



NiNe Training Limited

Safeguarding Policy and Procedure 2025-2026

Document version control

Document title:	NINE Safeguarding Policy and Procedure
Document status:	Final
Version number:	3
Date:	14/07/2025
Author:	Directors
Approved by:	ND/ENH
Review date:	May 2026



Table of Contents

Purpose	3
Scope	4
Definitions	4
Definition of a child (including young people).....	5
Definition of a child at risk	5
Definition of Harm	5
Definition of an Adult at Risk - over the age of 18	5
Regulated Activity	5
Legal and Regulatory Framework	6
Implementation	6
Responsibilities	8
The Directors:	8
The Directors/Head of Operations:	8
Head of Operations	8
Staff:.....	8
Learners:	8
Reporting Safeguarding Concerns and NiNe Safeguarding Contact Details.....	9
Recording and Tracking.....	10
Confidentiality	10
Principles of Information Sharing.....	11
Principles.....	12
GDPR & Data Protection	13
Difficult Issues	14
Impact on the Learner	14
Communication.....	14
Monitoring and Review Processes	15
Complaints.....	15
Useful Contacts.....	16
Wales Safeguarding Boards & Local Authority Contact Information	16
Prevent / Radicalisation Concerns.....	17
Appendix 1	18
Smart Assessor Safeguarding Referral Process [Apprentices]	18
1. Purpose	18
2. Application	18
3. Procedure	18
Appendix 2	19
Safeguarding Referral Process [Other].....	19



Purpose

NiNe Training Limited is committed to safeguarding and promoting the welfare of all learners, particularly those under the age of 18 and adults at risk. Safeguarding is everyone's responsibility. All staff and subcontracted staff are expected to act promptly where there are concerns about a learner's safety or wellbeing.

All vulnerable groups, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have the right to equal protection from all types of harm or abuse. Working in partnership with vulnerable groups, along with external agencies and partners is essential in safeguarding the welfare of learners.

This policy defines the way the organisation will meet its duty of care in safeguarding and preventing harm to learners. The welfare of children, young people and adults at risk is paramount in all the work we do and in all the decisions we take.

This policy applies to all NiNe staff and subcontracted staff working in training venues, employer premises, community settings and school environments.

NiNe believes that everyone deserves the opportunity to achieve their full potential. They should be enabled to:

- Enjoy the best possible health free from abuse, victimisation, and exploitation.
- Fully benefit from a comprehensive range of quality education and learning opportunities.
- Learn in a safe environment and be protected from harm.
- Feel valued and supported by a network of reliable relationships.
- Become competent in looking after themselves and coping with everyday living.
- Have a positive image of themselves and a secure sense of identity, including cultural and racial identity.
- Develop good interpersonal skills and confidence in social situations.
- Not be disadvantaged by poverty.

This policy must be read in conjunction with NiNe's:

- Prevent Policy
- Equality, Diversity & Inclusion Policy, and Procedure
- Health and Safety Policy and Procedure
- Complaints Policy and Procedure
- Whistleblowing Policy and Procedure
- Teaching, Learning & Assessment Strategies



- Anti-bullying and Harassment Policy
- NiNe Data Protection Policy

Scope

This policy covers all of the organisational activities of NiNe Training Limited. This policy applies to all managers, staff, learners, employers, and associates of NiNe whilst indirectly providing direction and awareness to the wider community and partner organisations. Through the development and implementation of this policy, the directors can be assured that the organisation is adhering to the organisation's commitment to safeguarding children, young people, and adults at risk.

Definitions

Safeguarding is defined as:

Preventing and protecting children, young people, and adults at risk from experiencing abuse or neglect and educating those around them to recognise the signs and dangers.

Safeguarding is the action that is taken to promote the welfare of children, young people and adults at risk and protect them from harm. Safeguarding means: protecting children, young people, and adults at risk from abuse and maltreatment. preventing harm to children, young people, or adults at risk; Ensuring children, young people and adults at risk grow up and thrive with the provision of safe and effective care.

NiNe recognises that safeguarding is not just about protecting children, young people and adults at risk from deliberate harm. It includes issues such as:

- Health and safety
- Bullying
- Racial abuse
- Physical/Emotional/Sexual/Financial/Abuse
- Neglect
- Harassment and discrimination
- Drug and substance misuse
- Internet safety
- Issues which may be specific to a local area or population
- Security of the learning environment
- Developing appropriate attitudes towards personal safety and well-being
- Cyber-bullying and harassment
- Fulfilment of the Prevent Duties and promotion of British Values



Definition of a child (including young people)

An individual under the age of 18 years.

Definition of a child at risk

The Social Services and Well-being (Wales) Act 2014 defines a child at risk as a child who: Is experiencing or is at risk of abuse, neglect or other kinds of harm; Has needs for care and support (whether or not the authority is meeting any of those needs).

Definition of Harm

- Ill treatment this includes sexual abuse, neglect, emotional abuse, and psychological abuse.
- The impairment of physical or mental health (including that suffered from seeing or hearing another person suffer ill treatment).
- The impairment of physical, intellectual, emotional, social, or behavioural development (including that suffered from seeing or hearing another person suffer ill treatment).

Definition of an Adult at Risk - over the age of 18

The Social Services and Well-being (Wales) Act defines an 'adult at risk' as someone who is:

- Experiencing or is at risk of abuse or neglect
- Needs care and support (whether or not the authority is meeting any of those needs)
- As a result of these needs is unable to protect themselves against abuse, neglect or the risk of either

Regulated Activity

Work that involves regular contact with children or adults at risk as defined by relevant safeguarding legislation.



Legal and Regulatory Framework

NiNe will comply fully with all related legislation which will include, but not be limited to:

- The Wales Safeguarding Procedures (Safeguarding Wales)
- Keeping Learners Safe, 2022
- The Well-being of Future Generations (Wales) Act, 2015
- The Social Services and Well-being (Wales) Act, 2014
- The Equality Act 2010
- Additional Learning Needs and Educational Tribunal (Wales) Act 2018
- ALN Code for Wales, 2021
- The Children Act, 1989
- The Children Act, 2004
- Violence against Women, Domestic Abuse and Sexual Violence (Wales) Act, 2015
- Mental Capacity Act, 2005
- The Police Act, 1997
- Rights of Children and Young Persons (Wales) Measure, 2011
- United Nations Convention on the Rights of the Child
- Data Protection Act, 2018
- UK GDPR and Data Protection Act, 2018
- Sexual Offences Act, 2003
- Rehabilitation of Offenders Act, 1974

Implementation

NiNe recognises that safeguarding risks such as people trafficking, female genital mutilation (FGM), county lines, drug trafficking and modern-day slavery etc, may vary according to variables such as locations, seasons, etc.

NiNe recognises its responsibility to keep abreast of local priorities through sources such as statutory agencies, local authorities and broadcast media as well as through more informal channels such as social media, learners, employers, community forums.

To **fulfil** its commitment to safeguarding, and to ensure appropriate action is taken, NiNe has adopted principle approaches to Safeguarding, following guidance from the All Wales Safeguarding Procedures.

To meet the requirements of this model, NINE will:

- Value, listen to and respect the individual.
- Be proactive in the promotion and education of safeguarding issues to staff and learners to prevent safeguarding issues arising as far as reasonably practicable.
- Ensure all staff receive information on safeguarding issues, the safeguarding strategy and procedures.



- Ensure that all designated safeguarding personnel receive appropriate training and refresher training.
- Treat all concerns and allegations of abuse seriously and respond appropriately with learners being fully supported and informed.
- Ensure that principles of safer recruitment are adhered to i.e. enhanced DBS checks and verifying original DBS certificates.
- Ensure that all procedures and reporting systems are maintained.
- Ensure that where appropriate, external referrals are undertaken in a timely manner.
- Recording, storing, and using information professionally and securely, in line with data protection legislation and guidance.
- Use our procedure to manage any allegations against staff, volunteers and it's sub- contractors appropriately.
- Create and maintain an anti-bullying environment and ensuring that we have a policy and procedure to help us deal effectively with any bullying that does arise.
- Building a safeguarding culture where staff, volunteers, children, young people, their families, and adults, treat each other with respect and are comfortable about sharing concerns.
- Ensure appropriate Enhanced DBS checks are in place for staff engaged in regulated activity.
- Ensure safeguarding arrangements are aligned with partner schools and employer safeguarding procedures where applicable.

NiNe will ensure that safeguarding information and training is communicated at all appropriate opportunities and the relevant records maintained for reference and audit. Staff will ensure that effective communication is achieved with learners, stakeholders, and the wider community.

NiNe adopts an approach to Safeguarding following the principles of the All Wales Safeguarding Framework, including person-centred practice and rights-based approach: [Safeguarding Wales](#)

The safeguarding status of all learners is assessed at programme enrolment. At each visit, the safeguarding status of the learner is reviewed against the safeguarding system.



Responsibilities

The Directors:

- Have overall responsibility for safeguarding governance within the organisation.

The Directors/Head of Operations:

- Ensuring that the safeguarding policy and procedures are fully embedded within the activities of the organisation
- Ensuring that the implementation of the safeguarding policy and its associated procedures is reviewed to ensure that it remains effective
- Ensuring that the safeguarding policy and procedures are effectively communicated to staff and learners
- Providing both strategic and operational support to all staff
- Ensuring that a Safeguarding Officer are appointed and that these appointments are clearly communicated to staff and learners
- Monitoring and evaluating the implementation of all safeguarding related procedures and practices
- Ensuring consistent behaviours and standards across all staff
- Ensuring compliance with legislation relating to vulnerable groups and maintaining the required levels of governance

Head of Operations

- Receiving and recording safeguarding concerns
- Making referrals to external agencies where required
- Liaising with partner schools or employers
- Ensuring safeguarding training is up to date
- Maintaining confidential safeguarding records within restricted SharePoint access

Note: Where a safeguarding concern relates to the Safeguarding Officer, the concern must be reported directly to a Director.

Staff:

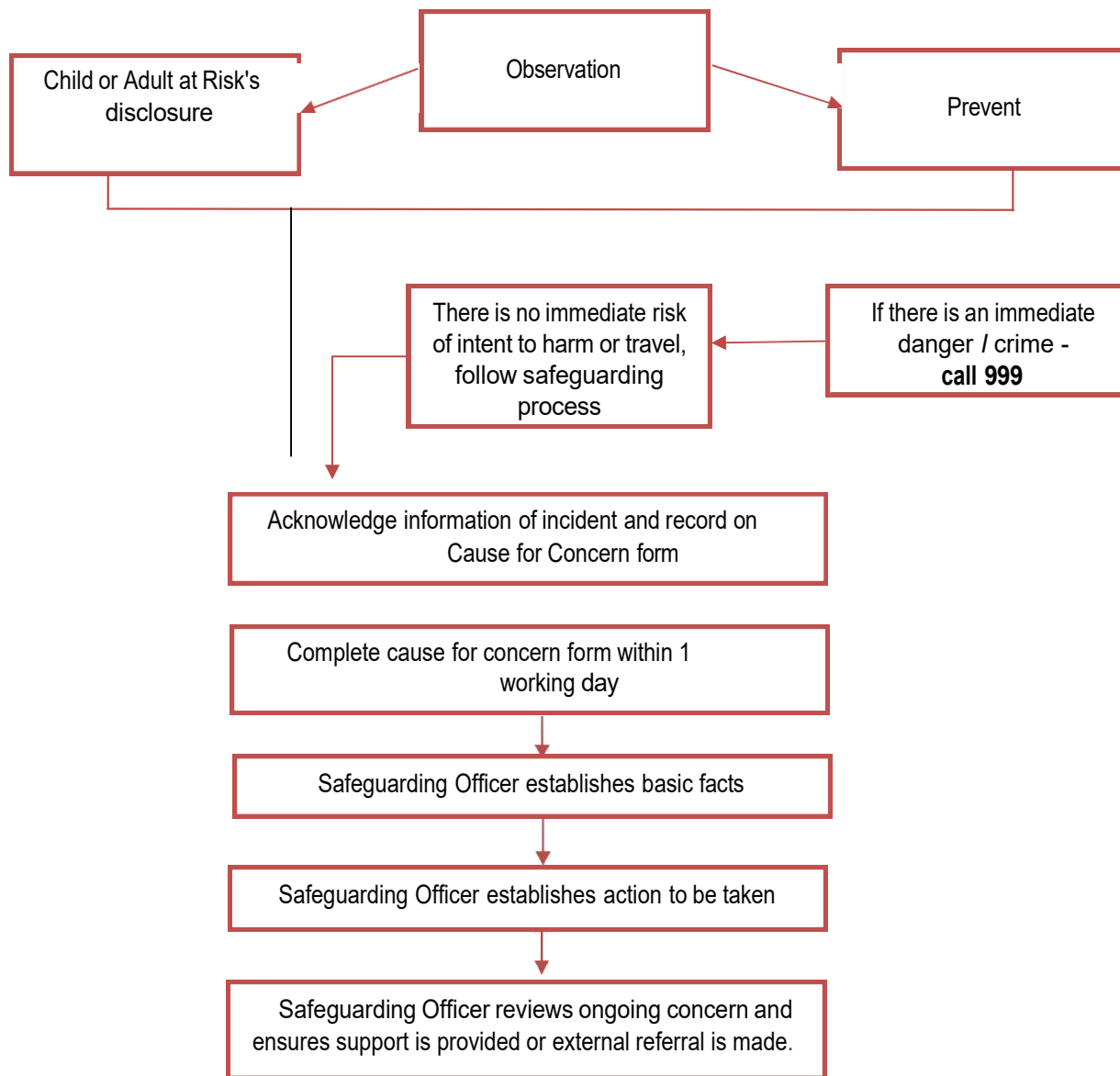
- Ensuring that they are aware of this policy and know how to follow the correct monitoring and reporting procedures.
- Ensuring that any safeguarding concerns are raised promptly and in line with safeguarding procedures.
- Where concerns are felt to have not been appropriately addressed, staff have the responsibility to raise concerns directly with the NiNe Training Limited director(s).

Learners:

- Raising any safeguarding concerns with their Assessor or any member of staff in NiNe Training, as appropriate.



Reporting Safeguarding Concerns and NiNe Safeguarding Contact Details



NiNe Training Limited Safeguarding contact details	Head of Operations	Charlotte Reed	charlier@nine-traininglimited.com
		07538 612410	info@nine-traininglimited.com

Where safeguarding concerns arise in school settings, NiNe staff will follow the host school's safeguarding reporting procedures in addition to notifying the Head of Operations.



Recording and Tracking

In order to ensure that all safeguarding concerns are effectively monitored, reported and referred as appropriate, NiNe have a confidential monitoring and reporting system in place.

Where a Cause for Concern is submitted via Smart Assessor, the designated Safeguarding Lead at the primary provider will review and update the Directors as required. Where a Cause for Concern form is submitted using the document in Appendix 2, the Head of Operations will review and store all records securely within the restricted-access safeguarding area of the NiNe SharePoint system.

The Head of Operations will advise, monitor and review all reported safeguarding issues to ensure that such concerns are addressed appropriately to ensure a positive learner outcome.

Confidentiality

NiNe takes the issues of safeguarding and confidentiality very seriously. Data protection and confidentiality of information about or disclosed by learners has been considered in all of NiNe safeguarding procedures.

The SharePoint system used to record learner safeguarding status is password protected and on only authorised staff have access to this system.

All cause for concern forms is securely held with access restricted to Safeguarding Officer and the person who initial raised the concern.

The central NiNe Safeguarding Tracker includes only the Learner Reference Number. These trackers are also password protected with only those with direct responsibility for safeguarding having access.

All learners will be advised that where a learner is deemed to be at substantial risk, the member of staff has a duty of care to act on disclosures or observations made. Consent from the learner will be sought where possible, but the safety of the learner takes priority and information may be provided to external agencies if needed. This will only be done, under the guidance of the NiNe Safeguarding Officer.



Principles of Information Sharing

There are key principles to sharing information which allow those working with children, young people and adults at risk to make sound decisions regards sharing information.

The Social Services and Well-being (Wales) Act 2014 states the following rules to sharing information:

- (1) Remember that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing but provide a framework to ensure that personal information about living individuals is shared appropriately.
- (2) Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
- (3) The GDPR gives people the right to be informed, which means they need to be made aware of how their data is being used. However, under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.
- (4) Seek advice from other practitioners, or your safeguarding lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
- (5) Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
- (6) Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up to date, is shared in a timely fashion, and is shared securely (see Principles).
- (7) Keep a record of your decision and the reasons for it - whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.



Principles

Practitioners should use their judgement when making decisions about what information to share and should follow organisation procedures. The most important consideration is whether sharing information is likely to support the safeguarding and protection of a child.

There are several principles that can assist practitioners in making decisions about sharing information:

Necessary and proportionate - When taking decisions about what information to share, you should consider how much information you need to release. Not sharing more data than is necessary to be of use is a key element of the GDPR and Data Protection Act 2018, and you should consider the impact of disclosing information on the information subject and any third parties. Information must be proportionate to the need and level of risk.

Relevant - Only information that is relevant to the purposes should be shared with those who need it. This allows others to do their job effectively and make informed decisions.

Adequate - Information should be adequate for its purpose. Information should be of the right quality to ensure that it can be understood and relied upon.

Accurate - Information should be accurate and up to date and should clearly distinguish between fact and opinion. If the information is historical then this should be explained.

Timely - Information should be shared in a timely fashion to reduce the risk of missed opportunities to offer support and protection to a child. Timeliness is key in emergency situations, and it may not be appropriate to seek consent for information sharing if it could cause delays and therefore place a child or young people at increased risk of harm. Practitioners should ensure that sufficient information is shared, as well as consider the urgency with which to share it.

Secure - Wherever possible, information should be shared in an appropriate, secure way. Practitioners must always follow their organisation's policy on security for handling personal information.



Record - Information sharing decisions should be recorded, whether the decision is taken to share. If the decision is to share, reasons should be cited including what information has been shared and with whom, in line with organisational procedures. If the decision is not to share, it is good practice to record the reasons for this decision and discuss them with the requester. In line with each organisation's own retention policy, the information should not be kept any longer than is necessary. In some rare circumstances, this may be indefinitely, but if this is the case, there should be a review process scheduled at regular intervals to ensure data is not retained where it is unnecessary to do so.

Staff who raise safeguarding concerns in good faith will be protected from detriment in accordance with the Whistleblowing Policy.

GDPR & Data Protection

To effectively share information:

- all practitioners should be confident of the processing conditions, which allow them to store, and share, the information that they need to carry out their safeguarding role. Information which is relevant to safeguarding will often be data which is considered 'special category personal data' meaning it is sensitive and personal.
- where practitioners need to share special category personal data, they should be aware that the Data Protection Act 2018 includes 'safeguarding of children and individuals at risk' as a condition that allows practitioners to share information without consent.
- information can be shared legally without consent, if a practitioner is unable to, cannot be reasonably expected to gain consent from the individual, or if to gain consent could place a child at risk.
- relevant personal information can be shared lawfully if it is to keep a child or individual at risk safe from neglect or physical, emotional, or mental harm, or if it is protecting their physical, mental, or emotional well-being.

It is also important that:

- Fears about sharing information should not be a barrier to safeguarding and promoting the well-being of children at risk of abuse or neglect.
- Every practitioner must take responsibility for sharing the information they hold and cannot assume that someone else will pass on information, which may be critical to keeping a child safe.
- Practitioners must understand how to work in collaboration with other agencies to share information in a proportionate and timely way to prevent harm.



Difficult Issues

Those working with children, young people or adults at risk understand that they have a duty to share information when they or others have evidence that someone is being or is at risk of being abused or neglected. The more difficult situations are where: -

There is little or no clear evidence, but you may have a worry that the child or adult at risk may be at risk of abuse or neglect.

Or

The concern is not about abuse or neglect, but about other aspects of the child or adult's at-risk welfare or well-being, such as a health issue, their attendance and performance at work or in their placement, or that they may become involved in criminal behaviour.

There have been many cases in the media where failure to report even seemingly minor concerns have led to serious consequences for the welfare of a child, adult at risk, or for others. In the relatively short amount of time, you may spend with a learner, it is unlikely that you will see the full picture. Sometimes it is not until information is shared and understood, that a clearer picture emerges, which may confirm or allay concerns about a child or adult's at-risk safety and welfare. Cases such as Peter Connelly and David Pelka or the widespread issues which emerged from Winterbourne View care home are extreme examples of cases where serious issues have not been identified at an early opportunity.

Impact on the Learner

The implementation of this policy will ensure that the safety and welfare of learners is put at the forefront of all NiNe undertakings. It will ensure that NiNe effectively able to support learners where safeguarding concerns arise.

Communication

NiNe will ensure that safeguarding information and training is communicated at all appropriate opportunities and the relevant records maintained for reference and audit. Staff will ensure that effective communication is achieved with learners, stakeholders and the wider community.

This policy will be made available in hard copy and in an electronic format on NiNe's SharePoint system. This policy will also be made available bilingually and in large print



NiNe Training Limited

upon request.

Monitoring and Review Processes

The process of integrating the safeguarding of vulnerable groups into the provision is led by a senior level safeguarding officer with the Directors being informed on several issues raised, to ensure that the highest levels of commitment are achieved. Areas for development will be incorporated within the Quality Development Plan.

Curriculum audits and other quality assurance activities within the delivery of learning will monitor, regulate, and report on the standard of safeguarding of vulnerable groups related learning and manage the continuous improvement of this through existing systems.

This policy will be reviewed annually in July or earlier where safeguarding guidance changes.

Complaints

All complaints will be taken seriously and dealt with in a timely and sensitive manner, in accordance with company procedures and the NiNe Complaints Policy and Procedure.



Useful Contacts

Wales Safeguarding Boards & Local Authority Contact Information

NiNe Training Limited operates within Neath Port Talbot and the wider area Western Bay Safeguarding Partnership, which includes the local authority areas of Swansea, Neath Port Talbot and Bridgend. The Western Bay arrangements and multi-agency protocols support the coordination of safeguarding practice and information sharing across agencies.

Neath Port Talbot

Social Services -	01639 686802 spoc@npt.gov.uk
Social Services Out of Hours Emergencies -	01639 895455
South Wales Police, Non-emergency	101

Western Bay [serves wider area that includes Swansea, Neath, Port Talbot & Bridgend]

For general enquiries about multi-agency safeguarding arrangements in the Western Bay area, the Western Bay Safeguarding Board (WGSB) can be contacted using the details below.

(Note: These contact details are for multi-agency coordination enquiries, not for referral of individual safeguarding concerns.)

Safeguarding Board [General Enquiries]	01639 763021 wgsb@npt.gov.uk
Child Referrals	01639 686802 spoc@npt.gov.uk
Adult Referrals	01639 686802 thegateway@npt.gov.uk



Prevent / Radicalisation Concerns

NiNe recognises the Prevent duty under the Counter-Terrorism and Security Act 2015, which requires specified authorities to have due regard to the need to prevent people from being drawn into terrorism. Indicators of radicalisation or extremist influences should be treated as a safeguarding concern and referred appropriately.

Additional information can be found through South Wales Police's website: [Prevent | South Wales Police](#)

If you have a concern about someone being vulnerable to radicalisation:

- complete the **All-Wales Prevent Referral Form** to send directly to Counter Terrorism Policing Wales: [All Wales Partners Prevent Referral Form](#)
- or contact the **Act Early Support Line** on **0800 011 3764** for confidential advice
- for urgent imminent risk or terrorism-related activity, call **0800 789 321** or **999**
- you should also raise the concern with your Safeguarding Officer and make a safeguarding referral to the local authority SPOC in line with the Safeguarding Policy.



Appendix 1

Smart Assessor Safeguarding Referral Process [Apprentices]

1. Purpose

To ensure that any cause for concern raised about an apprenticeship learner is recorded and monitored appropriately, and that these learners are provided with the appropriate support and referral information. To ensure that the Safeguarding and Prevent policies and procedures are adhered to.

2. Application

This instruction applies to all NiNe Training Limited staff and sub-contractors.

3. Procedure

- i. A Cause for Concern form should be completed if you or a learner identifies any of the issues below. This is not an exhaustive list. This form can be found in your forms section on Teams. Once completed, the form will need to be sent to the Safeguarding Officer.
 - Abuse Bullying
 - Cyber-bullying
 - Impairment of health
 - Inappropriate behaviour
 - Neglect
 - Radicalisation
 - Risk of self-harm
 - Unsafe working practices
- ii. The identified category should be ticked in Smart Assessor: S = Safeguarding
- iii. Submit the form and the appropriate person will be notified and will be in touch



Appendix 2

Safeguarding Referral Process [Other]

To be used with any candidates or learners not supported on the apprenticeship programme.
(Note: Where safeguarding concerns arise in school settings, NiNe staff will follow the host school's safeguarding reporting procedures in addition to notifying the Head of Operations.)

Learner Name:		Learner's Employer:	
Learner Reference Number:			
Staff Name:		Staff Position:	
Date concern raised:		Time concern raised:	
Reason for concern (please record the identified concerns as factually as possible - detailing who /what/ why when):			
For completion by Safeguarding Officer only:			
Safeguarding Officer Name:			
Please indicate which of the following categories this referral has been assigned to (delete as necessary):			
Safeguarding/ Prevent	Barrier to Learning	Wellbeing	No Further Action
If Safeguarding, please identify the main category of concern:			
Abuse	Bullying	Cyber-Bullying	Impairment of Health
Inappropriate Behaviour	Neglect	Radicalisation	Risk of Self-Harm
Unsafe Working Practices			
Date Concern Closed:			

Additional Information - For Designated Safeguarding Personnel use only:

--