

Safeguarding Policy

This policy applies to all Keyturn Training Limited staff, including senior managers and board of directors, agency staff, consultants working on behalf of Keyturn Training Limited and students.

This purpose of this policy is to:

- Protect young and vulnerable people who receive Keyturn Training Limited's services.
- Provide staff and consultants with the overarching principles that guide our approach of safeguarding and child protection.

Keyturn Training Limited believes that a young or vulnerable person should never experience abuse of any kind. We have a responsibility to promote the welfare of all young and vulnerable people and to keep them safe. We are committed to practise in a way that protects them.

Keyturn Training is committed to the implementation of this policy and to the programme of action to ensure that the policy is, and continues to be, fully effective. The overall responsibility for the policy lies with the Chief Executive. However, all staff are required to comply with the policy and to act in accordance with its objectives any failure to comply with the terms of this policy will result in disciplinary action.

Keyturn Training only work with learners over the age of 18, but still adhere to this policy to protect vulnerable people. Keyturn Staff are not DBS checked as we do not work with anyone under the age of 18, employers will be made aware of this prior to running our apprenticeships/training. Keyturn are monitoring this and should the policy change and training is delivered to under 18 year olds, DBS checks will be provided to the relevant staff and the Safeguarding will be updated accordingly.

Legal Framework

This policy has been drawn up on the basis of law and guidance that seeks to protect young and vulnerable people, namely:

- Children Act 1989
- United Convention of the Rights of the Child 1991
- Education and Training (Welfare of Children) Act 2021
- Data Protection Act 1998
- Human Rights Act 1998
- Sexual Offences Act 2003
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Protection of Freedoms Act 2012
- Children and Families Act 2014
- Special educational needs and disability (SEND) code of practice: 0 to 25 years - Statutory guidance for organisations which work with and support children and young people who have special educational needs or disabilities; HM Government 2014
- Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers: HM Government 2015
- Working together to safeguarding children: a guide to inter-agency working to safeguard and promote the welfare of children; HM Government 2015

This document should be read alongside our policies and procedures on:

- QP002-Quality Policy Overview

- QP001-Quality Manual
- EH001-Employee Handbook
- TH001-Trainers Handbook
- QP004-Internal Quality Assurance Strategy
- EDP001-Equality and Diversity Policy
- DP001-Data Protection Policy
- CP001-Complaints Policy
- AP001-Assessment Policy
- ILM0001-Candidate Handbook
- SG002-E-Safety Policy
- SG003-Anti-bullying Policy

We recognise that:

- the welfare of the young or vulnerable person is paramount, as enshrined in the Children Act 1989
- all young people, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have a right to equal protection from all types of harm or abuse
- some young people are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues
- working in partnership with young people we are training and their employers and other agencies is essential in promoting young people's welfare

We will seek to keep children, young people and adults safe by:

- valuing them, listening to and respecting them
- appointing a Designated Safeguarding Officer (DSO) for children, young people and vulnerable adults, this role lies with the Managing Director, who will be the lead board member for safeguarding
- adopting child protection and safeguarding practices through procedures and code of conduct for staff and contractors
- developing an effective e-safety policy and related procedures
- providing effective management for staff and contractors through supervision, support, training and quality assurance measures
- recruiting staff and consultants safely, ensuring all necessary checks are made if the member of staff is working directly with children
- recording and storing information professionally and securely, and sharing information about safeguarding and good practice with young people and their employers who are putting them on the training programme Keyturn are running
- using our safeguarding procedures to share concerns and relevant information with the young person's employer and relevant agencies where appropriate
- using our procedures to manage any allegations against staff and contractors appropriately
- creating and maintaining an anti-bullying environment ensuring we have policy and procedure to help us deal effectively with any bullying that does arise
- ensuring that we have effective complaints and whistleblowing measures in place
- ensuring that a safe physical environment for the young and vulnerable people, staff and contractors is provided in consultation with the customer
- ensure that all data held on an apprentice/learner is only kept for use for the training and only the relevant information is kept securely as per our GDPR policy (www.keyturn.co.uk/policies)
- ensuring apprentices feel safe using online services and be able to report any concerns, this includes:
 - be aware of employers safeguarding policy and their IT security with regards to blocking harmful websites

- discuss use of IT at the regular assessor reviews as part of safeguarding
- apprentices are made aware at induction of safeguarding online and the areas in 'Prevent' and potential areas for concern

Reporting Concerns

Keyturn expect all employees and training team to report improper actions and omissions. Whilst all malpractice and acts of discrimination will be investigated, it is especially important that suspicions of abuse or inappropriate behaviour that causes concern are immediately reported to the Safeguarding Co-ordinator.

Contact Details:

Designated Safeguarding Officer (DSO) & Safeguarding trained

Name: Nicola Seymour

Email: nicola.seymour@keyturn.co.uk

Deputy DSO & Safeguarding trained

Name: Cheryl Shepherd

Email: Cheryl.shepherd@keyturn.co.uk

Detailed procedures where there is a concern that an adult is in need of protection: SUSPICIONS OR ALLEGATIONS OF ABUSE or HARM

Including physical, sexual, organisational, financial, discriminatory, neglect, self-neglect, forced marriage, modern slavery, domestic abuse. *Examples of these can be found at the end of this policy, under definitions.*

If there is a concern about any of the above the Safeguarding Co-ordinator/Deputy will:

- Contact the Adult Social Care Team 01926 412080 who have responsibility under the Care Act 2014 to investigate allegations of abuse. Alternatively contact CCPAS for advice.
- If the adult is in immediate danger or has sustained a serious injury contact the Emergency Services, informing them of any suspicions.

ALLEGATIONS OF ABUSE AGAINST A PERSON WHO WORKS WITH CHILDREN/YOUNG PEOPLE

If an accusation is made against a worker, whether a volunteer or paid member of staff, the Safeguarding Co-ordinator will make a referral to a Local Authority Designated Office.

Procedures are described on <https://www.safeguardingwarwickshire.co.uk/>

“Concerns about a person in a Position of Trust: Where there are concerns relating to a person in a Position of Trust (POT) this should be referred to the Local Authority Designated Officer (LADO).

LADO: 01926 743433 lado@warwickshire.gcsx.gov.uk

Position of Trust MARF (DOCX, 1.53 MB)

<http://apps.warwickshire.gov.uk/api/documents/WCCC-1167-4>

Reference: Working Together to Safeguard Children 2015. Consideration should be given to whether

a referral should be made to the Disclosure and Barring Service which manages the list of those people deemed unsuitable for working with children or vulnerable adults. A discussion with the designated officer will clarify the need to refer.

ALLEGATIONS OF ABUSE AGAINST A PERSON WHO WORKS WITH ADULTS WITH CARE AND SUPPORT NEEDS

The Care Act places the duty upon Adult Services to investigate situations of harm to adults with care and support needs. This may result in a range of options including actions against the person or organisation causing the harm, increasing the support for carers or no further action if the 'victim' chooses for no further action and they have the capacity to communicate their decision. This is a decision for Adult services and not the organisation.

Safeguarding awareness and training

Keyturn is committed to on-going safeguarding training and development opportunities for all workers, developing a culture of awareness of safeguarding issues to help protect everyone. All staff receive induction training. Further details on our training and promotional of the policy can be found below in the 'Promoting the Policy' section.

Keyturn will also ensure that children and adults with care and support needs are provided with information on where to get help and advice in relation to abuse, discrimination, bullying or any other matter where they have a concern.

Management of Workers - Codes of Conduct

Keyturn are committed to supporting all workers and ensuring they receive support and supervision. All staff have been given a copy of this policy and is also available on the website.

Keyturn undertakes to follow the principles found within the 'Abuse of Trust Caring for young people and the vulnerable: Guidance for preventing abuse of trust' issued by the Home Office.

This guidance applies to those caring for young people or adults at risk of harm or abuse in both paid and unpaid work, including volunteers, regardless of whether they are in the public, private, voluntary or volunteering sectors.

It is therefore unacceptable for those in a position of trust to engage in any behaviour which might allow a sexual relationship to develop for as long as the relationship of trust continues. Each group will regularly monitor procedures so that clear boundaries with regard to the development of personal relationships are maintained with the established practice guidelines.

Promoting the Policy:

This policy is promoted through the following:

- Website: the policy is available to view on the Keyturn website - www.keyturn.co.uk/policies/
- Apprentice/Learner Handbook: the link to this policy is referenced in the handbook that is given to each apprentice/learner at the beginning of their training session
- Apprentice/Learner Induction: all learners who attend an apprenticeship or ILM programme are given details of this policy to familiarise themselves with Safeguarding and Prevent issues and the Keyturn procedure. As part of the apprenticeship induction apprentices are given some online training on Safe Guarding and Prevent to help develop understanding
- Apprentice Reviews: Each month the apprentice has a review meeting with their assessor, as part of this review the apprentice has an opportunity to feedback to the assessor any issues they may be having with regards to Safeguarding and Prevent in the workplace and within their apprenticeship training programme.
- Staff Induction: This policy forms part of the induction process for any new staff or training team.
- Employee Handbook: the employee handbook is given to new employees to read through prior to starting their role. They are then asked to sign to confirm they have read and understood the policy
- Trainer Handbook: the trainer handbook is given to new trainers to read through prior to starting their role. They are then asked to sign to confirm they have read and understood the policy
- Staff Training - for new staff or trainers, in addition to the induction process, Keyturn also

offer training using our Videotile training programme - <https://keyturn.co.uk/business-skills-online-training/>

- Keeping updated – any updates to this policy is communicated to the Keyturn team in our staff meetings and annual company wide meeting

Promoting the Policy:

In this safeguarding policy, the following terms and definitions are provided to ensure a common understanding among all staff, volunteers, and stakeholders involved in safeguarding vulnerable individuals. These definitions are intended to encompass a broad range of circumstances and behaviours, with the primary goal of protecting those at risk of harm.

Vulnerable Individual:

A vulnerable individual is someone who, due to their age, physical or mental health, disability, or other factors, is at risk of being physically, emotionally, sexually, or financially abused, neglected, discriminated against, or otherwise harmed.

Physical Abuse:

Physical abuse refers to any intentional use of force that causes bodily harm, injury, or pain to a vulnerable individual. This includes hitting, slapping, pushing, or any other form of physical harm.

Sexual Abuse:

Sexual abuse involves any non-consensual sexual activity, exploitation, or harassment of a vulnerable individual. This includes sexual assault, indecent exposure, or any sexual conduct without explicit and informed consent.

Organisational Abuse:

Organisational abuse refers to situations where an institution or its representatives neglect their duty of care towards vulnerable individuals, resulting in harm, deprivation, or exploitation. This can include inadequate staffing, poor supervision, or restrictive practices that harm individuals' well-being.

Financial Abuse:

Financial abuse is the unauthorized or improper use of a vulnerable individual's money, property, or assets for personal gain. This can include theft, fraud, coercion, or undue influence.

Discriminatory Abuse:

Discriminatory abuse occurs when a vulnerable individual is treated unfairly or subjected to prejudice or discrimination based on their age, gender, race, religion, disability, sexual orientation, or other protected characteristics.

Neglect:

Neglect is the failure to provide adequate care, attention, or support to a vulnerable individual's basic physical, emotional, or medical needs, resulting in harm or deterioration of their well-being.

Self-Neglect:

Self-neglect refers to situations where a vulnerable individual neglects their own basic needs, putting themselves at risk of harm due to their inability or unwillingness to care for themselves adequately.

Forced Marriage:

Forced marriage is a marriage in which one or both parties do not give their free and informed consent, often involving coercion, threats, or emotional pressure.

Modern Slavery:

Modern slavery encompasses various forms of exploitation, such as human trafficking, forced labour, debt bondage, or servitude, in which individuals are held against their will and subjected to degrading conditions.

Domestic Abuse:

Domestic abuse involves patterns of controlling, coercive, or violent behaviour within an intimate or family relationship, causing physical, emotional, or psychological harm.

These definitions serve as a foundation for understanding and identifying safeguarding concerns and are integral to our commitment to preventing harm and ensuring the safety and well-being of vulnerable individuals under our care. It is essential that all staff, volunteers, and stakeholders are familiar with these definitions and remain vigilant in recognizing and reporting any safeguarding issues promptly.

Updates/Reviews		
18 June 2018	Creation of document - formed from previous PDR and assessment documents	CJS
20 June 2019	Addition of additional procedures for adult abuse, safeguarding awareness and training and codes of conduct	CJS
24 April 2021	Reviewed	CJS
2 September 2022	Reviewed - change Nicola to lead Safeguarding officer, added section on definitions at the end of the policy	CJS
September 2023	Next review	

Signed:



Date: 02/09/2022