

Safeguarding – Our Policy

Safeguarding Children, Young People and Vulnerable Adults

Version: 4.0, effective from October 2024

Policy Summary: The Safeguarding Policy is a summary of the Cheynes Training approach to the safeguarding of children, young people and vulnerable adults involved with our programmes. The policy has been updated to incorporate changes introduced in the 2024 Keeping Children Safe in Education review. This policy is promoted and distributed to each academy and subcontractors contracted to work with Cheynes Training prior to the effective date. Training in safeguarding is provided to all senior managers and team members.

Statement on the Safeguarding Policy at Cheynes Training

Our approach to safeguarding is based upon respect for, and an unreserved commitment to, safety, fairness, and equality of opportunity for all, but especially for learners under the age of 18 and vulnerable adults.

Cheyne Training has a duty of care for the learners involved in our programmes. We believe that all learners deserve to be happy and secure in their working and learning activities and their parents or guardians need to feel confident that the people in charge of these activities are trustworthy, responsible and will do everything possible to keep learners safe from harm. Having effective safeguards in place protects and promotes the welfare of learners, especially those under the age of 18 and vulnerable adults.

We liaise closely with the organisations we work with to provide a safe and secure environment within which learners can work and train and we will continue to make every effort to identify anyone who is at risk of harm during their involvement with Cheynes Training. In addition, we will ensure the representatives of Cheynes Training receive training which would allow them to identify learners who would benefit from early intervention.

We recognise the possibility that individuals involved in our programme could pose a threat to learners, especially those under the age of 18 and vulnerable adults and it is our duty to put in place safeguards to protect all learners we work with.

Cheyne Training also aims to avoid placing employees and representatives in positions where abuse might be wrongly alleged and to ensure that everyone involved in our programmes know the dangers this could pose. Our overriding emphasis, however, is firmly on protecting those under the age of 18 and vulnerable adults from any form of abuse and to actively promote the welfare of all learners on our learnership programmes.

We continually review and monitor our safeguarding policy and our procedures, adding further advice and information wherever possible. Our Safeguarding Policy and procedures are reviewed annually or whenever important new developments in safeguarding take place.

One such new development is the introduction of the new statutory safeguarding guidance entitled 'Keeping Children Safe in Education, last updated in 2024. We have addressed this guidance and added an annex to this policy (Appendix 4 which came into force on 1st September 2022).

Melanie Mitchell, Managing Director
Cheynes Training
30 October 2024

1 Introduction

- 1.1 Cheynes Training provides learning opportunities for young people under the age of 18, and for older learners, some of whom may be classed as vulnerable. We work closely with employers and partner organisations to offer support and guidance in areas relating to the selection, recruitment and enrolment of learners, initial assessment, induction and the planning of learning, the delivery of teaching and learning and reviewing progress, assessment and verification, and achievement and end point assessment of learners.
- 1.2 The responsibility for safeguarding learners under the age of 18, and vulnerable adults, extends to all learning providers, we must all demonstrate a strong commitment to ensuring that the health, safety, and wellbeing of learners is paramount.
- 1.3 Employees and representatives of Cheynes Training, including the employees of academy partners (subcontractors), meet frequently with learners registered on our programmes and we recognise that we have a moral and legal obligation to protect all learners, especially those under the age of 18 and vulnerable adults, who may be at risk from abuse.
- 1.4 We ensure that all our delivery team, including those at the academy partners (subcontractors) we work with, understand and follow our policies and procedures and know their individual responsibilities. We also ensure all team members have appropriate checks prior to taking on their responsibilities and have the skills and knowledge and have received training in safeguarding and child protection.

2 Information and Training

- 2.1 All employees and representatives of Cheynes Training have regular safeguarding training and are aware of our Safeguarding Policy and procedures which are designed to make our programmes safe for learners, especially those under the age of 18 and vulnerable adults.
- 2.2 We also provide information and training on safeguarding to all learners on our programmes, the information is accessed via the Apprentice Zone on the Cheynes Training website where there is information about the following:
 - Safeguarding – an explanation of what this means for learners
 - Focus on Wellbeing – advice to learners on how to stay fit and healthy
 - Safe Surfing – information on the hidden dangers of surfing the internet
 - Support Agencies – comprehensive list of support available to learners

The training we provide is undertaken using carefully selected on-line safeguarding modules.

All learners also have an e-portfolio (Smart Assessor) which includes our Safeguarding Lead's contact details and a suite of wellbeing resources.

- 2.3 Alongside our Safeguarding Policy, Cheynes Training has developed a set of safeguarding procedures and a number of resources that are downloadable from our website at www.cheynestraining.com by searching 'Safeguarding' The website also contains links to our Safeguarding Code of Conduct, our Safeguarding Disclosure Declaration and our Safeguarding Policy (this document).

3 The Rights of Learners – our Values and Beliefs

- 3.1 The rights of learners, especially those under the age of 18, and vulnerable adults, underpins our work and we strongly believe that all learners have the right to work and learn in a caring and safe environment free from abuse and to expect that those in positions of responsibility will do everything possible to protect that right.
- 3.2 The primary duty of all adults, including the employees and representatives of Cheynes Training, is to protect those under the age of 18 and vulnerable adults from harm.
- 3.3 The protection of learners from abuse is part of the general responsibility of all employees and representatives of Cheynes Training and the employers we work with.
- 3.4 Responsibility for safeguarding learners under the age of 18 and vulnerable adults, is shared because learners can only be protected when all organisations and individuals involved remain vigilant and accept responsibility for protecting young people and vulnerable adults.
- 3.5 All learning services delivered by the employees and representatives of Cheynes Training will be done so within an ethical and professional framework; please refer to Appendix 1 for a copy of the Cheynes Training Safeguarding Code of Conduct and Appendix 2 for the Cheynes Training Safeguarding Disclosure Declaration.

4 Definitions

- 4.1 Under the Children Act 2004, a child is a person under the age of 18. In addition, it is also a person aged 18, 19 or 20 who has been in care since the age of 16 or a person aged 18, 19 or 20 who has a learning disability.
- 4.2 A vulnerable adult is a person aged 18 years or over, who is in receipt of or may need community care services by reason of 'mental or other disability or illness and who is or may be unable to take care of him or herself or unable to protect him or herself against significant harm or exploitation'.
- 4.3 The Cheynes Training Safeguarding Officer is the person to whom employees and representatives of Cheynes Training are directly responsible to with regards to safeguarding learners under the age of 18 and vulnerable adults.
- 4.4 There are four types of abuse which would prompt a safeguarding investigation, these are: physical abuse; sexual abuse; emotional abuse; neglect (see 6 below).
- 4.5 All adults should be aware that any form of abuse may be committed by a person of the same or similar age to the victim (referred to as child-on-child abuse). This type of abuse often leads to others from the peer group joining in and adding to the abuse.
- 4.5 The Prevent Duty requires all those involved in teaching and assessment of learners to do all in their power to keep people safe from radicalisation and extremism, including far-right extremism. Prevent Duty requirements form part of the safeguarding responsibilities of organisations and is covered in the related Cheynes Training Prevent Duty policy.
- 4.6 Although most learners registered on Cheynes Training programmes have reached the age of 16, we occasionally work with learners who are under the age of 16 and it is important to note that the age of consent for sexual activity is 16 years. Any sexual activity involving persons when one or more of the persons involved is aged 15 or under is unlawful.
- 4.7 Underage sex may involve child abuse and may therefore require a referral to the Cheynes Training Safeguarding Officer who has the responsibility to report this to the appropriate bodies, either the Local Authority Social Services department or the Police.

5 Roles and Responsibilities

Below is an overview of the key responsibilities for different roles involved in safeguarding.

Designated Safeguarding Lead

- 5.1 Managing Referrals: Referring cases of suspected abuse to local authorities, the Disclosure and Barring Service, and the police as needed. The Safeguarding Lead also liaises with the senior management team and other agencies for ongoing investigations, noting that we remain responsible for the safeguarding of a learner should they be placed with an alternative provision provider.
- 5.2 Recording concerns and referrals: Ensuring the learner files are kept up to date, keeping information confidential and securely stored. Recording a clear and comprehensive summary of the concerns and how it was followed up and resolved. Notes of any action taken should also include a rationale for the decisions made.
- 5.3 Training: Ensuring all staff understand the symptoms of child abuse and neglect and receive appropriate training every two years. They must also keep detailed records of training received by each staff member.
- 5.4 Raising Awareness: Ensuring the safeguarding policies are known and used appropriately, and that the child protection policy is reviewed annually. They also ensure the policy is publicly available and that child protection files are transferred securely when apprentice move provider
- 5.5 Filtering and Monitoring: Understanding the filtering and monitoring software systems each academy have in place.

Cheyne Training Ltd board of directors

- 5.6 Policy Oversight: Ensuring the safeguarding policy and procedures are reviewed periodically and effectively implemented.
- 5.7 Monitoring and Reporting: Regularly monitoring safeguarding work, including reviewing the risk register and reporting findings. They also ensure safeguarding is included in board meetings.

Cheyne Training managing director

- 5.8 Leadership and Culture: Promoting a culture of openness and ensuring all concerns are promptly investigated. They also provide updates to the board of directors on safeguarding practices.
- 5.9 Resource Allocation: Ensuring the senior management team at Cheynes Training has the resources to implement safeguarding policies across all areas of work.

Cheyne Training team members

- 5.10 Understand Policies: Be familiar with the safeguarding policy and undertake appropriate training.
- 5.11 Report Concerns: Recognise signs of harm, exploitation, abuse, and neglect, and know how to report safeguarding concerns appropriately.

Responsibilities for Investigating Incidences of Suspected Child Abuse

- 5.12 Two agencies have a statutory right to undertake a child protection investigation, the Local Authority Social Services department and the Police
- 5.13 Employees and representatives of Cheynes Training are not responsible for diagnosing, investigating, or providing a remedial response to abuse. They do have a responsibility to be alert to signs of abuse shown by a learner under the age of 18 and vulnerable adults. Not all concerns about young people relate to abuse, there may be other explanations. It is therefore important to keep an open mind and consider what is known about the learner and their circumstances. All employees and representatives have a responsibility to report any suspected abuse to the Cheynes Training Safeguarding Lead.
- 5.14 Any suspected abuse must be immediately reported to the Cheynes Training Safeguarding Lead by telephoning the designated safeguarding phone number on **07816 335015**. Delays in making a referral are unacceptable and may lead to a person, especially someone under the age of 18 or a vulnerable adult, being placed at risk of harm.
- 5.15 Any member of the Cheynes Training management team has a duty to make a referral if they feel that an employee or representative of Cheynes Training is failing to appreciate a risk to a learner.

Please note: It is essential to understand the importance of explaining to a person who may have been abused that the laws are in place to protect them rather than to criminalise. Also, a wrong course of action in response to a suspicion of abuse can have a negative impact on the outcome of a child protection investigation. If evidence arises which suggests anyone other than the Social Services or the Police attempt to undertake an investigation it could seriously undermine a successful child protection action. The correct referral process is shown in the chart at Section 10.

6 Types of Indicators and Abuse

A person may abuse a learner under the age of 18 or a vulnerable adult by inflicting harm, or by failing to act to prevent harm from being inflicted by others. Types of abuse include:

- 6.1 Physical Abuse - physically hurting or injuring another person by hitting or otherwise causing physical harm.
- 6.2 Sexual Abuse - where a person under the age of 18 and vulnerable adults, is used by others to meet the abuser's sexual needs. This includes using sexually explicit language, showing pornographic material, inappropriate touching to having full sexual intercourse.
- 6.3 Child-on-child Sexual Abuse – this can occur through a group of children sexually assaulting or harassing a single child or group of children. This can occur online or face-to-face, both physically and verbally.
- 6.3 Emotional Abuse - persistent emotional ill-treatment of a person that causes severe adverse effects on their emotional development. It may involve telling a person that they are worthless or inadequate, causing a person to feel frightened which may make the person very nervous and withdrawn. All types of ill-treatment involve emotional abuse.
- 6.4 Neglect - where a person's basic physical and psychological needs are not met, this is likely to result in serious impairment of health or development, examples include failing to protect from physical harm, forcing them to leave the safety of the family home, etc.
- 6.5 Exposure to radicalisation - where a person is exposed to radicalisation and all forms of extremism. This is covered more fully in the related Prevent Duty policy.

- 6.6 Domestic and family violence – where a person sustains injuries during incidents of domestic violence, suffers fear of home or specific family members or witnesses/hears violence towards others or experience its effects.
- 6.7 Commercial or other exploitation of a child - refers to the unethical and often illegal use of an individual for financial gain or other advantages. This practice involves treating a person as a commodity or object rather than a human being with rights and dignity.
- 6.8 County Lines - is a form of criminal exploitation where urban drug gangs expand their operations to smaller towns and rural areas. Gangs typically exploit children, young people, and vulnerable adults to move and sell drugs, as well as to store drugs and money.
- 6.9 Indicators of Abuse - Indications that a person may be experiencing abuse vary considerably and may include:
- Unexplained or suspicious injuries such as bruising, cuts or burns
 - deliberately avoiding Social Services for fear of being taken into care
 - a person describes what appears to be an abusive act involving him/her
 - someone else expresses concern about the welfare of another person
 - unexplained changes in behaviour (e.g. becoming very quiet or withdrawn)
 - inappropriate sexual awareness or engaging in sexually explicit behavior
 - distrust of adults, especially those with whom a close relationship would be expected
 - has difficulty in making friends or is prevented from socialising with other people
 - displays variations in eating patterns including overeating or loss of appetite
 - loses weight for no apparent reason
 - becomes increasingly dirty or unkempt.
- 6.10 Abuse takes many forms, and the above list is not exhaustive. Also please note that the presence of any of the indicators is not proof that abuse is taking place. Any concerns about possible abuse involving a young person under the age of 18 and vulnerable adults, must be raised with the Cheynes Training Safeguarding Lead.

7 Peer-on-peer Abuse

- 7.1 It is important to recognise that in some cases of abuse, it may not be an adult abusing a young person or a vulnerable adult, but a young person or group of young people. This is often referred to as peer-on-peer abuse. We must make it very clear that the dangers of this type of abuse occurring in an education setting means that Cheynes Training takes a zero-tolerance approach any learner who engages in this type of activity which could lead to them being excluded from the programme.
- 7.2 Peer-on-peer abuse involves bullying and deliberately hurtful behaviour, usually repeated over a period of time, where it is difficult for those affected to defend themselves. In addition to physical harm, peer-on-peer abuse often involves texting, emailing or posts on social networking sites.
- 7.3 Bullying can include:
- Physical (e.g. hitting, kicking, etc.)
 - verbal (e.g. name calling, constant teasing, sarcasm, racist or homophobic taunts)
 - emotional (e.g. tormenting, ridiculing, humiliating and ignoring, etc.)
 - sexual (e.g. unwanted physical contact or abusive comments, etc.).

7.4 There are a number of signs that may indicate that a young person is being affected:

- Behaviour changes such as reduced concentration and /or becoming withdrawn, depressed, tearful, emotionally 'up and down'
- a drop off in performance at work or in training
- physical signs, minor illnesses, difficulty in sleeping, bruising, damaged clothes
- Increased sickness record. Unexplainable and/or persistent absence from education
- bingeing on food, cigarettes, alcohol or drugs
- a shortage of money or frequent loss of possessions.

8 Potential Risks in the Context of Cheynes Training's Activities

There are several specific safeguarding risks that we as an apprenticeship training provider need to be aware of:

- 8.1 Workplace exploitation: Apprentices may be vulnerable to exploitation in their work environment, including excessive work hours, unsafe conditions, or tasks beyond their skill level.
- 8.2 Online safety risks: With increased use of digital technology in training, apprentices may face online dangers such as cyberbullying, grooming, or exposure to inappropriate content.
- 8.3 Age-related vulnerabilities: Many apprentices are young people (16+) who may be less experienced in workplace settings and more susceptible to certain risks.
- 8.4 Abuse or neglect outside the workplace: We need to be alert to signs of potential abuse or neglect occurring in apprentices' personal lives.
- 8.5 Mental health issues: The transition to work-based learning and balancing work with studies can be stressful, potentially impacting apprentices' mental health.
- 8.6 Discrimination: Apprentices may face discrimination based on protected characteristics outlined in the Equality Act 2010.
- 8.7 Prevent duty concerns: We must be aware of the risk of radicalisation and extremism as part of our Prevent duty obligations.
- 8.8 Financial exploitation: Apprentices may be vulnerable to financial abuse or exploitation, especially if they're managing their own finances for the first time.
- 8.9 Inadequate supervision: There's a risk of insufficient oversight in the workplace or during off-site training sessions.
- 8.10 Safeguarding knowledge gaps: Employers or workplace mentors may lack proper understanding of safeguarding requirements and referral processes.

9 Responding to Disclosure, Suspicions and Allegations

- 9.1 If a learner under the age of 18 or a vulnerable adult, indicates that he or she is being abused, or information given leads to a suspicion of abuse to a person under the age of 18 or a vulnerable adult, action must be taken immediately. The allegation must become an immediate priority and documented at the earliest opportunity

9.2 Actions to take

The person receiving information concerning alleged abuse should:

- React calmly so as not to frighten the person being abused
- emphasise that he/she is acting correctly by reporting the incident or incidents
- take what is said seriously
- keep questions to the absolute minimum to ensure a clear and accurate understanding of what has been said by the young person
- use open ended questions - those that require more than a 'yes' or 'no' response.
- reassure the abused person but do not make promises of confidentiality which might not be feasible in the light of subsequent developments
- make a full record of what has been said, heard and/or seen as soon as possible using the 'Safeguarding Report of Concern' document which is downloadable from the Cheynes Training website.

Please note: the law is very strict and child abuse cases have been dismissed if it appears that the abused person has been led, or words and ideas have been suggested

9.3 Actions to avoid

The person receiving information about alleged abuse must not:

- Panic or allow their shock or distaste to show
- probe for more information than is offered
- speculate or make assumptions
- make negative or positive comments about the alleged abuser or the allegation
- approach the alleged abuser
- make promises, agree to keep secrets or promise confidentiality, adults have a legal obligation to report any alleged abuse
- delay reporting the abuse
- enter into discussion or share the allegation, or make reference to an allegation being reported, with anyone other than the appropriate persons which are the Cheynes Training Safeguarding Lead, the Police or the Social Services department.

9.4 Where a disclosure of abuse has been made, the employee or representative of Cheynes Training must take the action detailed in the following sections.

9.5 Responding to suspicions

It is not the responsibility of an employee or representative of Cheynes Training, or an employer or any member of the employer's team, to decide whether or not abuse is taking place. However, there is a responsibility to protect young persons in order that appropriate agencies can then make enquiries and take any necessary action.

9.6 Actions to take: The person suspecting an abuse should:

- Keep precise notes of events that raise suspicion
- any alleged abuse should be reported to the Cheynes Training Safeguarding Lead without delay using the 'Safeguarding Report of Concern' document.

9.7 Actions to avoid: The person suspecting an abuse must not:

- Make assumptions - it may take time to build up a picture of possible abuse
- make enquiries or probe for information to verify a possible abuse
- make inaccurate records of events.

10 Action on Disclosure or Suspicion of Abuse

10.1 There will always be an opportunity to discuss concerns with the Cheynes Training Safeguarding Lead who will contact the appropriate bodies where appropriate.

- Never delay reporting directly to the Cheynes Training Safeguarding Lead if it is felt a learner under the age of 18 or a vulnerable adult, is at risk of harm
- always make a written record of your concerns as soon as possible
- always make a written record of discussions with the abused person as soon as possible, writing down exactly what the person has said. This should include information on their name, age and any relevant family information, details of the situation, dates, approximate times and the activity that preceded disclosure
- record details and descriptions any physical signs of abuse

10.2 The person informed of possible abuse should remind the person who feels they have been abused that confidentiality cannot be guaranteed in any situation where a person under the age of 18 or a vulnerable adult is at risk of abuse or further abuse. However, reassure them of confidentiality, and explain it will only be disclosed to people who need to know and who can help.

11 Making a Referral

11.1 If someone believes that a young person under the age of 18 or a vulnerable adult, is suffering significant harm, or is at risk of suffering significant harm, then they should immediately refer these concerns to the Cheynes Training Safeguarding Lead who will then report the concerns to either the Social Services department or the Police.

11.2 To understand and establish 'significant harm', it is necessary to consider:

- the nature of the harm, in terms of maltreatment or failure to provide adequate care
- the impact on the young person's health and development
- the young person's development within the context of their employment and learning
- any special needs, such as medical condition, communication impairment or disability that may affect the young person's development and care
- the capacity of parents to adequately support or meet the needs of the young person

11.3 The Cheynes Training Safeguarding Lead has the responsibility to report to the relevant bodies.

11.4 If it is suspected that an abuser is a workplace colleague of the abused person, or an employee or representative of Cheynes Training, which includes employees of an academy partner, the suspected abuser must not be challenged, however, the suspicions should be reported to the Cheynes Training Safeguarding Lead who would then take the appropriate action. The Cheynes Training Safeguarding Lead is required to report any allegations made against those who work in a teaching position with young persons to the Local Safeguarding Authority who will carry out a full investigation.

- 11.5 For purposes of clarity, an employee or representative of Cheynes Training may report a disclosure or suspicion of abuse to the Cheynes Training Safeguarding Lead who will then report the suspicion of abuse to the Local Authority Social Services department, or to the Police. The Safeguarding Lead will take this action irrespective of the opinion of other colleagues including members of the Cheynes Training management team. A referral must never be delayed or prevented from being made.
- 11.6 Full written records must be made of all disclosures, suspicions and actions taken as soon as possible in accordance with 8, above.

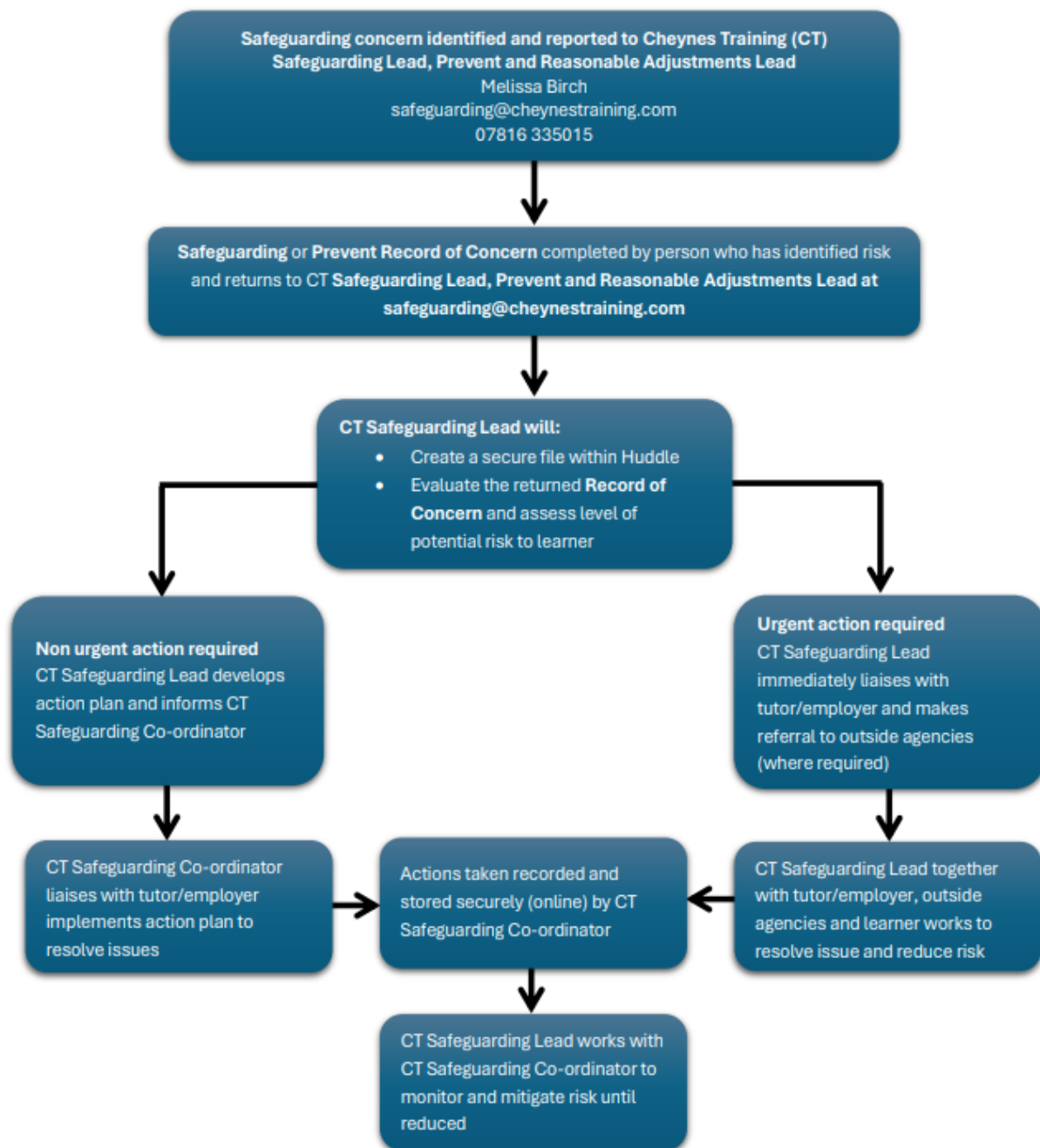
12. Failure to make a referral

- 12.1 Failure to make a referral is an criminal offence. Training providers have a duty to refer individuals in England to the Secretary of State, for possible inclusion on the list of those who are considered unsuitable to work with learners under the age of 18 and vulnerable adults.
- 12.2 An individual who is working with young people, whether paid or unpaid, must be referred to the Secretary of State for inclusion on the list of individuals who are considered unsuitable to work with young people if they have harmed a child or put a child at risk of harm, or have been dismissed or moved away from contact with children as a consequence or would have been dismissed for that reason had they not been made redundant, retired, resigned or come to the end of a fixed term contract.
- 12.3 Anyone whose name is contained within the list of individuals who are considered unsuitable to work with young people, will commit a criminal offence if they apply to or work with learners under the age of 18 or vulnerable adults.



Safeguarding and Prevent Reporting Process Chart for Tutors and Employers

Cheyne Training takes safeguarding seriously and has a comprehensive approach to ensuring the safety and well-being of learners, especially those under the age of 18 and vulnerable adults. The process chart below aims to set out the key reporting processes that underpin Cheynes Training's approach to safeguarding to ensure all learners are better protected and safe from potential risk and harm.



13 Disclosure by an Abuser

- 13.1 Employees or representatives of Cheynes Training may encounter an adult or young person who makes a disclosure about abusing another person under the age of 18 or a vulnerable adult. These situations may be difficult to manage; however, all adults have a duty to protect the abused person involved.
- 13.2 Where there is a disclosure by an abuser, employees or representatives of Cheynes Training should respond in line with sections 9 and 10, above.
- 13.3 Regardless of whether the details of the suspected abuse and the victim are known, a referral should be made to the Cheynes Training Safeguarding Lead.
- 13.4 Should an allegation be made against the Cheynes Training Safeguarding Lead, the referral must go directly to the Executive Chairman, William Howarth, on 0771 034 0048

14 Safe recruitment, selection, induction of employees and representatives

- 14.1 Cheynes Training will take every precaution to ensure unsuitable persons are prevented from working with learners, especially those under the age of 18 and vulnerable adults, who are registered on our programmes. To ensure the safety of learners, any employee of Cheynes Training or a representative of Cheynes Training whose role involves working with learners will go through Enhanced Disclosure and Barring Service (DBS) checks.
- 14.2 We will follow strict procedures to ensure that employees and representatives of Cheynes Training are suitable for any role involving working with learners under the age of 18 and vulnerable adults.
- 14.3 We will work closely with employers to ensure that employees the academy partners we work with are suitable for any role involving working with learners under the age of 18 and vulnerable adults.
- 14.4 Pre-recruitment requirements and information will be made available to all potential new employees and representatives of Cheynes Training and who have applied for a position that involves regular contact with learners under the age of 18 and vulnerable adults. Pre-application information will include a role description including responsibilities and qualifications or experience required along with an application form.
- 14.5 Advertising

Any recruitment advertising used to attract potential employees of Cheynes Training to work with learners, will reflect the:

 - The aims of the programme
 - the responsibilities of the role
 - the level of experience or qualifications required
 - the positive stance on safeguarding held by Cheynes Training
 - that DBS checks will be carried out.

14.6 Applications for a role with Cheynes Training

Applicants who apply for a role with Cheynes Training that involves working with learners under the age of 18 or vulnerable adults must complete an application form which will seek the following information:

- Name, address, national insurance number (to confirm identity and right to work)
- relevant experience, qualifications and training undertaken
- history of career to date (to confirm experience and identify any gaps)
- any criminal record
- whether the applicants are known to be an actual or potential risk to learners under the age of 18 or vulnerable adults
- a Disclosure Declaration to establish whether they have ever had action taken against them in relation to child abuse, sexual offences or violence
- the names of at least two people (not relatives) willing to provide written references that comment on the applicant's previous experience of, and suitability for the role
- the applicant's consent to Disclosure and Barring Service (DBS checks) being undertaken where necessary
- the applicant's consent to abide by the Cheynes Training Safeguarding code of Conduct
- the form will also state that failure to disclose information or subsequent failure to conform to the Safeguarding Code of Conduct may result in disciplinary action.

14.7 Checks and references

Cheyne Training will complete an Enhanced DBS check and will ask the new team member to complete a Safeguarding Disclosure Declaration prior to them working directly with learners under the age of 18 and vulnerable adults.

Until the applicant's Enhanced DBS check has been received and confirmed the person will not interact with learners under the age of 18 and vulnerable adults. Should any criminal offence be recorded in relation to child abuse, sexual offences or violence, the applicant will not be employed.

Applicants who apply for a position with an academy partner (subcontractor) that involves contact with learners under the age of 18 or vulnerable adults will be required to go through the Enhanced DBS check process. A copy of the registration number and date of the Applicant's clearance is held by Cheynes Training. DBS checks must be renewed at appropriate intervals.

For purposes of clarity, DBS checks for employees who deliver teaching on behalf of Cheynes Training to learners employed at the same workplace as the teacher would only be required if the employee is wholly or mainly employed in a teaching, training or assessment role. However, employees who have limited contact with learners under the age of 18 or with others who are vulnerable will be asked to complete Safeguarding Disclosure Declaration which will be held on record by Cheynes Training and renewed on an annual basis or more frequently if required.

Cheyne Training reserves the right to conduct cyber screening on each applicant including checking social media sites, and to request further information in the event of any concerns.

14.8 Interview

All new employees and representatives of Cheynes Training that have direct access to working with learners under the age of 18 and vulnerable adults will be subject to an interview where qualifications are substantiated, and photo identity checked. Any offer of employment will be subject to references and DBS checks. Any shortlisted candidates will be informed that online searches will be carried out.

14.9 Induction and Training

All new employees and representatives of Cheynes Training will undergo a formal induction in which:

- They sign up to the Cheynes Training Safeguarding Code of Conduct
- The expectations, roles and responsibilities of the job are clarified
- Child protection and vulnerable adult welfare procedures are explained

Appropriate safeguarding training will be provided to enable individuals to recognise their responsibilities with regard to their own good practice and the reporting of safeguarding concerns.

15 Confidentiality

- 15.1 Confidentiality is central to the work of Cheynes Training and the attention of all employees and representatives is drawn towards the Cheynes Training Code of Ethics, a copy of which may be found in Appendix 3.

16 Internet Safety

- 16.1 Keeping young people safe has become much more challenging due to the ease in which messaging, social media and websites are accessed and all those involved with delivering teaching, learning and assessment must be constantly alert to the dangers this can pose and the harm that could be inflicted on young people and vulnerable adults.

- 16.2 Cheynes Training has maintained its Cyber Essentials security standard for 2023/24.

17 Photographic policy

- 17.1 The permission of the parent or guardian should be obtained before taking pictures of any person under the age of 18.
- 17.2 All photographs that are taken should be stored securely in accordance with the relevant data protection legislation.
- 17.3 Written permission must be sought from the young person under the age of 18 and their parents or guardian before any photograph is published or put to public use.

18 Mental Health

- 18.1 All staff are aware of poor mental health issues and in some cases that they can be an indicator that the learner under the age of 18 or vulnerable adult has suffered or is subject to abuse, neglect or exploitation.
- 18.2 Cheynes Training recognises that in some cases diagnosed mental health conditions may be considered a disability (as defined under the Equality Act 2010) and reasonable adjustments may be required to learning arrangements.

- 18.3 Cheynes Training staff and academies have access to a range of external agencies to help support the learners under the age of 18 and vulnerable adults. These are available within the website and via contact with the Safeguarding Lead.
- 18.4 Cheynes Training understands that only appropriately trained professionals can diagnose a mental health condition.
- 18.5 Cheynes Training promotes positive health, wellbeing and understand the importance of helping to develop resilience.

19 Local Multi-Agency Support Networks

- 19.1 Cheynes Training will ensure that the Cheynes Training Safeguarding Lead has access to and appropriate links with Local authority safeguarding partnerships and boards and Multi-agency support networks

Monitoring and Evaluating the Policy: we will review this policy prior to the start of each new academic year.

Last review: October 2024

Next Review: October 2025

Melanie Mitchell, managing director
Cheynes Training

Appendix 1

Safeguarding Apprentices and Vulnerable Adults - Code of Conduct

Statement of principles

Our approach is based upon respect for all and an unreserved commitment to safety, fairness and equality of opportunity, especially for learners under the age of 18 and vulnerable adults. We will liaise closely with all organisations we work with to provide a safe and secure environment within which all learners can safely work and learn, and we will make every effort to identify any learner or vulnerable adult who is at risk of suffering harm during their involvement with our programmes and once identified we will take appropriate action to keep them safe.

This Code of Conduct is designed to provide an easy-to-access reference source.

All those involved with Cheynes Training are required to acquaint themselves with our policies and procedures on safeguarding learners and vulnerable adults.

The basic principle of good conduct is that no person involved with a Cheynes Training programme should exploit their role to gain inappropriate access to learners under the age of 18 or to vulnerable adults.

Tutors and others involved with a Cheynes Training programme must therefore practice the following:

- listen and respect everyone as an individual
- value and respect all learners as individuals
- appropriately involve learners in decision making
- encourage and praise achievement
- actively contribute to an organisational culture where inappropriate behaviour is not tolerated
- provide an example of the good conduct you wish others to follow
- ensure that whenever possible there is more than one adult present during activities with learners under the age of 18 and any vulnerable adults, or at least that you are within sight or hearing of others
- avoid transporting individual learners alone by car
- avoid any unnecessary physical contact
- not engage in or allow any sexually provocative activities to take place
- not make or permit suggestive or discriminating remarks to or about learners under the age of 18 or vulnerable adults
- not meet learners under the age of 18 or vulnerable adults - outside of organised or formal interaction
- do not give out personal information, or share personal email addresses, mobile phone numbers etc. with any learner under the age of 18 or vulnerable adults
- do not accept learners as friends on any social media site
- keep all communication with apprentices and employers professional. Do not include kisses ("x") in communication with learners and employers
- report all allegations or suspicions of abuse by seeking further support and guidance, including any allegation made against yourself or others
- ensure that any concerns about inappropriate behaviour are quickly and appropriately reported to either your manager, your employer, the Regional Training Advisor or the Cheynes training Safeguarding Officer
- positively support a reporting culture where any concerns about inappropriate behaviour by others towards young people and vulnerable adults is speedily reported to your manager, your employer, the Regional Training Advisor or Cheynes Training Safeguarding Officer.

Notes relating to the Safeguarding Code of Conduct:

- Photographs or videos, including those obtained by a camera phone, must not include any learner unless authorised by the individual concerned. Where the learner is under the age of 18, parental consent must be obtained.
 - All those who come into contact with young people should be aware that some under the age of 18, or vulnerable adults, may behave inappropriately.
 - Sexual relationships between the employees and representatives of Cheynes Training and learners are strictly forbidden.
 - Due to the nature of the role and for the purposes of the Rehabilitation of Offenders Act Exceptions Order 1975, please provide details of any criminal convictions, cautions etc., and the penalty or penalties imposed, whether regarded as spent under the Rehabilitation of Offenders Act 1974.
 - Please also include details of any criminal proceedings or investigations currently being undertaken, which involve you.
 - Cheynes Training reserves the right to request that any person involved in a Cheynes Training programme undertakes a Disclosure and Barring Service (DBS) check.
 - Any information gathered for the purposes of safeguarding learners under the age of 18 or vulnerable adults - will be treated in confidence.
 - The information received around disclosures will, unless there are exceptional circumstances, be securely destroyed after a period of six months.
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Appendix 2

Cheynes Training – Safeguarding Disclosure Declaration Form

All those involved with the programmes delivered by Cheynes Training are required to read and understand the Cheynes Training policies and procedures for Safeguarding Children, Young People and Vulnerable Adults, and to agree to abide by our Statement of Principles.

You are therefore asked to sign this Disclosure Declaration and return a copy to Cheynes Training to help Cheynes Training undertake a safeguarding risk assessment.

I confirm that I have read and understood the Cheynes Training Safeguarding Children, Young People and Vulnerable Adults Policy and Code of Conduct, and due to the nature of my role and for the purposes of the Rehabilitation of Offenders Act Exceptions Order, 1975, I am willing to provide details of any criminal convictions and the penalty imposed, whether or not regarded as spent under the Rehabilitation of Offenders Act 1974.

Self-declaration

I declare that the information I have given on this form is true to the best of my knowledge and belief. I understand that my application for involvement with the Cheynes Training programmes may be rejected or that I may be subject to disciplinary action for withholding relevant details or giving false information.

- ☐ **I have nothing to disclose**
- ☐ **I have a conviction/caution**
- ☐ **I am currently under investigation or criminal proceedings are pending**
- ☐ **I agree to abide by the requirements of the Code of Conduct**

Name: _____

Salon: _____

Signed: _____

Dated: _____

Please provide details of unspent and spent criminal convictions including the type of offence, the date of the conviction and the sentence passed.

Please return in an envelope clearly marked confidential to Tricia Barnes, DBS Officer, Cheynes Training, 16 Rutland Square Edinburgh, EH1 2BB. We confirm that any information you provide will only be viewed by those who need to see it as part of our safeguarding process.

Appendix 3

Keeping Children Safe in Education (KCSIE)

The Department for Education (DfE) produces updated guidance annually that comes into force in September each year (latest advice published 2nd September 2024). The following notes explain the Cheynes Training response and our plans to introduce the updated guidance across our training programmes:

- **Whole provision approach to safeguarding:** We believe that our policy is very clear about the need for everyone involved with our training programmes to share our approach to safeguarding by strictly following our Safeguarding Policy and the associated procedures. Please refer to section 1 of our Safeguarding Policy
- **Safeguarding and child protection policies:** This covers peer-on-peer abuse, reporting systems, procedures, multi-agency safeguarding arrangements and serious violence. We have further strengthened our policy in respect of peer-on-peer abuse and serious violence, please refer to section 4 and section 7 of our Safeguarding Policy.
- **Supporting Victims of Abuse:** This covers the support offered to victims of abuse and ensuring young people do not feel ashamed or feel they are creating a problem by reporting abuse. We believe that very good levels of support exist throughout Cheynes Training. We provide detailed information about the support that is available to young people and our policy contains references to the different types of support available.
- **Online safety:** Following the updated guidance, we have reviewed and updated our approach to online safety and added a new section in our Safeguarding Policy, please refer to section 16.
- **Child criminal and sexual exploitation:** We believe our existing provisions fully cover the additional requirements under KCSIE.
- **Mental health support:** Cheynes Training has responded positively to the requirement for a greater focus in this area and has introduced a new section on mental health, please see section 18.
- **Peer-on-peer abuse:** Following the updated guidance, we have reviewed and updated our section on peer-on-peer abuse, please refer to section 7.
- **Serious violence:** We believe our existing provisions fully cover the additional requirements under KCSIE 2022
- **Social care assessments:** Cheynes Training has systems and procedures in place that provides information for learners who are at high risk and require additional support through the social care system.
- **Record keeping:** We believe our current system of record keeping meets all requirements under KCSIE 2022.
- **Recruitment:** Cheynes Training has systems and procedures in place to ensure safe recruitment and we have updated section 14 in the light of the advice in KCSIE 2023.
- **Filtering and Monitoring:** Following the KCSIE 2023 update, we updated the Safeguarding Lead's responsibilities set out in section 5 and our internet safety section 16.