

Training Now

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Safeguarding and Prevent Policy 2023-24

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If you are worried or concerned and need to speak to someone about safeguarding, please contact our Designated Safeguarding Lead (DSL), Deputy Safeguarding Lead (DDSL) or Safeguarding Officers (SO):

Training Now

DSL: Tara Roudiani, Managing Director: 07458 093436, tara.roudiani@training-now.co.uk

DDSL: Laura Lawson, Welfare and Support Manager: 07738 892289, laura.lawson@training-now.co.uk

Safeguarding Officer: Scott Jones, Operations Director: 07976 648974, scott.jones@training-now.co.uk

Safeguarding Officer: Jo Stone, Learning and Quality Manager: 07458 111870, joann.stone@training-now.co.uk

Safeguarding Officer: Jo Mackay, Delivery Manager: 07834 535318, Jo-AnneMackay@training-now.co.uk

Safeguarding Governor: Kaye Berry

Urgent Referrals: Phone 999 where there is immediate risk of injury or security or medical assistance is required

All apprenticeships are provided by Agincare Group Ltd's training division, Training Now.

1. Who is this policy for?

This policy is for all Training Now staff and all learners, whether they are on short courses, full cost courses or apprenticeships.

This policy sets out Training Now's responsibility to **you** as an Apprentice or Learner, regardless of where you work.

If you are working for any other Agincare company or another organisation, for example as a care worker, senior, team leader etc, you must follow their own 'Safeguarding Adults at Risk' and 'Safeguarding Children from Abuse' Policies that are related to how you manage safeguarding in your workplace for the people you care for.

2. What is safeguarding?

Safeguarding is about protecting the health, wellbeing and human rights of individuals. These measures allow children, young people and adults at risk to live free from abuse, harm and neglect.

3. What is Prevent?

The Prevent duty lays out our responsibility for preventing people from being drawn into extremism, radicalisation or terrorism.

4. What is this policy for?

This policy sets out Training Now's commitment to safeguarding and outlines what Training Now requires from staff, apprentices and learners to make sure that all our staff, apprentices, learners and visitors are safe. The policy aims to reassure and protect employees of Training Now who work in an environment where we promote the welfare of all apprentices and learners and will detail the skills required to identify potential abuse and how to record and report it.

We expect all our staff to act upon any allegation or concern regardless of how small or trivial it may seem. It is all our staffs' responsibility to safeguard all apprentices and learners.

Training Now's Safeguarding and Prevent Policy includes the Training Now's Prevent duty, the Prevent Risk Assessment and Action Plan.

Training Now is committed to raising staff awareness of all aspects of safeguarding, preventing abuse where possible and ensuring that robust procedures are in place for dealing with incidents of abuse. The organisation will not tolerate abuse in any form, and it is committed to promoting wellbeing, preventing harm and responding effectively if concerns are raised. We will demonstrate a culture of vigilance which minimises risks to apprentices and learners.

We have collective responsibility to:

- Protect our apprentices and learners from abuse, neglect and bullying
- Protect our apprentices and learners from extremism and radicalisation
- Protect our apprentices and learners from violence, and sexual and criminal exploitation

- Respect any confidentiality (if we are told any information that may lead us to believe that a child, young person or adult is at risk of significant harm, then we cannot promise total confidentiality)
- Identify, support and monitor our most vulnerable learners via our welfare calls
- Be alert to 3rd party information (even though we are not directly working with someone who is a child or an adult at risk, if we hear or see something, then these concerns must be reported.
- Report any abuse discovered or suspected.

Training Now carry out a criminal record check with the Disclosure and Barring Service (DBS) on all staff who have unsupervised access to children and adults at risk. These checks are carried out before a member of staff starts working with apprentices and/or learners or have access to children or adults at risk and if they are not, no staff will work with apprentices or learners unsupervised.

It is not our responsibility to decide if abuse has taken place. We are responsible for recording, reporting and referring any concerns or observations to the Designated Safeguarding Lead (DSL), Deputy Designated Lead (DDSL) or Safeguarding Officer (SO) and we need to do this in a timely manner. We need to work together to safeguard apprentices and learners, in line with this Policy, and set down by the Local Safeguarding Children Board (LSCB), Safeguarding Adults Board ([SAB](#)) and Channel scheme as appropriate.

5. Links to other policies

This policy is written in the context of Agincare Group's Safeguarding Policies and Procedures. It should be read in conjunction with the Acceptable Use of IT Policy and the Equality and Diversity Policy. Staff should also refer carefully to the Staff Handbook for Training Now for more information and adhere to all Agincare's People Policies.

This policy is also linked to national legislation:

- The [Care Act 2014](#) updated 13 October 2021
- The [Care and Support Statutory Guidance](#) – updated August 2021
- [Keeping children safe in education: Statutory guidance for schools and colleges. DfE September 2021](#)
- [Prevent Duty guidance: for further education institutions in England and Wales](#) – updated April 2021
- [The Protection of Freedoms Act 2012](#) – updated 13 October 2021
- [Safeguarding Vulnerable Groups Act 2006](#) – updated 12 October 2021
- [The Children's Act 2004](#) – updated 13 October 2021
- [No Secrets: guidance on protecting vulnerable adults in care](#) - Department of Health - updated January 2015
- [Data Protection Act 2018](#)

6. Protection of apprentices and learners

Training Now holds, as one of its highest priorities, the health, safety, welfare and wellbeing of all apprentices and learners involved in courses or activities which come under the responsibility of Training Now.

Training Now has a statutory and moral duty to commit to practices that protect and prevent apprentices and learners from being abused or becoming radicalised. Employees recognise and accept their responsibility to develop the awareness of the risks and issues involved in safeguarding. Training

Now recognises that it has a responsibility to protect staff from unfounded allegations of abuse. We are committed to working with existing Local Children Safeguarding or Adult Safeguarding Boards, Channel and other partnerships to ensure the safeguarding of our apprentices, learners and staff.

Training Now is committed to ensuring:

- A safe environment for all apprentices and learners in which to learn
- Apprentices and/or learners who are suffering, or are at risk of suffering significant abuse/radicalisation are identified swiftly
- Training Now will take appropriate action to see that apprentices and learners are kept safe.

To achieve these aims, Training Now will review this policy and procedure annually, or when needed as legislation or guidance changes, with the aim of:

- Raising awareness of issues relating to the welfare and wellbeing of apprentices and learners and to make sure there is a safe environment to learn in
- Making sure we can identify apprentices or learners who are at risk of abuse/radicalisation/mental ill health, and have sensible and straightforward procedures for reporting our concerns
- Having procedures for reporting and dealing with allegations of abuse/radicalisation against members of staff
- Safely recruiting staff and keeping their safeguarding knowledge up to date.

There is a useful rule for anyone who has a safeguarding responsibility.

It is called the **3 Rs**:

- **RECOGNISE**: understand the risk indicators or signs of abuse or neglect
- **RECORD**: make a note of what was said in as much detail as you can, using the learner's own words where possible, to pass on to a designated safeguarding officer
- **REPORT**: escalate your concern to the safeguarding team, following your organisation's procedures.

Who is responsible for safety and protection?

Training Now have produced these guidelines to make sure that the rights of children and at-risk or vulnerable individuals are protected. All our staff participate in training relevant to their role to raise awareness of the issues to follow statutory guidelines in the reporting of concerns.

All staff who have contact with apprentices and learners have a responsibility to be aware of issues of abuse, neglect or exploitation. Staff should pay special attention to any at-risk learner's learning needs and try to consider any special requirements that they may have.

If any member of staff believes that abuse is or may be taking place, they must act on this information immediately. **Doing nothing is not an option** as the first priority is always to make sure all children and adults are safe and protected.

The Senior Management Team are responsible for making sure all staff understand and follow the Safeguarding and Prevent Policy and procedures and know how to act if they are worried or concerned about an apprentice or learners.

Training Now has a Designated Safeguarding Lead (DSL) who promotes safeguarding awareness and practice within the organisation. Their contact details are easily available to all staff, apprentices and learners.

What to do if you suspect abuse, neglect or exploitation

All staff must act promptly if they have any concern or suspicion about an apprentice or learner who is at risk of being abused (including self-harm), neglected or exploited.

What you should know (Staff)

Apprentices and/or learners can potentially be abused by anyone. This includes; family members, the community, themselves, employees (including those employed to promote their welfare and protection from abuse), visitors, volunteers and fellow learners.

Training Now's Designated Safeguarding Lead is responsible for safeguarding. You must make sure you have their contact details easily available, i.e. saved into your work phone.

You must not try to investigate any potential abuse on your own. Staff are not equipped or qualified to do so. If you suspect anything, you should immediately inform your Designated Lead in person or by telephone. Even if you have only heard rumours of abuse, or you have a suspicion but do not have firm evidence, you should still contact them to discuss your concerns.

All staff must know what services are available and how to access help and advice for the apprentice or learner at risk. You must also know how and where to make a direct referral, if speaking to a manager or Designated Lead would cause a delay and put a person at risk.

All staff must be aware of the mandatory duty to report to police any case where an act of female genital mutilation appears to have been carried out or about to be carried out on a girl under the age of 18.

Recognising the behaviours, signs or symptoms of abuse

It is really important that we are all aware of the behaviours, signs or symptoms that tell us that abuse may have or is happening as well as knowing that abuse can happen at work or in any other setting that an apprentice may find themselves in. Our staff can find more information about the behaviours, signs and symptoms in the Staff Handbook.

If you suspect that abuse or radicalisation is taking place, you must report your concerns to the Safeguarding Lead. This should be a phone call to start with, but must be followed up with **Welfare and/or Wellbeing Concern** form (Appendix 2).

The Safeguarding Lead (or officer) will make an appropriate referral to the Police, Social Services, the Local Children's safeguarding authority (or equivalent), Local adults safeguarding authority (or equivalent) and Young People's Services, local Prevent officer or other agencies such as Channel if needed.

What you should do (Record and Report)

If an apprentice or learner raises a concern for their own welfare and wellbeing you must:

- listen and record all information given to you not ask leading questions
- not make judgements or assumptions regarding the information

- take any action required to secure the immediate safety of the learner
- make no promise that the information will not be shared with the appropriate agencies
- give the learner reassurance that they have done the right thing
- contact the Designated Safeguarding Lead, Deputy or Safeguarding Officer to inform them of the situation
- The Designated Safeguarding Lead will decide the next course of action that is appropriate.

If this is a safeguarding incident or a disclosure, you should make a record of it on the **Record of Disclosure and Discussion** form (Appendix 1) which will be completed and given to the DSL within 24 hours of the first discussion.

If an apprentice or a learner is **in immediate danger or needs medical assistance**:

- Call the police and/or an ambulance (999) if anyone urgently needs medical treatment or protection
- Make a report to the police about any possible crime. You should also try to preserve any evidence, for example if there has been a physical or sexual assault, especially if the suspect is still at the scene
- Tell your Designated Lead or line manager about the issue. If the Designated Lead or line manager is implicated in the abuse, then inform a more senior manager.

If you have a concern for the welfare and wellbeing of a learner you must:

- Report your concerns immediately to the Designated Safeguarding Lead /DDSL/SO who will decide the next course of action that is appropriate.

If this is a concern or observation rather than a safeguarding incident or disclosure you should report to the DSL or DDSL via a phone call and then complete the **Welfare and/or Wellbeing Concern** form (Appendix 2) and send to the DSL/DDSL/SO.

If a parent or guardian contacts you to report a concern about their child you must:

- Listen and record all information given to you
- Not make judgements or assumptions regarding the information
- Liaise as appropriate with the parent or guardian
- Contact the Designated Safeguarding Lead to inform them of the situation
- The Designated Safeguarding Lead will decide the next course of action that is appropriate.

If an apprentice reports on unsafe practices or safeguarding issues at their work environment you must:

- Advise the learner to follow their in-house reporting or whistleblowing procedure
- Support the learner in speaking to the appropriate senior team members
- Contact the Designated Safeguarding Lead or Officer to inform them of the situation.
- The Designated Safeguarding Lead will monitor the issue to outcome.

What to include in the report

- Make sure your report is purely factual. Don't include opinions or personal interpretations of the facts presented.

- Include as much detail as possible. This could include any apparent physical signs of abuse or other circumstances which led to your suspicions. It could also include an accurate record of what the person involved told you about the abuse.
- Remember to sign and date the report. Store a copy in a secure place.
- If you are unsure about what to write, you can get advice from your Designated Lead. For further guidance on how to write your report, see the **Record of Disclosure and Discussion at Appendix 1**.

How to talk to a potential victim of abuse

If a child or an adult comes to you with a report of abuse, you should listen carefully to them, using the following guidelines:

- Tell them that you are required to pass on any information they give you and that you will not be able to keep information confidential if it is a safeguarding concern, if they are in danger, if it relates to a serious crime or if their case needs to be referred to an external agency.
- Reassure them that they are right to speak up about their concerns.
- Allow them to speak without interruption.
- Never trivialise or exaggerate the issue. Let them know that you are taking the matter very seriously.
- Never make suggestions, coach or lead the individual in any way.
- Always ask enough questions to make sure you understand, but do not probe, interrogate or make them repeat themselves over and over.
- Remain calm – remember this is not an easy thing for them to do.
- Do not show your emotions. If you show anger, disgust or disbelief, they may stop talking to avoid upsetting you. They may also feel your negative feelings are directed towards them.
- Make the individual feel secure and safe without causing them any further anxiety.

What to do about confidentiality

Disclosure

Any disclosures made by apprentices or learners must be treated seriously, sensitively and although confidentiality should be respected, you will need to make it clear that you will need to report any disclosures to a trained Safeguarding Officer.

All conversations about any incidents or concerns must be held in private and you should maintain confidentiality and trust as much as possible, keeping in mind that the safety of our learners, staff and apprentices must come first.

The person disclosing must be made aware that the information they are giving will be passed on to a trained Safeguarding Officer, who in turn may refer to an outside organisation to get the person the right help and support they need. Although at Training Now we comply with the Data Protection Act 2018, we are allowed to give personal data without consent if we believe it is to protect an at-risk person.

The Designated Lead will only speak to other staff on a 'need to know' basis and otherwise the information will be kept confidential. There will be a written record of the information that has been shared and these will be stored securely.

We will not disclose this information to a parent, relative, carer or any information on a child or at-risk adult if this would put them at risk of harm.

What happens next

The Designated Lead will consider all the information available and decide on the next steps, which may include taking no further action. Where it is decided that further action is necessary, this may be to:

- Seek further advice from Family Support and Child Protection Team as appropriate
- Make a referral to Social Services, another referral agency or the local Safeguarding teams
- Report the incident to a designated Social Worker (if the adult has one)
- Report the matter to the police if a crime is suspected.

If a referral is made, this must be confirmed in writing by the Designated Lead to the appropriate agency within 24 hours.

The Designated Lead will inform the member(s) of staff who raised the concern about the processes and procedure that has been followed within 5 working days. However, this will only be on a 'need to know' basis.

If we are referring a safeguarding incident to Social or Care Services, we would usually inform the person that we are doing that. However, if it is due to the following, we will not:

- If sexual abuse is suspected within the family
- If there is evidence of fabricated or induced illness
- If to do so would place the child/person in more danger
- If to do so would place the staff member in danger.

If anyone requires additional support as a result of a safeguarding incident or concern, they can contact the Welfare and Support Manager for support.

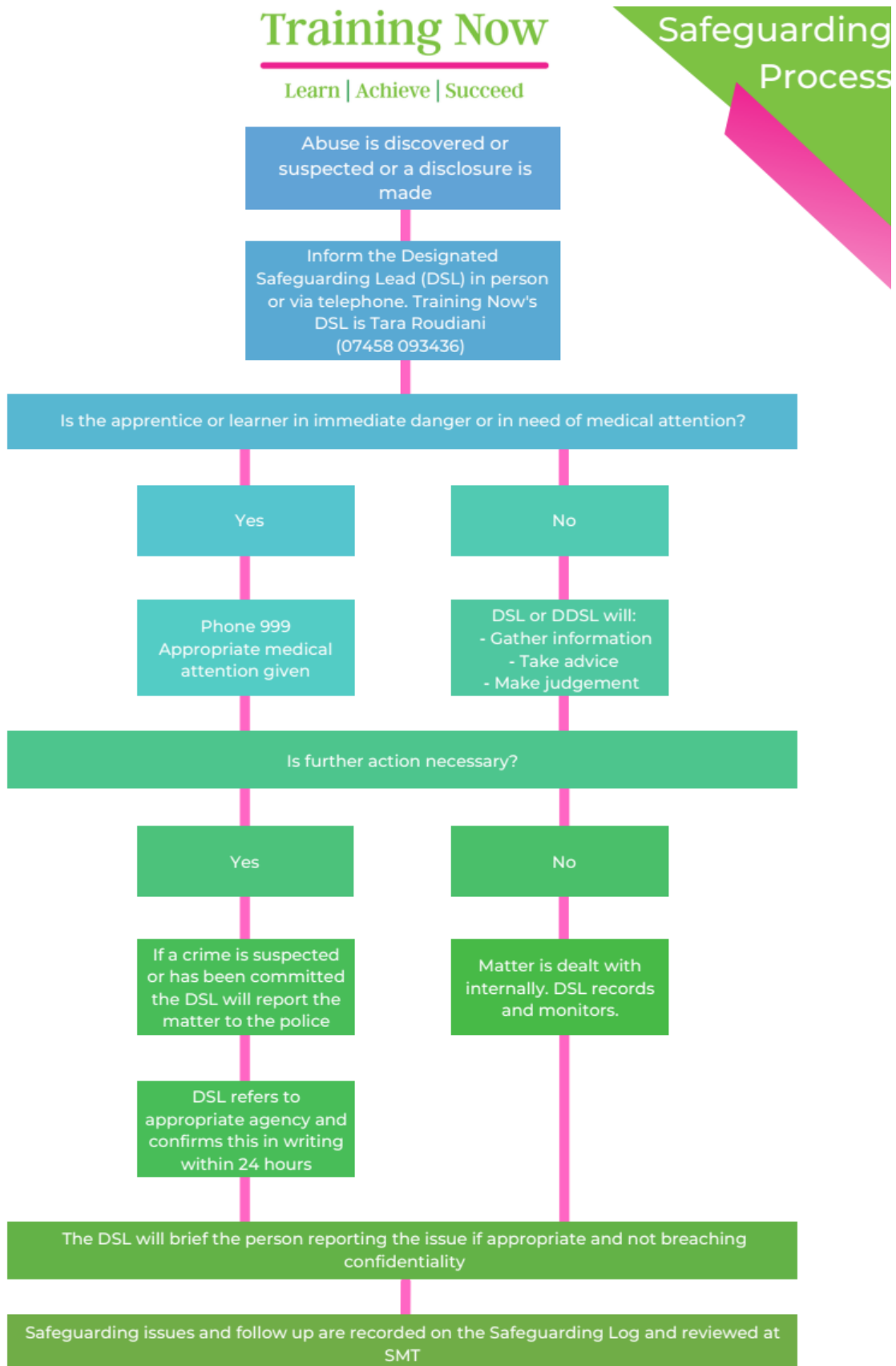
Investigations

If an investigation needs to happen as a result of a complaint, allegation or a suspicion of abuse, then only a suitably trained Designated Safeguarding Lead will do this.

Sometimes an investigation may need to include talking to other apprentices, learners or staff. The only person who should do this is the trained Designated Safeguarding Lead or this could lead to problems if the case goes to court.

The Designated Safeguarding Lead will decide what referrals they need to make to outside agencies. They will also take advice from other Safeguarding Leads, the Managing/Operations Director or our Safeguarding Governor. We also do a quarterly report to the board which updates them on safeguarding, wellbeing, welfare and Prevent. All our reports are kept confidential and are subject to the Data Protection Act.

7. Training Now's Safeguarding Process



8. What are the different types of abuse?

We have a duty to be vigilant and look for signs of abuse to protect our learners. These are the different types of abuse that we have been trained to look out for:

- Bullying
- Child Criminal Exploitation (CCE)
- Child Sexual Exploitation (CSE)
- Coercive Control
- Crime and fear of crime
- Criminal Exploitation (County Lines): Useful videos to support your understanding of County Lines can be found at: <https://www.youtube.com/watch?v=3ILaguFXHr4&t=103s> and <https://www.educare.co.uk/news/what-is-county-lines>
- Cuckooing
- Cyber bullying
- Discriminatory abuse
- Domestic abuse
- Female Genital Mutilation (FGM), including breast ironing: All staff must be aware of the mandatory duty to report to police any case where an act of FGM appears to have been carried out or about to be carried out on a girl under the age of 18.
- Factitious disorder imposed on another
- Financial abuse
- Forced marriage
- Gaslighting
- Homelessness highlighted as vulnerability
- Honour-based abuse
- Inappropriate supervision by staff i.e. bad practice
- Institutional or organisational abuse
- Modern slavery (see also Training Now's Modern slavery statement).
- Neglect
- Peer on peer abuse
- Physical abuse
- Psychological/Emotional abuse
- Radicalisation and extremism
- Self-harm
- Sexual abuse (including peer-on-peer and via digital devices)
- Sexual exploitation
- Sexual harassment
- Victimisation due to race, sexuality, faith, age, gender, disability

Criminal Exploitation (County Lines)

Criminal exploitation is also known as 'county lines' and is when gangs and organised crime networks groom and exploit vulnerable people (including children and young people) to sell drugs. Often these people are made to travel across counties, and they use dedicated mobile phone 'lines' to supply drugs.

We have a duty to be vigilant and look for the signs of criminal exploitation in order to protect our learners.

Useful videos to support your understanding of County Lines can be found at:

<https://www.youtube.com/watch?v=3ILaguFXHr4&t=103s>

Other potential safeguarding concerns

We have a duty to be vigilant and look for signs of abuse to protect our learners:

- **Child Criminal Exploitation (CCE).** CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.
- **Child Sexual Exploitation (CSE).** CSE¹ is a form of child sexual abuse. It is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been sexually exploited even if the activity appears consensual (no child under 18 can consent to being abused sexually or otherwise). CSE does not always involve physical contact; it can also occur through the use of technology. It may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).
- **Domestic abuse.** The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological; physical; sexual; financial; and emotional.
- **Honour-based abuse.** So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

9. Preventing extremism and radicalisation (Prevent)

At Training Now, we will provide a secure environment for our apprentices and learners, where they feel safe, are kept safe and where equality and inclusion are actively promoted.

Extremism and exposure to extremist materials and influences can lead to poor outcomes for apprentices and learners and so should be addressed as a safeguarding concern.

With the increased use of the internet and social media, we must recognise that radicalisation can occur here as well as in other settings, for example at home or work. Extremists will exploit and use any means necessary, including the internet and social media, to spread disinformation,

¹ [Child sexual exploitation: definition and guide for practitioners - GOV.UK \(www.gov.uk\)](#)

misinformation, and conspiracy theories leading to a rise in false and misleading narratives. They will often use topical, newsworthy events, for example the pandemic/Covid-19. This has led to a marked increase in extremist hate narratives and a lack of places where such views can be challenged. If we fail to challenge extremist views, we are failing to protect our apprentices and learners and to promote equality and diversity.

There is no place for extremist views of any kind at Training Now, whether internally (from apprentices, learners, staff or governors) or externally (from the community, employers, other agencies or individuals).

Our learning environment, including online, must be a safe place where apprentices and learners can explore controversial issues, such as global conflicts and hate crimes, safely and where our learner facing staff encourage, contextualise and facilitate this. Our staff receive opportunities to enhance and practice their skills in managing people with unpalatable views or having 'difficult' conversations during their training sessions.

We have a duty to protect this freedom alongside protecting our learners and staff from extremism. We carefully balance our legal duties in terms of both ensuring freedom of speech and also protecting apprentice, learner and staff welfare.

We want to:

- Promote our shared values, including Values in Britain
- To support our apprentices and learners to have a full and active role in their communities and wider engagement in society
- Keep our learners safe from bullying, harassment and discrimination
- Support apprentices or learners who may be at risk of radicalisation, get them support and advice and guidance
- Know all our apprentices, learners and staff are aware of their roles and responsibilities in preventing violent and non-violent extremism.

What is extremism?

Training Now uses the following definition of **extremism**:

'Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs; and/or calls for the death of any person, whether in this country or overseas'.

Extremists of all persuasions aim to develop destructive relationships between different communities by promoting division, fear and mistrust of others based on ignorance or prejudice. Education is a powerful weapon against this by giving people the knowledge, skills and critical thinking to challenge and debate in an informed way. Training Now wants to ensure that all learners thrive, feel valued and not marginalised.

What is radicalisation?

Radicalisation is a process by which an individual or group starts to agree with increasingly extreme political, social, or religious ideals and aspirations that (1) reject or undermine the status quo or (2) reject and/or undermine contemporary ideas and expressions of freedom of choice. To keep apprentices and learners safe from radicalisation or extremism, Training Now works to the Prevent element of the Government's Counter Terrorism Strategy, and if appropriate will seek external support

for our apprentices or learners through referrals to the Channel Programme. This programme aims to work with the individual to address their specific vulnerabilities, prevent them becoming further radicalised and possibly entering the criminal justice system because of their actions. We understand that radicalisation can occur to an individual from any section of society and is not particular to any racial, ethnic or social group. In many instances the process of radicalisation is essentially one of grooming by others.

What is Ideology?

An **ideology** is a set of beliefs

What is Terrorism?

Terrorism is an action that endangers or causes serious violence, damage or disruption and is intended to influence the government or to intimidate the public and is made with the intention of advancing a political, religious or ideological agenda

What is Vulnerability? **Vulnerability** describes factors and characteristics associated with being susceptible to radicalisation.

Reporting Concerns under Prevent

If you have any concerns about extremism or radicalisation, these should be reported to the DSL. Use the Channel Referral Process Flowchart in **Appendix 4**. Channel is a multiagency referral process for at-risk individuals and is part of the Prevent Strategy. Examples regarding extremism are very rare but would apply when there is information that a violent act is imminent, or where weapons or other materials may be in the possession of an individual or within the community. **In this situation, call 999.**

Staff responsibilities (Prevent)

From time to time, providers, the local authority or the police may report safeguarding issues affecting learners in other settings. Staff should take note of these and also look out for:

- Learners talking about their exposure to the extremist actions, views or materials of others. This might include from other learners, relatives or local community groups, especially where learners have not actively sought these out.
- Graffiti symbols, writing or artwork promoting extremist messages or images.
- Learners accessing extremist material online, including through social networking sites.
- Learners voicing opinions drawn from extremist ideologies and narratives.
- Use of extremist or 'hate' terms to exclude others or incite violence.
- Intolerance of difference. This could include secular or religious intolerance or offensive views based on gender, disability, homophobia, race, colour or culture.
- Attempts to impose extremist views or practices on others.
- Extreme anti-western or anti-British views.

Further information can be found at:

www.gov.uk/government/publications/prevent-duty-guidance

www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty

www.preventforfeandtraining.org.uk

Understanding and Recognising Risks and Vulnerabilities of Radicalisation

Individuals can be drawn into violence or they can be exposed to the messages of extremist groups by many means. These can include through the influence of family members or friends and/or direct contact with extremist groups and organisations or, increasingly, through the internet (which has happened more as a result of the pandemic). This can put an individual at risk of being drawn into criminal activity and has the potential to cause significant harm. Vulnerable individuals and/or groups may be susceptible to exposure or involvement with groups or individuals who advocate violence as a means to a political or ideological end. Examples of extremist causes that have used violence to achieve their ends include far right groups, County lines (radicalising young people to deliver drugs) INCEL internal terrorist organisations and international terrorist organisations.

Most individuals, even those who hold radical views, do not become involved in extremism. There are factors which can contribute to and influence the range of behaviours that are defined as extremism.

Safeguarding adults at risk from radicalisation is no different from safeguarding them from other forms of harm. Indicators may include (but are not limited to):

- Family tensions
- Sense of isolation
- Migration
- Distance from cultural heritage
- Experience of racism or discrimination
- Feeling of failure etc.

Those in the process of being radicalised may become involved with a new group of friends, search for answers to questions about identity, faith and belonging, possess extremist literature or advocate violence actions, change their behaviour and language or seek to recruit others to an extremist ideology.

It is important to note individuals experiencing these situations or displaying these behaviours are not necessarily showing signs of being radicalised. There could be many other reasons for the behaviour which may include substance misuse, family breakdown, domestic abuse, bullying or even something more minor.

It is important to be cautious in assessing these factors to avoid inappropriately labelling or stigmatising individuals because they possess a characteristic or fit a specific profile. It is vital that all professionals who have contact with vulnerable individuals are able to recognise those vulnerabilities and help to increase safe choices.

Vulnerability and Risk Indicators

There is no such thing as a 'typical extremist' and those involved in extremism come from a range of backgrounds and experiences. The following indicators have been provided to support you to understand and identify factors that may suggest vulnerability to or involvement with extremism. These are not exhaustive and we need to be careful not to over-simplify what draws people into to extremism or make any assumptions based on demographics or poverty indicators. See Appendix 6 for more information.

10. Roles and Responsibilities

The **Managing Director** has overall and final responsibility for Safeguarding and Prevent in the organisation and will deal with issues or concerns and also acts as the Designated Safeguarding Lead.

The **Designated Safeguarding Lead** (DSL) is responsible for overseeing day-to-day safeguarding issues, ensuring that the policies and procedures are implemented effectively, staff training, the safeguarding log and liaising with **Human Resources** to ensure the Single Central Register is kept up to date and accurate. The DSL will also update staff on local safeguarding issues, prepare a Safeguarding and Prevent Report for the Board and have overall duty for making sure the Prevent Duty is effectively embedded into practice.

The DSL is supported by a **Deputy Designated Safeguarding Lead** (DDSL) and fully trained **Safeguarding Officers** (SO).

Training Now also have a **Board** who are responsible for ensuring there is a culture of vigilance and safeguarding. Our **named Board Member** is responsible for making sure we are compliant with our safeguarding policies, procedures and the law, our training is robust and up-to-date and we are keeping effective records.

All Training Now staff are responsible for safeguarding and must be vigilant to signs of abuse or neglect. **Learner facing staff** will use their contact with apprentices and learners to positively deliver and inform learners about our responsibility in safeguarding them, our Prevent duty as well as promoting: healthy relationships, personal safety, e-safety and healthy living. The **DDSL** will further support the welfare of apprentices and learners by carrying out random welfare checks using the welfare check spreadsheet. This spreadsheet will be password protected for reasons of confidentiality and concerns raised as part of this process will be dealt with accordingly.

Safeguarding is embedded as part of our **employer engagement** processes raising awareness of the importance of Safeguarding with employers via quarterly safeguarding and wellbeing employer hub.

The Teaching and Learning Coach (TALC) will routinely check the safeguarding, welfare and wellbeing of apprentices during their monthly reviews or more frequently if necessary. If a TALC is concerned about an apprentice's wellbeing or welfare, they can refer to the Welfare and Support Manager via the **Welfare and/or Wellbeing Concern form** (Appendix 2).

11. Safer staff recruitment

Training Now follows Agincare Group's Recruitment and Selection Policy and Disclosure and Barring Policy to minimise the risk of recruiting unsuitable staff. These policies comply with the 'Keeping Children Safe in Education'² (2023) which sets out the responsibilities of all local authorities, schools and Further Education (FE) colleges in England to Safeguard and promote the welfare of children and young people.

We will comply with requirements of the Safeguarding Vulnerable Groups Act 2006 (amended September 2012) in regard to the definition of Regulated Activity and also those issued by the Disclosure and Barring Service (DBS) and Agincare DBS checks.

12. Staff Code of Behaviour

Although it is not possible to provide instructions on behaviours that apply to all situations when staff come into contact with apprentices and learners, there are some general principles and standards that can help to make sure both staff and individuals stay safe.

² https://assets.publishing.service.gov.uk/media/64f0a68ea78c5f000dc6f3b2/Keeping_children_safe_in_education_2023.pdf

This code should help protect both individuals and members of staff. Any member of staff who does not comply with this Code of Behaviour may be subject to a disciplinary procedure.

Staff must:

- Implement this Safeguarding Policy and Procedure at all times
- Understand the need to prevent people from being drawn into terrorism. This includes not just violent extremism but also non-violent extremism, which can "create an atmosphere conducive to terrorism and can popularise views which terrorists exploit."³
- Understand the need to prevent people from being drawn into Child Criminal or Sexual Exploitation. This includes activity to coerce, control, manipulate or deceive a child into any criminal or sexual activity, including County Lines.
- Understand their legal responsibility to promote British values of "democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs" in their practice⁴.
- Understand how to help apprentices and learners stay safe online and use digital technologies responsibly.

Staff must never:

- Engage in rough, physical games including horseplay with any apprentices or learners
- Allow or engage in inappropriate touching of any kind
- Make sexually suggestive comments to any apprentice or learner
- Engage in a personal relationship with an adult learner, or an adult who becomes a learner
- Do things of a personal nature for adults or children that they can do for themselves
- Physically restrain an adult or child unless the restraint is to prevent physical injury of the individual or other people. Physical restraint must always be appropriate and reasonable as otherwise it can be defined as assault
- Spend time alone with an individual outside of the normal learning situation or environment. If a member of staff finds themselves alone with an at-risk individual, they must make sure that they can be clearly observed by others
- Share personal mobile, email or social media sites with learners
- Have adults or children in a vehicle unless there is another member of staff or a volunteer with them. If there is an extreme emergency (e.g. for medical purposes) where a member of staff is alone with a learner, a manager, the key worker, or parent/carer must be notified immediately. It is also essential that there is adequate insurance for the vehicle to cover transporting these individuals.

Allegations against staff

The primary concern of Training Now is to ensure the safety of the individual. As with any other suspected abuse, any reports of physical or sexual abuse made against a member of staff should result in prompt action and taken seriously. Each allegation will be investigated in line with Agincare's Safeguarding and Whistleblowing Policy and Procedure. This policy sets out the responsibility to report and consult with the Local Authority and follow their local guidelines (these may be different depending on the authority). If it is an allegation referring to an adult, then the Local Authority's Safeguarding Adults Board should be notified, and if the allegation is about someone who is under 18, i.e. a child, then the Local Authority Designated Officer (LADO) will be notified.

³ Prevent Duty Guidance: for Further Education institutions in England and Wales 2015 - Section 1

⁴ Prevent Duty Guidance: for Further Education institutions in England and Wales 2015 – Section 20,21

Agincare's Staff Handbook includes the code of conduct for all staff employed by Agincare Group (this includes all Training Now staff).

All staff must maintain appropriate boundaries in their dealings with apprentices and learners. Intimate or sexual relationships between staff and apprentices or learners will be regarded as a breach of professional conduct.

Anyone who suspects a member of staff of abusing an apprentice or learner must immediately bring their concerns to the Designated Safeguarding Lead. If the allegation concerns any member of the Senior Management Team, the matter should be discussed with the Managing Director. If the allegation concerns the Managing Director, the matter should be discussed with the Chief Operating Officer of Agincare Group who will follow the procedure for safeguarding children or adults.

13. Staff Training

In line with Keeping Children Safe in Education 2023 Statutory guidance for schools and college, Training Now expects all their staff to comply with safeguarding and prevent policy and procedures.

The Designated Safeguarding Lead is trained to Level 3/4 standards, and the training must be refreshed every 2 years. In addition, the Designated Safeguarding Lead will undertake annual Continual Professional Development (CPD) which is recorded on the central staff training record. Deputy Designated Safeguarding Leads and Safeguarding Officers receive training at the equivalent to Level 3, but ideally the same as the Designated Lead. This is refreshed every 2 years. Our board members are trained to understand their responsibilities regarding Safeguarding and Prevent (see **Appendix 3**).

All new staff are required to have a safeguarding induction as soon as they start in their role (ideally on their first day, but definitely within the first week of starting their role). This is followed by mandatory safeguarding training within the first six weeks of employment. For staff who deal with apprentices and learners, this should meet the Level 2 safeguarding training standards. Such training can be written and delivered by a recognised safeguarding expert or a Designated Safeguarding Lead. Training Now has a 'Safeguarding Induction' PowerPoint presentation for use as part of the safeguarding induction. Following this induction, all staff must be given the Training Now 'Our Guide to Safeguarding' leaflet to keep (see **Appendix 7**).

Annual Continual Professional Development (CPD) for all staff is to be delivered by the Designated Safeguarding Lead. This is recorded on the central staff training record. All staff should complete formal refresher training every three years. This is in addition to annual CPD activity. If there are any updates to policies, legislation, good practice or procedures in between these times, these will be explained to relevant staff through email, updates or team meetings.

In addition, all staff should receive regular safeguarding updates, including online safety (for example, via email, e-bulletins, staff meetings) as required, and at least annually, to provide them with relevant skills and knowledge to safeguard at risk adults effectively.

The Designated Safeguarding Lead and the Designated Deputy are also available to offer generic and specific information, advice and guidance to staff around day-to-day safeguarding matters either by phone or by email.

During both staff and apprentice inductions the Safeguarding Lead will be identified. All apprentices will be made aware of the safeguarding team and their responsibilities in safeguarding them as learners and direct them to the 'keeping safe' videos contained on the Training Now website.

<https://training-now.co.uk/safeguarding/>

14. Delivering Learning Safely

Working with only one learner or lone working

When you are working with only one apprentice or learner or without other staff working nearby, additional safeguards should be in place:

- Let the Employer Manager know that you are lone working or in a class with only one learner and keep them informed of your planned start and finish times
- Make sure that you are visible. For example, work in a central location in the building, keep the door open and ask other staff to walk past regularly
- It may be appropriate to ask the learner to find a more suitable place to learn if you cannot remain visible or feel you may become vulnerable.

15. Teaching Approaches

At Training Now, we promote the values of democracy, the rule of law, individual liberty, mutual respect and tolerance for those with different faiths and beliefs. We teach and encourage learners to respect one another and to respect and tolerate difference. All staff challenge assumptions that alienate others and take away their power. Our goal is to build mutual respect and understanding and use of dialogue not violence as a form of conflict resolution.

We will ensure that our teaching approaches will:

- Help learners become resistant to extremism by giving them skills, knowledge, understanding and awareness
- Develop a positive sense of identity through the development of critical thinking skills
- Create a 'safe space' for open discussion
- Help learners understand what is safe and acceptable behaviour regarding extremism and radicalisation

Delivering learning online safely

It is essential that learners are safeguarded from potentially harmful and inappropriate online material, especially as more learning is taking place online.

The number of potential issues within online safety is considerable, but can be put into four areas of risk:

- **content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- **contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g consensual and non-consensual

sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying); and

- **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your apprentices, learners or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

These can be referred to as the 4Cs.

Online safety needs to be routinely highlighted and included in all relevant policies as well as when planning the curriculum, staff development and the role and responsibilities of the designated safeguarding lead.

Delivering learning online has its own unique safeguarding implications over and above those which are normally important for delivering learning. These particularly apply to privacy and data protection, professionalism, safe use of technology and staff welfare.

Existing safeguarding policies still apply, so staff, apprentices and learners should be aware of their general responsibilities and the procedures for reporting safeguarding issues.

Staff delivering learning online should be aware of the following:

Privacy and Data Protection

- Each apprentice and all learners should agree to an online code of conduct before taking part in learning sessions. This should include agreements on recording, image sharing, language, punctuality, privacy for members of an apprentice or learner's household and other classroom norms such as respect and politeness.
- The time, date, attendance and length of online sessions with apprentices and learners should be documented, as appropriate. If necessary, live events can be recorded by staff (with consent from learners) in case of future dispute.
- Staff must be clear about how recordings will be stored, how long they will be kept for and who will have access to them in line with Article 5 of the Data Protection requirements.
- Where possible, staff should not use personal phones, emails or social media accounts to contact learners.
- If staff members are accessing apprentices or learners' contact details at home, they must comply with the General Data Protection Regulation and Data Protection Act 2018.
- Any resources shared should take licensing and copyright into account.

Professionalism

- When taking part in online learning, staff and learners should ensure they are in a private environment and make sure that backgrounds in videos do not share any personal information or inappropriate content.
- Staff should continue to follow professional appearance/behaviour expectations and maintain professional boundaries.
- One-to-one contact with any learner should only take place by telephone or written communication using a work phone (or a phone with a blocked number).

Safe use of technology

- All staff should use provider-approved communication channels and not use any personal accounts. This includes blocking personal phone numbers.
- Delivery staff should keep online sessions as invitation-only and maintain privacy settings on posted materials.

- Learners should be given information on how to turn off cameras if needed.
- Staff should be mindful of language and personal support to learners online as acceptable classroom behaviour can be misinterpreted online.
- All ICT equipment loaned to apprentices are monitored, have restricted download functionality and suspicious websites blocked.

E-responsibility and E-safety

See 'Acceptable Use of IT Policy 2023-24'.

Monitoring of IT Usage

Agincare and Training Now takes online safety very seriously. It has invested in systems and processes to protect both staff and apprentices. Internally Agincare have put in the following processes:

- Active directory – detailing all active users, with allocated access rights to certain information
- 2 factor authentication- all users go through a two-stage log in system to check the authenticity of the user access accounts.
- Standard controls – in place to ensure all users have the appropriate access rights on a need to know basis
- Internet access – all materials, content and downloads are monitored which is linked to the account user

All users are regularly reviewed, and those that no longer needs access are restricted to certain systems or removed. All activities such as login and log out times, including sites visited are monitored by the Agincare IT department. Any suspicious activities are immediately reported to the appropriate line manager.

Risk Assessments

Safeguarding is embedded as part of our Risk Assessment processes as detailed in the Health and Safety Policy and Procedures. In addition, a Prevent Duty Risk Assessment and Action Plan is in place.

Reporting a Colleague

Your first responsibility is to safeguard apprentices and learners and therefore any concerns about a colleague's conduct must be recorded and reported to a member of the Safeguarding team.

Do not disclose the fact that you are making a report to the individual concerned or any other colleagues.

If the concern is about your own Manager and/or the Safeguarding Lead, do not discuss the concern with them. These concerns must be reported to their Senior Manager who would complete the Safeguarding Record of Disclosure and Discussion Form ([Appendix 1](#)).

Further guidance on reporting a Colleague can be found in Agincare's Whistle Blowing Policy.

16. Visiting Speakers and Events

We encourage visits from external agencies and speakers to enrich the experiences of our apprentices and learners. However, it is important that we do not use agencies that oppose Training Now and Agincare's values and ethos. These values include "democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs".

We are responsible for vetting any visitors to make sure the safety, security and welfare of learners and staff are prioritised.

How to book external visitors to ensure safety:

1. Complete the Risk Assessment for any visitors (**Appendix 8**) before inviting any external speaker into any class. If there is a YES response to any of the 3 key questions, you must complete a Visiting Speaker Referral Form (**Appendix 9**) and send it to the Senior Management Team for agreement before the event can go ahead.
2. All visiting speakers must read and agree to the External Speaker Code of Conduct (**Appendix 10**).
3. Talk to the speaker about the content of their presentation before the event.
4. Ask the visiting speaker to bring identification and arrive in good time to sign in.
5. Supervise your visitors at all times and do not leave them alone with learners, unless a DBS certificate has been presented.
6. Bring to an end any presentation where the content proves unsuitable or offensive.
7. Complete an evaluation. This should make a note any contentious subject area or comments and state whether the speaker could be booked again in the future. Once a person has already visited, future checks should be proportionate.

If any member of staff has any concern regarding a venue or event they should contact the Designated Safeguarding Lead.

17. Statutory Framework

The key current guidance for education and training providers are:

- [Keeping children safe in education 2023: Statutory guidance for schools and colleges](#) (September 2023)
- [Revised Prevent duty guidance for England and Wales](#) - specific guidance on authorities in England and Wales on the duty of schools and other providers in the Counter-Terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism (HM Government 2015, updated Dec 2023)
- [What to do if you are worried a child is being abused](#) (March 2015)

The safeguarding of children is everyone's business and education providers have a responsibility under Section 175 of the Education Act 2002 to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of children. This includes:

- Preventing the impairment of children's health or development
- Protecting children from maltreatment
- Ensuring children grow up in circumstances consistent with the provision of safe and effective care.

The UN Convention on the Rights of the Child defines a child as everyone under 18 unless, "under the law applicable to the child, majority is attained earlier" ([Office of the High Commissioner for Human Rights, 1989](#)). The UK has ratified this convention. The Children Act 1989, 2004 defines a child as being up to the age of 18 years.

The Protection of Freedoms Act 2012 amends the definition of a 'vulnerable adult' in the Safeguarding Vulnerable Groups Act, 2006. An adult is defined as 'vulnerable' when they are in receipt of a 'regulated activity' in relation to vulnerable adults (section 65 and 66 of the Act). Vulnerable adults

are, or may be, in need of community services due to age, illness or a mental or physical disability and are, or may be, unable to protect themselves against significant harm or exploitation. 'Regulated activities' are the activities that the Disclosure and Barring Service can bar people from doing. This includes health care, personal care, social work and transporting vulnerable adults.

The Children Act 2004 places a duty on organisations and provides them with additional powers including a requirement to co-operate with the Children's Services Authority, to decide to safeguard and promote welfare, to share information where necessary and appropriate with the Local Safeguarding Children Boards.

The Safeguarding Vulnerable Groups Act 2006 (amended in 2012) places a duty on organisations to undertake relevant DBS checks before individuals are allowed to work with children or vulnerable adults.

The Counter-Terrorism and Security Act 2015 places a duty on organisations, in the exercise of their functions, to have 'due regard to the need to prevent people from being drawn into terrorism'.

The Care Act: safeguarding adults

The Care Act 2014 sets out a clear legal framework for how local authorities and other parts of the system should protect adults at risk of abuse or neglect.

Due to the amendments to the definition of 'vulnerable adult', adults accessing learning through Training Now are not necessarily 'vulnerable'. However, we recognise that we have a moral duty to safeguard the wellbeing of all our apprentices and learners and in particular those who are or may be 'in need of community care services by reason of disability, age or illness; and who is or may be unable to take care of him or herself against significant harm or exploitation'. (Department of Health 2000).

In the event of an individual who is considered to be 'vulnerable' for other reasons and there being concerns of abuse, we will follow our safeguarding procedures.

We review our policy and procedures annually to consider any new government legislation, regulations or best practice documents to ensure that staff and partners are kept up to date with their responsibilities and duties with regard to the safety and wellbeing of children and adults.

Policy Review Statement:	This policy will be reviewed and updated as necessary in line with legislation or business changes. All of Training Now's policies are reviewed at least once a year to ensure relevance and currency.
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Appendices


1. Safeguarding Record of Disclosure and Discussion
2. Welfare and/or Wellbeing Concern Form
3. Staff Training Matrix
4. Channel Referral Process
5. FE/HE Regional Prevent Co-ordinators
6. Vulnerability and Risk Indicators
7. Our guide to Safeguarding
8. External Speakers Risk Assessment
9. Visiting Speakers Referral Form
10. Visiting Speakers Code of Conduct

Appendix 1 - Safeguarding Record of Disclosure and Discussion

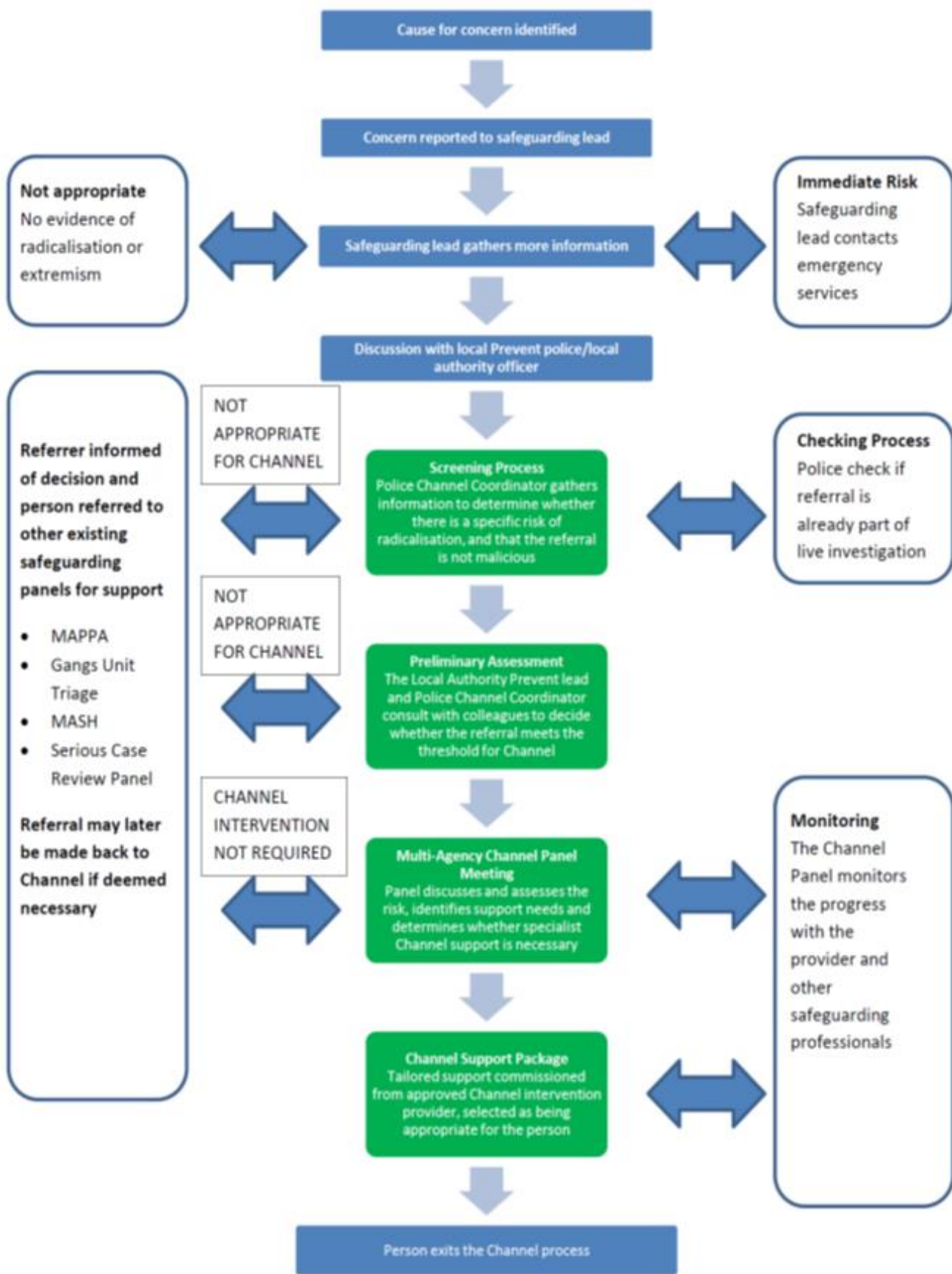
Note: Don't forget to explain confidentiality limits!	
Interviewer/Staff Name:	
Employer:	Interviewer contact telephone number:
Allegations - It is important that all allegations, suspicions and complaints are taken seriously. It is better to act on concerns than to ignore them.	
Ensure that you make notes of the following (however, do not ask any leading questions).	
Date:	Time:
Name of complainant:	Complainant contact telephone number:
Nature of alleged abuse or incident: Account of allegation and any injuries observed (do not ask to see any injuries that are not obvious).	
Date and time of incident – as accurate as can be recalled:	
Where incident took place, if volunteered:	
Action you have taken (if any):	
Now refer this information to your Designated Safeguarding Lead who will take follow up action. If they are unavailable, refer to the contacts below.	
Date, time and to whom referred:	

Note: If you feel distressed as a result of your discussion, please contact your line manager to discuss a confidential debriefing or to arrange counselling support.

Appendix 3 – Staff Training Matrix

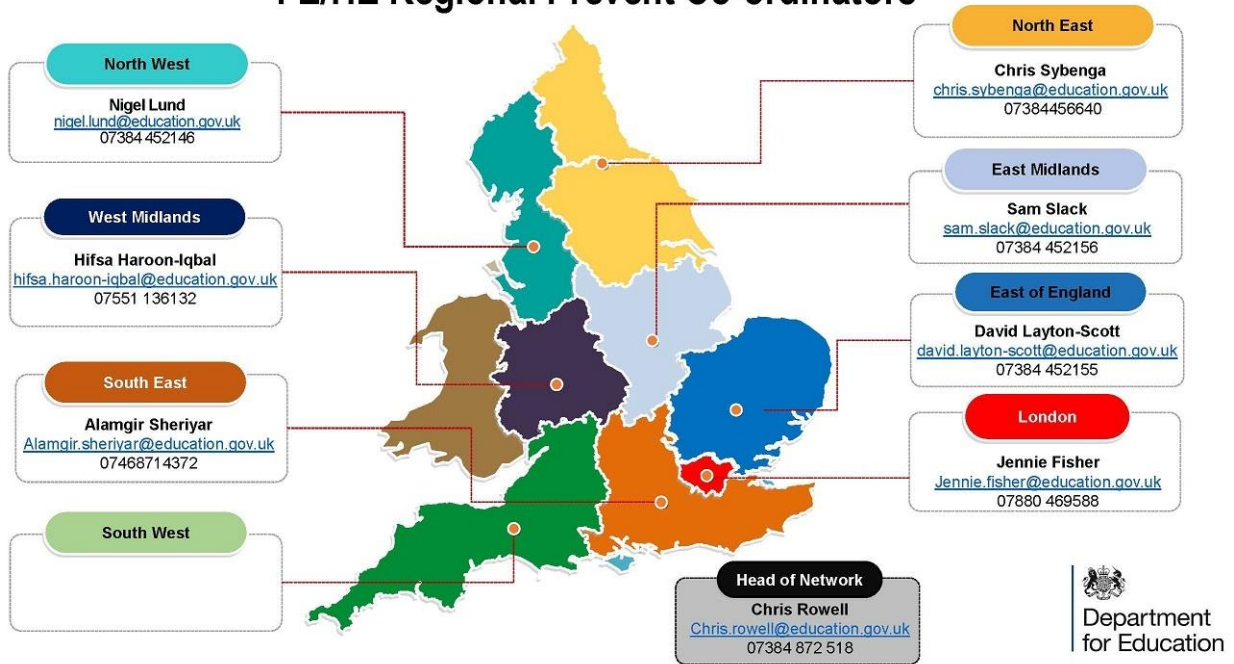
Training	Delivered by	By When	Resources
All staff: Mandatory Safeguarding Induction	DDSL	1 st week of employment	Our guide to safeguarding  Our guide to Safeguarding (STAFI) Induction PowerPoint Keeping Children Safe in Education 2023
All staff: Mandatory Safeguarding Training	ETF/KALI	Within first 6 weeks of employment	Safeguarding in the FE and Training Sector Prevent for education and training GDPR (KALI) FGM (KALI) FGM (from Dec 21) Honour Based Violence and Forced Marriage (Adult Social Care) KALI Digital Safeguarding for the FE and Training Sector What is County Lines? EduCare County Lines (KALI) Child Sexual Exploitation (KALI) Personal Resilience (KALI) Stress Awareness (KALI) Suicide Prevention Awareness (KALI) Self-Harm (KALI) Coercive Control (KALI)
All staff: Mandatory Annual Update	DSL /DDSL	Annually	
DSL/DDSL: Designated Lead Training		Every 2 years	
Managers: Safer recruitment in FE training	ETF	When needed	Safeguarding and Safer Recruitment in FE
Board Members: Safeguarding governor	ETF	When needed	Safeguarding in FE Prevent Advancing Equality
Mental Health First Aid	MHFA Lead	Every 3 years	

Appendix 4 – Channel Referral Process



Appendix 5 – FE/HE Regional Prevent Co-ordinators

FE/HE Regional Prevent Co-ordinators



South West

Contact: Currently recruiting to fill this vacancy

Email: HEFEPrevent.COORDINATORS@education.gov.uk

If you need to contact someone from the South West, use the contact from the South East:

Contact: Alamgir Sheriyar

Email: alamgir.sheriyar@education.gov.uk

Telephone: 07468 714 372

Appendix 6 - Vulnerability and Risk Indicators

Vulnerability

- Identity Crisis: Distance from cultural or religious heritage and uncomfortable with their place in the society around them
- Personal Crisis: Family tensions; sense of isolation; adolescence; low self-esteem; disassociating from existing friendship group and becoming involved with a new and different group of friends; searching for answers to questions about identity, faith and belonging
- Personal Circumstances – Migration; local community tensions; events affecting country or region of origin; alienation from UK values; having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy
- Unmet Aspirations – Perceptions of injustice; feeling of failure; rejection of civic life;
- Criminality – Experiences of imprisonment; poor resettlement/ reintegration, previous involvement with criminal groups

Access to extremism / extremist influences

- Is there reason to believe that the individual associates with those known to be involved in extremism - either because they associate directly with known individuals or because they frequent key locations where these individuals are known to operate (e.g. the individual is the partner, spouse, friend or family member of someone believed to be linked with extremist activity)?
- Is there evidence to suggest that the individual is accessing the internet for the purpose of extremist activity? This may include the use of closed network groups, access to or distribution of extremist material, covert associate contact via online communication methods such as email or social media etc.
- Is there reason to believe that the individual has been or is likely to be involved with extremist/military training camps or locations?
- Has the individual known to have possessed or actively seeking to possess and/or distribute extremist literature or any other media material likely to incite racial and/or religious hatred or acts of violence?
- Does the individual sympathise with, or support illegal/illicit groups?
- Does the individual support groups with links to extremist activity?

Experiences, Behaviours and Influences

- Has the individual encountered peer, social, family or faith group rejection?
- Is there evidence of extremist ideological, political or religious influence on the individual from within or outside UK?
- Have international events in areas of conflict and civil unrest had a personal impact on the individual resulting in a noticeable change in behaviour?
- It is important to recognise that many people may be emotionally affected by the plight of what is happening in areas of conflict however it is important to differentiate them from those that sympathise with or support extremist activity
- Has there been a significant shift in the individual's behaviour or outward appearance that suggests a new social/political or religious influence?
- Has the individual come into conflict with family over religious beliefs/lifestyle/dress choices?
- Does the individual vocally support terrorist attacks; either verbally or in their written work?

- Has the individual witnessed or been the perpetrator/victim of racial or religious hate crime or sectarianism?

Travel

- Is there a pattern of regular or extended travel within the UK, with other evidence to suggest this is for purposes of extremist training or activity?
- Has the individual travelled for extended periods of time to international locations known to be associated with extremism?
- Has the individual employed any methods to disguise their true identity? Has the individual used documents or cover to support this?

Social Factors

- Does the individual have experience of poverty, disadvantage, discrimination or social exclusion?
- Does the individual experience a lack of meaningful employment appropriate to their skills?
- Does the individual display a lack of affinity or understanding for others, or do they show social isolation from their peer groups?

Appendix 7 – Our guide to Safeguarding

Our guide for safeguarding is a tri-fold leaflet for all staff to keep as a general overview Training Now's Safeguarding Practice.

What is my responsibility?

- Undertake training in the Prevent Duty
- Be aware of when it is appropriate to refer concerns about apprentices, learners or colleagues to the Designated Safeguarding Lead
- Report concerns where these arise, be vigilant
- Exemplify values of "democracy, the rule of law, individual liberty & mutual respect & tolerance for those with difference faiths & beliefs" within your professional practice & to your apprentices & learners.

E-Safety

E-safety is providing our apprentices & learners with the information they need to help them to make safe & sensible choices when using the internet, IT systems & staying within the law.

What are the 4 areas of risk?

Content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation & extremism.

Contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising & adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

Conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending & receiving explicit images (e.g consensual & non-consensual sharing of nudes & semi-nudes &/or pornography, sharing other explicit images & online bullying); &

Commerce: risks such as online gambling, inappropriate advertising, phishing & or financial scams.

What are my responsibilities?

- Teach your apprentices & learners to be safe online & embed this into learning sessions
- Teach your apprentices & learners about keeping within the law online, including copyright, Data Protection & libel
- Act as a role model when you are online & using ICT
- Pre-check websites you recommend to apprentices & learners
- Keep an eye on what learners are doing in a learning session if they are online
- Maintain the code of conduct
- Report any concerns.

Recognise Respond Report

It is never ok to do nothing.

Once you have identified a concern, or there has been a disclosure, take the following action:

1. Inform your apprentice or learner that you have concerns about them and will be reporting this to the DSL. If there is immediate risk of injury, security or medical assistance is needed - **call 999**
2. Complete the Record of Disclosure and Discussion and forward to the DSL
3. If there is no breach of confidentiality, the DSL will keep you updated on the action taken or required.

You need to: Be approachable • Listen carefully, uncritically and at the learner's pace • Take what is said seriously • Clarify essential information • Reassure • Tell the learner what will happen next • Tell the Designated Safeguarding Lead without delay • Record the incident and complete a Record of Disclosure or Discussion

You must not: Investigate • Try to resolve • Promise confidentiality • Make assumptions

Training Now

Learn | Achieve | Succeed

Our Guide to Safeguarding

(including Prevent & e-safety)

For all Training Now Staff

Designated Safeguarding Leads

Tara Roudiani, Managing Director:
07458 093436, tara.roudiani@training-now.co.uk
Laura Lawson, Welfare & Support Manager:
07758 892289, laura.lawson@training-now.co.uk

Safeguarding Officers

Scott Jones, Operations Director:
07976 648974, scott.jones@training-now.co.uk
Jo Stone, Learning & Quality Manager:
07458 111870, joann.stone@training-now.co.uk
Jo Mackay, Delivery Manager:
07834 535318, Jo-AnneMackay@training-now.co.uk

Safeguarding Governor

Kaye Berry

DEVELOPMENT | APPRENTICESHIP | TRAINING

What is Safeguarding?

Safeguarding is about protecting the health, wellbeing & human rights of individuals. These measures allow children, young people & adults at risk to live free from abuse, harm & neglect.

What is Prevent?

The Prevent duty lays out our responsibility for preventing people from being drawn into extremism, radicalisation or terrorism.

Safeguarding Summary

Apprentices & Learners

- The welfare of our apprentices & learners is paramount
 - All our apprentices & learners have the right to protection from any type of abuse regardless of gender, age, ethnicity, disability, sexuality or beliefs
 - All apprentices & learners are informed about our Safeguarding & Prevent Policy & Procedures at induction & reminded of these throughout the course.
- Policy**
- We have a Safeguarding & Prevent Policy that applies to all people who work for our organisation & for our apprentices & learners
 - If you have a concern about an apprentice, learner or member of staff, you follow the procedure in this Policy
 - We take all concerns & allegations of abuse very seriously & all our managers & staff will respond appropriately. This may include referral to Social Services, Channel programme or the Police.

Staff

- All our staff must remain vigilant & report concerns immediately
- We are committed to safe recruitment, selection & vetting
- All staff & volunteers must have appropriate training & be confident that they know & learn how to protect our apprentices & learners within their roles & responsibilities.

What are we safeguarding our learners from?

Bullying, Cyber bullying • Child Criminal Exploitation (CCE) • Child Sexual Exploitation (CSE) • Crime & fear of crime • Criminal Exploitation (County Lines) • Cuckooing • Cyber bullying • Discriminatory abuse • Domestic abuse • Female Genital Mutilation (FGM) • Financial abuse • Forced marriage • Gaslighting • Grooming (including via the internet) • Homelessness highlighted as vulnerability • Honour-based abuse • Inappropriate supervision by staff i.e. bad practice • Institutional abuse • Modern slavery • Neglect • Peer on peer abuse • Physical abuse • Psychological/Emotional abuse • Radicalisation & extremism • Self-harm • Sexual abuse (including peer-on-peer, inappropriate relationships & online) • Sexual exploitation • Sexual harassment • Victimisation due to race, sexuality, faith, age, gender, disability

Who are the potential abusers?

Family members, friends & acquaintances • Strangers • Terrorist organisations • Staff including assessors & agency staff • Externally contracted staff e.g. security, cleaning staff • Volunteers • Other apprentices, learner & their peers • Themselves • Anyone else

Prevent

The aim of Prevent is to stop people becoming or supporting terrorists by challenging the spread of terrorist ideology. Our duty is to have due regard to the need to prevent people from being drawn into terrorism, radicalisation or extremism. We also work to safeguard our apprentices & learners to protect & divert them away from being drawn into this activity. This is part of our wider Safeguarding remit.

As part of this, we have a statutory duty to safeguard our apprentices & learners to keep them both safe & within the law & we commit to promoting Values in Britain.

Values in Britain include:

Democracy: the right to be heard

Rule of Law: to abide by the law

Individual Liberty: free to be ourselves without prejudice

Mutual respect & tolerance of those with different faiths or beliefs: listening to others & respecting their opinions, even when you don't agree with them or they are not your beliefs.

Our role & responsibilities are to teach & encourage our apprentices & learners to respect one another & to value the experience & diversity each of them brings.

What is Extremism?

Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty & mutual respect & tolerance of different faiths & beliefs; &/or calls for the death of any person, whether in this country or overseas.

Why might someone be drawn towards extremist ideology?

- Questions about identity, faith, belonging
- Desire for 'adventure' & excitement
- Enhance their self-esteem & promote 'street cred'
- Involvement & identification with a charismatic individual & attraction to a group that can offer support & a social network
- A trigger from a personal experience of racism or discrimination

Recognising Extremism - early indicators may include:

- Showing sympathy for extremist cause
- Glorifying violence
- Evidence of possessing illegal or extremist literature
- Advocating messages similar to illegal organisations, eg use of extreme violence against individuals or groups
- Out of character changes in dress, behaviour & peer relationships

Appendix 8 – External Visitor Risk Assessment

Part 1: Event Organiser details:
Name:
Contact details (phone no. and email):
Part 2: Proposed event details:
Speaker's name:
Speaker's role:
Speaker's organisation:
Proposed event title:
Proposed event date:
Event description (max 50 words, including topics to be discussed):
Target audience (profile and size). <i>Please give details if you believe the event will attract any groups or individuals that have previously been known to express views which may conflict with the Visiting Speaker Code of Conduct or Training Now or Agincare's values and ethos.</i>
Proposed External Speaker(s): <i>Please include links to biographical information and give details if you believe that any of your proposed speakers have previously been prevented from taking part in an event at any educational establishment</i>

Assessment of proposed external speaker(s)

Prior to the confirmation of any external speaker, the event organiser will be responsible for assessing the speaker against the following set of questions:

Question 1: Has the speaker previously been prevented from speaking at Training Now or Agincare, another learning provider/higher education/further education provider or similar establishment, or previously been known to express views that may be in breach of the External Speaker Code of Conduct? **YES / NO**

Question 2: Does the proposed title or theme of the event present a potential risk that views/opinions expressed by speakers may be in breach of the Visiting Speaker Code of Conduct? **YES / NO**

Question 3: Is the proposed speaker/theme likely to attract attendance from individuals/groups that have previously been known to express views that may be in breach of the Visiting Speaker Code of Conduct? **YES / NO**

If the answer to all three questions is no, the event organiser can submit this form to a member of SMT to confirm the external speaker and proceed with organising the event.

If the answer to any of the questions is unclear, the event organiser must seek guidance from a DSL, whose responsibility it will be to further review the speaker(s) against the questions above.

If the answer to any of the questions is yes, it is the responsibility of the event organiser to submit a referral to SMT for consideration.

To make a visiting speaker referral submission:

1. Complete the **Visiting Speaker Referral Form** (see below)
2. Complete all sections of the form with as much detail as possible.
3. Send the form as an attachment to SMT

In all cases where the event will proceed please send the speaker a copy of the Visiting Speaker Code of Conduct.

Approval notification

I undertake that, to the best of my knowledge, the information provided on this form is correct.

Signed **Event organiser**

Appendix 9 - Visiting Speakers Referral Form

If a proposed visiting speaker has an answer of **YES** to **ANY** of **3** key questions on the **Visiting Speaker Risk Assessment**, this form must be completed in full and passed to a member of Training Now's SMT for approval (alongside the original Risk Assessment).

Part 1: Event Organiser details:

Name:

Contact details (phone no. and email):

Part 2: Proposed event details

SPEAKER DETAILS

Speaker(s) name:

Speaker(s) address:

Speaker(s) phone number:

Speaker(s) email:

Speakers website/YouTube/Social Media URLs:

Speaker(s) organisation (if applicable):

Organisation's details (e.g. address, website, company number):

Does the speaker or members from the organisation they represent have a reputation for causing disruption at venues?

Are there likely to be any health and safety or public order issues that may occur as a result of this event?

EXPANDED RISK ASSESSMENT OF PROPOSED EXTERNAL SPEAKER(S)

Provide an explanation of the following questions from the **Risk Assessment** you answered **Yes** to:

1. Has the speaker previously been prevented from speaking at any learning establishment, further education or higher education provider or similar educational establishment? Have they previously been known to express views that may be in breach of the Visiting Speaker Code of Conduct?
2. Does the proposed topic or theme of the event present a potential risk that views/opinions expressed by speakers may be in breach of the Visiting Speaker Code of Conduct?
3. Is the proposed speaker/theme likely to attract attendance from individuals/groups that have previously been known to express views that may be in breach of the External Speaker Code of Conduct?

EVENT DETAILS

Event title:

Has speaker presented the same or similar topic before?

If Yes, has the topic met regionally or nationally with any criticism or hostility when it has been hosted before?

Is the speaker requesting special conditions such as a closed meeting, tickets or segregation?

Has any pressure (either direct or indirect) been put on anyone to run or not to run this event e.g. community pressure to run the event or objections by some people to run it?

Part 3: Protocol checklist:

1. Scanning

Has the speaker request been received by the Senior Management Team at least 20 working days in advance of the planned event? **Yes/No**

Has the speaker request been forwarded to Local Authority, and the Police Service (if appropriate) at least 5 working days in advance of the planned event? **Yes/No**

Has the transcript of the speech been submitted to the authorising staff member? Yes/No

Has the speaker provided a proof of identity? **Yes/No**

Has a reference file been collated? **Yes/No**

Is there a staff member with clear responsibility for collating information and liaising with partner agencies? **Yes/No**

2. Analysis:

Have open source checks been carried out on the following:

- published material
- previous speech content
- known affiliations
- aliases

Have the open source enquiries been documented and referenced? Yes/No

If there are concerns or anxieties, have the following partners been informed:

- Agincare Group Ltd **Yes/No**
- Local Authority Prevent Lead **Yes/No**
- Police Service **Yes/No**

Has the reference file been updated with new information?

3. Response

Does the visiting speaker or the intended presentation breach any condition of the Visiting Speaker Code of Conduct? **Yes/No**

Has the speaker been given permission to present? **Yes/No**

If yes, has the speaker received information Training Now's code of conduct and safeguarding principle? **Yes/No**

Has a reference file been updated with justification as to why the visiting speaker was authorised /declined?

Which member of staff has authorised the speaker?.....

4. Assessment (after the event)

Did the speaker comply with the Provider's Visiting Speaker Code of Conduct and Safeguarding Principles?

Did the speaker contribute to the objective of the event?

Would the Provider invite this speaker again? If no, why not?

Has the reference file been updated?

Response to External Speaker Referral Form

SMT response:

Date:

Appendix 10 – Training Now - Visiting Speakers Code of Conduct

Introduction

This code of conduct is in place to ensure that all visiting speakers, external speakers and external organisations taking part in any event or session funded by Training Now via Agincare Ltd act in accordance with the law and do not breach the lawful rights of others.

It is the responsibility of the event organiser to ensure that any visiting speaker has read and agrees to abide by this Code of Conduct and that the Code of conduct is communicated to all external speakers.

Conduct

It is expected that no visiting speaker will:

- Act in breach of criminal law
- Incite hatred or violence or any breach of the criminal law
- Encourage or promote any acts of terrorism or promote individuals, groups or organisations that support terrorism
- Spread hatred and intolerance
- Discriminate against or harass any person or group on the grounds of their sex, race, nationality, ethnicity, disability, religious or other similar belief, sexual orientation or age
- Defame any person or organisation
- Use the speaking opportunity to raise or gather funds for any external organisation.

The visiting speaker will also abide by and follow all policies relating to health & safety, safeguarding, Prevent and the acceptable use of any ICT systems. They will not present ideas and opinions that may be contentious or potentially offensive and they should be prepared to be open to debate, challenge and questions.

Training Now has a duty under the Equality Act 2010 as an education provider, employer and service provider not to unlawfully discriminate against any apprentices and/or learners, employees and any other individuals to whom services are provided. As such, segregation by sex is not permitted in any academic meetings, events, learning sessions or meetings provided for learners. This includes any event covered by this visiting speakers Code of Conduct. The only exception to this is events that are for the purpose of collective religious worship.