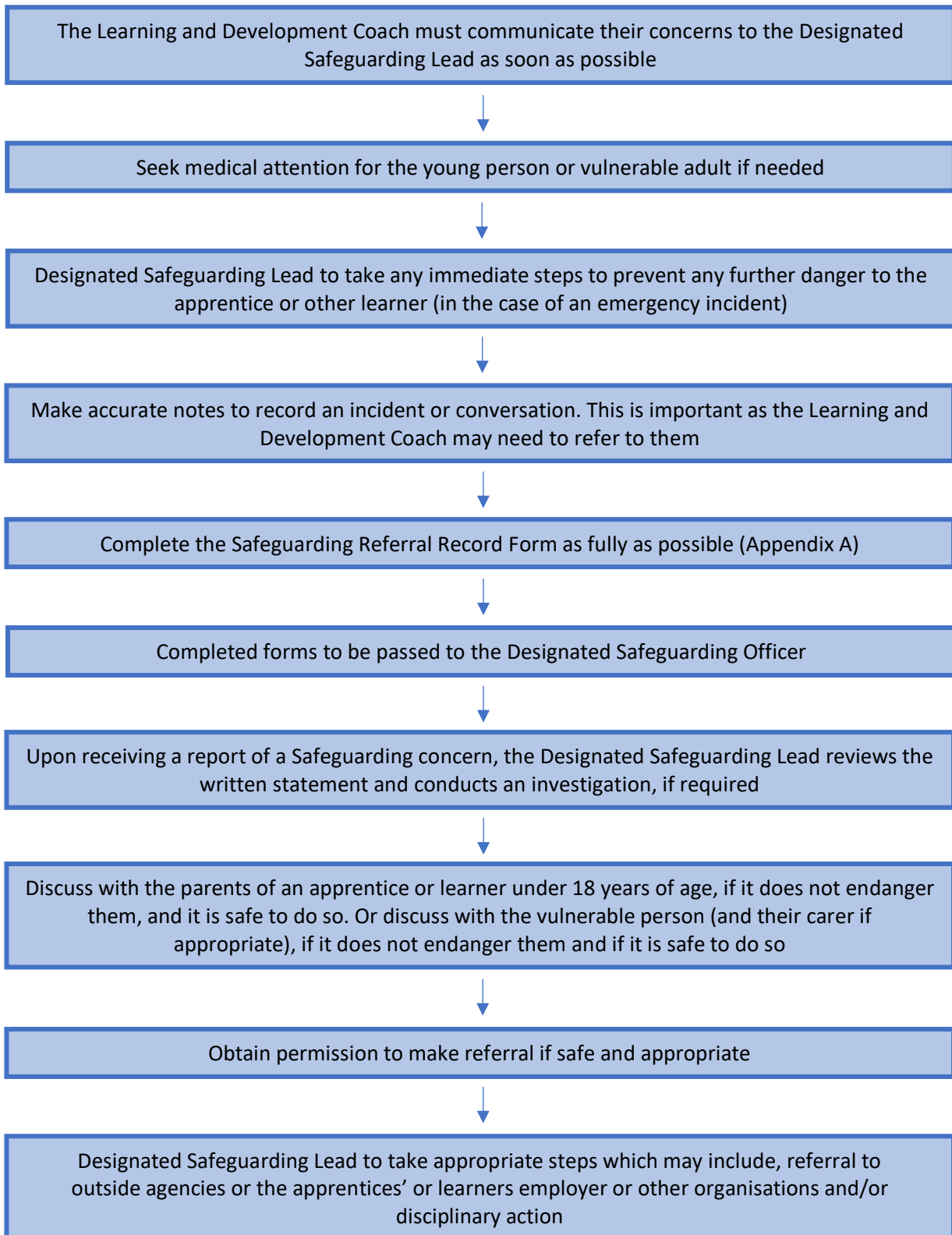
STEP 3
Complete the NTA Safeguarding and Protecting Form
Record what was said – be specific
The context in which it was said – who was present?

STEP 4
Inform Pam Oddy, Designated Safeguarding Lead immediately.
safeguarding@northerntrainingacademy.com

If the DSL is not available, please contact – Jo Roche (Managing Director)
Mobile – 07936 698 269

Do not discuss with any other person

APPENDIX C



REFERENCES/NOTES:

- (1) Page 1
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1101454/Keeping_children_safe_in_education_2022.pdf
- (2) Page 2
<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>
- (3) Page 2
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1101454/Keeping_children_safe_in_education_2022.pdf
- (4) Page 2
<https://www.gov.uk/government/publications/work-based-learners-and-the-prevent-statutory-duty>
- (5) Page 3
If a DBS check is delayed for any reason the staff member will not be subject to lone working with learners aged under 18. They must always have a member of staff present who is fully DBS checked until the point they receive a full DBS check.