

Safeguarding & Prevent Policy

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1.0 Position Statement

At Apprentify Limited, we recognise our legal and moral duty to promote the wellbeing and development of all learners and to protect them from harm. For that reason, Safeguarding and Prevent measures are integral to many aspects of the safe and supportive learning experience we strive to create. Apprentify is committed to embedding “best in class” Safeguarding and Prevent practice by creating and maintaining a safe and supportive environment for all. We acknowledge that “Safeguarding is everyone’s responsibility” and that everyone must work together to support people to make positive choices about any risks they face, and to protect those who may lack capacity to make decisions alone. Apprentify Limited is committed to providing learners and employees with the knowledge and skills to keep themselves and others safe and to be supported through challenging times in their lives by promoting a culture of openness and vigilance. This policy will continue to be widely promoted and embedded throughout Apprentify Limited.

This policy will be reviewed annually, or in the following circumstances:

- Any changes in government guidance and/or legislation
- Any other significant changes or events.

2.0 Purpose and Aims

The Safeguarding and Prevent Policy is for all Apprentify Ltd employees, learners, contractors, and visitors. It outlines our position on Safeguarding and Prevent and clarifies the action to be taken to ensure that we meet our duties in relation to protecting the safety and promoting the wellbeing of children and young people and vulnerable adults; it signposts to related policies and additional guidance. This policy adheres to the requirements of the Department for Education’s Keeping Children Safe in Education Statutory Guidance 2025, Working Together to Safeguard Children 2023 (updated June 2025), and the CONTEST Strategy 2023 to reduce the risk we face from terrorism.

The aims of this policy are to:

- Implement the highest possible standards and arrangements for Safeguarding and Prevent and to take all reasonable steps to promote the safety and welfare of all.
- Take appropriate action to see that learners, employees, contractors, and visitors are kept safe, both at home and when working with Apprentify Ltd.
- Prevent impairment of children’s mental and physical health or development.
- Promote and prioritise the safety and wellbeing of everyone associated with Apprentify Ltd.
- Support learners and employees to acquire knowledge and skills to keep themselves and their families safe.
- Respond to concerns and disclosures in an appropriate and timely manner.
- Provide information about support agencies.
- Meet our legal and statutory obligations.

2.1 How we will achieve our aims:

By:

- Professional, ethical, and moral leadership and management.
- Ensuring compliance with all relevant legislation, policies, and procedures.
- A team of trained Safeguarding Officers overseen by a Designated Lead, and a member of the Senior Leadership Team who takes lead responsibility for Safeguarding at the highest level in Apprentify.
- Wide promotion of alerting procedures.
- Providing effective management for employees through supervision, support, training, and quality assurance measures.
- Listening to learners, employees, contractors, and visitors with respect.
- Ensuring Apprentify's Safer Recruitment processes are followed.
- Disclosure and Barring Service (DBS) checks for employees in specific roles, following assessment.
- Induction to ensure learners, employees, contractors, and visitors are aware of, understand and follow the Safeguarding and Prevent policy and what to do if they have a concern.
- Continuing professional development opportunities.
- Building upon a culture of vigilance where learners, employees, contractors, and visitors know how they are expected to behave and feel at ease and can share concerns.
- Working with external agencies and partners to understand when and how to refer, communication protocols and to share and adopt best practice.
- Sharing Safeguarding and Prevent concerns effectively with the appropriate agencies.
- Working with employers so they understand their responsibilities and alerting procedures.
- Providing information and resources about Safeguarding and Prevent.
- Recording and storing information securely and appropriately and in line with GDPR.
- Managing any allegations against employees appropriately and in a timely manner.
- Implementing and embedding an Anti-Bullying and Anti-Harassment environment and robust policies to deal with any issues effectively.
- Ensuring Apprentify has effective complaints and whistleblowing policies.
- Providing a safe environment for all learners, employees, contractors, volunteers, and visitors, by adhering to health and safety measures in accordance with the law and regulatory guidance
- Keeping up to date Safeguarding and Prevent Action Plans.
- Reviewing Apprentify's Safeguarding and Prevent arrangements to support continual improvement.

In addition, Apprentify endeavours to prioritise the company's moral duty to keep everyone associated with the company safe, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation, and acknowledges the additional needs of individuals from minority ethnic groups, those with a disability and special educational needs and the barriers they may face.

3.0 Scope

This policy applies to all employees, contractors and agency workers involved in apprenticeship delivery, including subcontractors and partner organisations.

The policy applies to situations where a vulnerable person or group may be suffering significant harm, or is likely to do so, as action should be taken to protect them.

Apprentify recognises that threats may originate from a range of different extremist groups. Any form of extremist ideology, radicalisation or terrorist activity is also covered by this policy.

Apprentify works with both 16-18 learners, and learners aged 19 and over.

4.0 Definitions

What is Safeguarding?

In the UK, safeguarding means protecting peoples' health, wellbeing, and human rights, and enabling them to live free from harm, abuse, and neglect. Apprentify recognises that colleagues and employers have a role to play in safeguarding the welfare of young people and vulnerable adults and preventing their abuse. This policy focuses on protecting learners from abuse and neglect and is designed to provide a basic procedure which should be followed in the event of a safeguarding concern.

What is Prevent?

Prevent is one part of the UK's Contest Counter Terrorism Strategy. It includes four sections:

- **Pursue:** to stop terrorist attacks
- **Prevent:** to stop people becoming terrorists or supporting terrorism.
- **Protect:** to strengthen the UK's protection against extremism, radicalisation, and terrorism.
- **Prepare:** to mitigate the risk and impact of a terrorist attack on the UK.

Apprentify recognises that colleagues and employers have a role to play in safeguarding young people and vulnerable adults from radicalisation. This policy focuses on protecting learners from extremism and provides a procedure that should be followed in the event of a concern linked to Prevent. A full list of definitions linked to terminology used in this Policy can be found in Appendix 1.

4.1 Duty of Care

This is the duty which rests upon an individual to ensure that all reasonable steps are taken to ensure the safety of a learner involved in any activity, or interaction for which that individual is responsible. Any person in charge of, or working with learners in any capacity, is considered both legally and morally to owe them a duty of care.

4.2 Designated Person

A designated person is an employee who has responsibility for receiving and handling safeguarding, child and adult protection concerns and has been trained to perform the role to an appropriate level. At Apprentify, the Designated Safeguarding Lead (DSL) is our Functional Skills and Learning Support Manager, supported by a Dedicated Safeguarding Officer (DSO).

5.0 Safeguarding and Prevent Roles and Responsibilities

Apprentify's Chief Executive Officer has overall responsibility for the Safeguarding and Prevent Policy, ensuring Apprentify meets its duties under Safeguarding and Prevent, notwithstanding all staff, contractors and agency workers' individual responsibility to ensure that this policy is strictly adhered to.

5.1 The Board

- Ensure the DSL and DSOs undertake regular training in Safeguarding and Prevent.
- Ensure Apprentify has an up-to-date Safeguarding and Prevent Policy in place.
- Liaise with the Chief Executive Officer and DSL over matters regarding Safeguarding and Prevent

5.2 All employees:

- Contribute to creating a safe learning for all.
- Are aware of and follow Apprentify's Safeguarding and Prevent policies and procedures; they recognise, respond, and report any concerns that may be raised about the safety and welfare of a vulnerable person.

5.3 Operational managers, development coaches and trainers:

- Ensure that the learning environment is safe and that Safeguarding and Prevent is embedded within coaching and teaching practices to educate learners on staying safe, building resilience, and developing critical thinking skills.

5.4 Designated Safeguarding Officers:

- Respond to Safeguarding concerns within agreed timescales and keep accurate case notes.
- Report to the DSL to escalate any concerns that may require more specialist support.
- Refer cases of suspected abuse or concern to the appropriate services which may include child or adult social care (Local Authority) or Police.
- Carry out assessments to determine the level of risk, raise concerns inform the Local Authority and other partner organisations of any concerns.
- Refer people who require support to mental health, or substance misuse services and other charity organisations.
- Discuss cases with Apprentify employees on a "need to know basis" to protect the person's right to confidentiality.
- Raise awareness about Safeguarding and Prevent on an ongoing basis.
- Liaise with any case managers, social care workers, and appropriate senior leadership or employees regarding any matters of Safeguarding and safety.

5.5 Designated Safeguarding Lead:

- Responsible at an operational level within Apprentify, ensuring DSOs are supported and directed in their duties.
- Will always be available during Apprentify open hours or arrange suitable cover when this is not

possible.

- Develops resources, training, and support to provide advice and guidance to others.
- Refer cases to the Channel programme if there are concerns regarding radicalisation.
- Reports to Apprentify's Head of Quality
- Reports any key issues, risks or themes relating to Safeguarding and Prevent to the Board which will be formally recorded.
- Oversees the provision of resources and training for all employees.

5.6 Subcontractors and Partners:

- Maintain their own Safeguarding and Prevent policies that align with current statutory guidance, including:
 - Keeping Children Safe in Education
 - Working Together to Safeguard Children
- Prevent Duty Guidance
 - Appoint a DSL who is responsible for managing safeguarding concerns and liaising with our DSL.
 - Ensure all staff are trained to:
 - Recognise signs of abuse, neglect, and exploitation.
 - Respond appropriately to safeguarding disclosures.
 - Follow agreed referral pathways.

Safeguarding concerns must be reported to Apprentify's DSL within agreed timeframes and documented appropriately.

To ensure compliance and continuous improvement, Apprentify will:

- Conduct regular audits and reviews of safeguarding and Prevent practices.
- Require evidence of:
 - Staff training and qualifications.
 - Policy implementation and effectiveness.
 - Incident reporting and follow-up actions.
- Include safeguarding and Prevent compliance in:
 - Contractual agreements
 - Due diligence checks
 - Performance reviews

Non-compliance may result in remedial action, contract termination, or referral to relevant authorities.

5.7 Learners:

- Complete all safeguarding modules via Apprentify's BUD platform including British Values, radicalisation and extremism awareness, sexual harassment and staying safe online.
- Read and adhere to Apprentify's Safeguarding policy and procedures.

- Develop and take responsibility (at a level that is appropriate for their individual age, ability and vulnerabilities) for keeping themselves and others safe, including online.

6.0 Significant Harm Abuse, Signs, Symptoms, and Indicators

Significant Harm is the ill-treatment or the impairment of health or development including impairment suffered from seeing or hearing the ill treatment of another.

- Development- physical, intellectual, emotional, social, or behavioural development
- Health- physical or mental health
- Ill treatment- physical and sexual abuse and forms of ill treatment which are not physical.

Please note that the lists of signs and symptoms described below are not an exhaustive list and the type of abuse can happen in several forms and not just in isolation.

Physical Abuse is the causing of harm by physical injury to another person. This could include punching, kicking, scratching, suffocating, pulling hair, spitting, biting, slapping, pushing, rough handling, or scalding.

- **Signs may include** - Bruising, scratches, marks on the body or broken bones.
- **Symptoms and Indicators may include** - Anxiety, fear, self-harm, unexplained injuries, fractures, sprains, unexplained burn marks, flinching or cowering.

Sexual Abuse is the unwanted and/or forced sexual behaviour towards another person. This would include inappropriate comments, inappropriate touching, innuendo, sexual harassment, or rape.

- **Signs may include** - Bruising and injury to genital areas, distress, STI's, unexpected pregnancy, stained or torn underwear.
- **Symptoms and Indicators may include** - Severe distress, changes in behaviour, lack of trust, over sexualised behaviours, substance abuse.

Psychological and Emotional is the belittling of a person whether intended or unintended. Making a person feel uncomfortable, hurt, distressed by the actions/words of another person.

- **Signs may include** - Shouting, swearing, harassing, belittling, threatening and insulting behaviours, humiliating a person, talking in a different language, or devaluing a person.
- **Symptoms and Indicators may include** - Aggression or passivity, disturbed sleep patterns, talking a lot about a particular person, depression, acting withdrawn, unusual weight loss/gain, fear, confusion, running away, or low self-esteem.

Neglect is the act of not completing whether intentionally or unintentionally care for a person that needs support or relies on you to care for them.

- **Signs may include** - Failing to provide food, drink, shelter, privacy and dignity, access to health services, medication, and healthcare needs.
- **Symptoms and Indicators may include** - Weight loss, dirty clothes, unwashed, regular infections, poor hygiene, or untreated illness.

Financial Abuse is the abusive use of money that does not belong to you. This could include pressurising a person to provide money, stealing money or misusing money.

- **Signs may include** - A person not having money they thought they had, a person handing money to other people, a person struggling to buy food and other necessities.
- **Symptoms and Indicators may include** - A person feeling worried or anxious, signatures that do not match the person's own financial records.

Discriminatory Abuse is to single out a person or a group for special favour or disfavour. Discrimination can be shown on the following grounds: race, age, disability, gender reassignment, marriage and civil partnership, religion or belief, sexual orientation, and pregnancy and maternity.

- **Signs may include** - Showing lack of respect to an individual, not being allowed to access services, education, healthcare.
- **Symptoms and Indicators may include** - Being withdrawn, fearful, isolated, exhibiting fear, anxiety, or anger.

Institutional Abuse is when a person is subjected to routines and rules and strict boundaries over a prolonged period that have a significant effect on their day-to-day life. This would include people who have been in prison for a long time and people who have been in the armed forces for a sustained period.

- **Signs may include** - Doing whatever a person says, not being able to make their own decisions, not knowing how to complete certain tasks or loss of identity.
- **Symptoms and Indicators may include** - Low confidence, not being able to make decisions for themselves, fearing what may happen, asking regular questions, or wanting regular reassurance.

The Impact of Abuse and Neglect

Abuse can have severe long-term effects on a person's health, development, and wellbeing. It can have a significant impact on their self-worth, self-esteem, self-image and on their perception of themselves and others. The effects of abuse can also lead to challenges when forming or sustaining positive or close relationships and can carry serious implications for a person's mental wellbeing.

Early Help

Early Help is a service that provides support at the earliest opportunity that an issue emerges. If Early Help is appropriate for a family and there is a concern for a child or young person, the DSL will lead on liaising with other agencies regarding what support may be available via the Multi-Agency Safeguarding Hubs (MASH).

Other Specific Safeguarding Issues

All employees should also have an awareness of other specific safeguarding issues that can put children or vulnerable adults at risk of harm. These issues may also cause concerns for children or vulnerable people within the family home, and it is important that this is raised when you feel there are concerns where a child or vulnerable person may be at risk of significant harm. Any issues raised must be discussed with the DSL immediately.

Child and adult Sexual Exploitation (CSE)

Sexual Exploitation is a type of sexual abuse whereby a child or adult is exploited and given things such as gifts, drugs or alcohol, food, money, status, and affection, in exchange for performing sexual activities or acts. Children and vulnerable adults can be 'groomed' into believing that they are in a loving relationship and may not understand that the abuse is taking place.

Sexual Harm

Sexual Harm is a form of abuse that involves enticing or forcing a child or adult to take part in sexual activities or acts, and they may not be aware of what is happening. Acts of harm may include physical contact, penetration, or non-penetrative acts such as rubbing, touching outside of clothing, kissing and masturbation. Non-contact activities such as being made to look at or the production of sexual images, watching sexual activities, or grooming (including online), and encouraging the person to behave and participate in sexually inappropriate ways and behaviours.

County Lines Child Criminal Exploitation

Criminal exploitation is where children and vulnerable adults are manipulated and coerced into committing crimes. County Lines is the police term for "urban gangs" that exploit young people and vulnerable adults into moving drugs, normally a large city, into other suburban areas.

Domestic Abuse

Domestic abuse is any type of controlling, coercive, threatening behaviour, violence, or abuse between people who are, or who have been in a relationship, regardless of gender or sexuality. This can also be carried out by a family member or carer. Domestic abuse can include coercive control which is pattern of intimidation, isolation, degradation, and control and can be carried out with the threat of physical or sexual violence, psychological and/or emotional abuse, physical or sexual abuse, financial or economic abuse, harassment, and stalking. In addition, domestic abuse can also happen digitally or online. Witnessing domestic abuse as a child or vulnerable adult can have a detrimental impact on wellbeing and development.

Homelessness

Homeless can have a significant impact upon a person's wellbeing and welfare. A person may be living on the streets, moving between temporary accommodation or shelters, including houses of friends, family, and emergency accommodation.

Peer-on-Peer Abuse

Children and vulnerable adults can be vulnerable to abuse from their peers. It can include physical, sexual harassment and violence, 'sexting', emotional, via on and offline bullying, via relationship abuse and can even include grooming for sexual and criminal exploitation. Abusive behaviour should not be tolerated and passed off as "office banter" and should be dealt with appropriately using the Apprentify's Anti-Bullying and Harassment or Safeguarding Policy and procedures.

So-called ‘honour-based’ violence (HBV)

The Home Office define HBV as "a crime or incident which has or may have been committed to protect or defend the honour of the family and/or community." HBV can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect ‘perceived cultural and religious beliefs and/or honour’. Such violence can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their perceived honour code.

Female Genital Mutilation (FGM)

FGM is a crime in the UK and is known as female circumcision or genital cutting. It is important to note that there are no medical reasons for FGM. FGM is usually performed by someone with no medical training using instruments such as knives, scissors, razor blades or glass. Children are rarely administered with anaesthetic or antiseptic treatment and are often restrained by force. This type of abuse is used to control female sexuality and can cause severe long-lasting damage to a person’s physical and emotional health and wellbeing.

Forced marriage

Forced marriage is a criminal offence and is when a person has a pressure to marry and this relationship may have been chosen by the family. Behaviours may include threats, physical violence or sexual violence, or emotional and psychological pressure. The person may be made to feel they have brought shame on their family which can cause severe emotional harm, or they lack the mental capacity to be aware of what is happening. This can also include being taken to another country to marry.

The Voyeurism Act

The Voyeurism (Offences) Act 2019 is an Act of the Parliament which amends the Sexual Offences Act 2003 to make ‘Upskirting’ a specific offence of voyeurism. Upskirting is a criminal offence and is when a picture is taken under a person’s clothing without their knowledge to view their genitals or buttocks to obtain sexual gratification. Upskirting can also be carried out to cause humiliation or distress.

Cuckooing

Professional criminals can target the homes of adults with care and support needs so that the property can be used for drug-dealing – a process known as ‘cuckooing’. ‘Cuckooing’ means the criminals can operate from a discreet property, which is out of sight, making it an appealing option and then use the premises to deal and produce drugs in an environment under the police radar, usually staying for just one day at a time. The inhabitants of the property become frightened to go to the police for fear of being suspected of involvement in drug dealing or being identified as a member of the group, which would result in their eviction from the property.

Bullying including Cyber-bullying

Bullying is a behaviour that hurts another person and can include physical and emotionally abusive acts such as name calling, spreading rumours, threatening, hitting, or undermining someone. It can cause significant harm both physically and emotionally if repeated over time. Cyberbullying occurs online and can follow a person wherever they may be, it can be done via mobile phone, texting, social media networks or gaming platforms.

Mental Health and Wellbeing

Mental Health and wellbeing can be affected in many ways and can fluctuate at times due to stressors, challenges, and life events. It is important that this is acknowledged, and support can be accessed if required. Apprentify Ltd has Mental Health First Aid Advocates (MHFAs) available to support learners and employees regarding mental health first aid in the workplace.

Self-Harm

Self-harm is when a person intentionally causes damage or injury to their body, usually to cope with or express overwhelming emotional distress. Self-harm can be linked to thoughts of suicide or an intention to end their life, to punish themselves or release unbearable tension or to express extreme distress and could also be a cry for help.

Medical conditions

Medical conditions can present as a Safeguarding issue if the person does not have access to the appropriate medication if they are in a high-risk situation or role. Employees must disclose any medical conditions they feel may affect their duties and access any appropriate support if required.

Modern Slavery and Trafficking

Modern slavery is a crime which results in an abuse of a person's human rights. The Modern Slavery Act (MSA) 2015 is a vital way of protecting communities and individuals.

The Modern Slavery Act (MSA) 2015 covers four activities:

- Slavery - Exercising powers of ownership over a person
- Servitude - The obligation to provide services is imposed using coercion.
- Forced or compulsory labour - Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily.
- Human trafficking - Arranging or facilitating the travel of another person with a view to their exploitation.

Apprentify's Modern Slavery policy should be read in accordance with this Policy.

Sexting

Sexting is when messages and/or images, videos or text messages of a sexual nature are shared with another person. Children vulnerable adults may consent to sending a nude or partially nude image of themselves, but they can also be forced or coerced into sharing images by their peers or adults online.

Mate Crime

A 'mate crime' is when people pretend to be friends with someone who has learning disabilities but then go on to exploit and/ or abuse them. This has led to people losing their independence, financial, physical, and sexual abuse, exploitation and even murder. The way they are exploited may not be illegal, but it still has a negative impact on the individual. 'Mate crime' is carried out by someone the adult knows and often happens in private. In recent years there have been several serious cases relating to people with a learning disability who were murdered or seriously harmed by people who claimed to be their friend.

7.0 Safeguarding Procedure

7.1 Responding to a Concern/Allegation

All Apprentify colleagues will adhere to **The 5 R'S of Safeguarding**:

1. **Recognise** - Potential signs and symptoms of abuse.
2. **Respond** - To a disclosure against an Apprentify colleague, a disclosure from a child or adult, suspicions regarding the conduct of other colleagues or concerns from a colleague regarding a child or vulnerable adult.
3. **Report** - To the DSL or a DSO via Apprentify's Safeguarding Mailbox: safeguarding101@apprentify.com
It is then the responsibility of the DSL and/or DSO to make further decisions. Learners and employers will need to complete the [Safeguarding Declaration](#) (Annex 2) via the website or ring Apprentify's confidential safeguarding line on **0333 996 1800**. Please note, that between 6pm and 8am Monday to Friday, this safeguarding number is available to take voicemails only. All voicemails will be followed up the next working day.

The colleague must notify the DSL or a DSO as soon as possible, and submit Apprentify's [Safeguarding & Prevent Concern Form Final v1.0 19 Sept 25.docx](#) (Annex 3) by the end of the same working day the concern was raised, (but no later than 24 hours after the concern being raised) via Apprentify's Safeguarding Mailbox: safeguarding101@apprentify.com

In exceptional circumstances, where a colleague deems there to be an immediate risk to a learner and it is not possible to complete Safeguarding and Prevent Concern Form or contact the DSL or a DSO within the same day, they must report the matter - normally by telephone - directly to the Police, local Social Services Department, Duty Social Worker, or Police Service Child Protection Unit. In this situation ensure that the individual is accompanied and kept safe, pending advice from the relevant authorities.

4. **Record** - Exactly what has happened using the words said by the person disclosing the concern. This information should be signed, dated, and kept in a secure place as agreed within this policy.
5. **Refer** - This will be the role of the DSL who will make all further decisions. If, after careful assessment, the DSL considers that there is reasonable cause to suspect abuse, as a matter of urgency, they will refer the matter to the appropriate outside agency. An appropriate outside agency may include the Police, local Social Services, the NSPCC, Prevent / Channel Panel, or the Local Safeguarding Partnership. Where appropriate, referral to other external agents may take place where access to specialist advice and support is needed. The only agencies that can investigate child or adult protection cases are the Police and MASH (Multi-agency Safeguarding Hubs).

Employees collaborating closely with individuals should be alert to the possibilities of harm and they should follow the policy/process (see Annex 4) only and not investigate or offer advice.

If the allegation relates to an Apprentify colleague or board member, Apprentify's Director of HR will be involved. In this case the DSL will work in conjunction with the Director of HR to review the allegation and identify any next steps, including, where appropriate a referral to an external agency. Consideration will be given on whether the alleged offender should be suspended on full pay pending an investigation. The Director of HR will be responsible for any decisions on suspension. Any suspension will follow Apprentify HR policies and procedures and will be as short as is possible while ensuring the safety of the alleged victim. Apprentify will inform the DBS if concerns are raised about a colleague, and they leave the organisation.

Apprentify co-operates fully with any investigation carried out by a local authority and/or the police.

When an allegation against a learner is reported, allegations are managed on a case-by-case basis. Where a crime is suspected, Apprentify will support and encourage the learner to report this to the police. In the event of an allegation, the allegation must be reported to the DSL (or DSO) as soon as possible. An immediate Risk Assessment will be carried out for both the alleged perpetrator, the alleged victim, and other associated learners. Apprentify will ensure the safety of the alleged victim and any other associated learners who may be at risk. If necessary, Apprentify will visit the workplace and remove the learner(s) from the workplace while allegations are investigated and resolved.

If an allegation or suspicion of abuse is discovered or disclosed by an employer or learner, the DSL or DSO need to be informed immediately. This should be done by calling the direct safeguarding telephone number **0333 996 1800**.

If a learner has a concern/ allegation about a member of the Apprentify team:

- All learners are to be informed that if they have a concern over their own personal welfare and wellbeing that they do not feel comfortable talking to their development coach or trainer about, they are to contact Apprentify's DST.
- The DST can be contacted using the online form on the website or via the safeguarding line **0333 996 1800**.
- If a parent contacts you to report a concern about their child (Under 18) ensure you listen and record the details as per a learner reporting a concern to you.
- Ensure you have contact details for the parent. You must report the issue to the DST. The DST will then decide the appropriate course of action, and if a referral outside the organisation or to the LADO/LSAB is appropriate, consult with the parent as appropriate.
- Be mindful of confidentiality. No information should be passed to parents or carers without prior content to do so from an adult learner.
- If you observe a safeguarding issue taking place within the working practices of an employer's setting, act to stop the activity immediately, and inform the individual of your concerns, ask them to remove themselves from the area and advise them you will inform their senior manager.
- Take any actions to secure the safety of the individual, this may involve staying with them until a responsible adult can be located. Inform the DST. Be mindful of differences between poor practice and a safeguarding issue and apply your action appropriately.
- If a learner reports unsafe practices or safeguarding issues to you within their working environment, advise the learner to follow in house reporting or whistle blowing procedures. You may support the learner in speaking to the appropriate senior team members. Report the incident to the DST who will offer additional guidance and signposting for the Learner and will monitor.

- It is important you do not pass any information to other parties or try to investigate the concern yourself. All concerns should be reported to the DST as soon as possible.

7.2 Low level concerns

Low level concerns follow the same procedure for confidentially sharing disclosures with the DST, or they can be discussed with a line manager or HR representative first. The DST should ultimately be informed of all low-level concerns and make the final decision on how to respond.

7.3 Allegations against Learners

Apprentify recognises that young people can abuse their peers. Child on child abuse can take many forms, including (but not limited to) bullying, cyberbullying, hazing (initiation type violence), sexualised bullying and violence and sexting. Apprentify is mindful that some potential issues may be affected by the gender, age, ability and culture of those involved.

Apprentify believes that abuse is abuse and it will never be tolerated, dismissed or minimised.

Learners who have experienced child on child abuse will be supported by:

- Offering them an immediate opportunity to discuss the experience with an employee of their choice.
- Being advised to keep a record of concerns as evidence and discussions regarding how to respond to concerns and build resilience, if appropriate.
- Providing reassurance and continuous support.
- Working with the wider community and local/national organisations to provide further or specialist advice and guidance.

Learners who are alleged to have abused other learners will be helped by:

- Discussing what happened, establishing the specific concern and the need for behaviour to change.
- Informing parents/guardians and employers to help change the attitude and behaviour of the learner, if appropriate.
- Provide appropriate education and support.
- Speaking with/referring to police or other local services (such as early help or children's specialist services) as appropriate.

8.0 The Prevent Duty - Radicalisation, Extremism and Terrorism

The Prevent strategy was published in 2011 by the Government and is part of the overall counter-terrorism strategy, **Contest**. The strategy aims to reduce the threat to the UK from terrorism by preventing people becoming drawn into terrorism or becoming a terrorist. Delivery Prevent is grounded in early intervention and safeguarding.

There are three key objectives:

- Respond to the ideological challenge of terrorism and the threat from those who promote it.
- Prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support.
- Work with sectors and institutions where there are risks of radicalisation that we need to address.

Apprentify recognises it must have due regard to the need to prevent people from being drawn into terrorism (Section 26 of the Counter-Terrorism and Security Act 2015). This is known as the Prevent Duty.

Apprentify will maintain a Prevent Risk Assessment and Action Plan, and this will be informed by engagement with Regional Prevent co-ordinators to comply with the duty and address whatever risks have been identified. Localised information will identify, prioritise, and facilitate delivery of projects, activities, or specific interventions to reduce the risk of people being drawn into terrorism in each region.

Apprentify will provide employees with training that gives them the knowledge and confidence to identify people at risk of being drawn into terrorism, and to challenge extremist ideas which can be used to legitimise terrorism and are shared by terrorist groups.

Apprentify is committed to ensuring that our resources do not provide a platform for extremists and are not used to disseminate extremist views. This includes IT equipment available to employees will have web filtering solutions that limit access to terrorist and extremist material in place.

Our DST will know where and how to refer people for further help. Prevent awareness training is a key part of this and is completed as part of Apprentify's onboarding process.

8.1 Channel Guidance

Channel is part of the Prevent strategy and is a multi-agency approach to identify and provide support to individuals who are at risk of being drawn into terrorism. Channel is a programme that focuses on providing support at an early stage to people who are identified as being vulnerable and unlike mainstream safeguarding for adults and children, there is no threshold to make a Prevent referral for an individual to access assessment and specialist support. There may be cases that require a safeguarding response in conjunction with Prevent.

Channel uses a multi-agency approach to protect vulnerable people by:

- Identifying a person at risk
- Assessing the nature and extent of the risk
- Developing the most appropriate package of support for the person.

Channel can be appropriate for an individual who is vulnerable to being drawn into any form of terrorism and is about ensuring that people of any faith, ethnicity or background receive support before their vulnerabilities are exploited by those that may wish for them to embrace terrorism, and before they become drawn into criminal terrorist related activity.

The Police co-ordinate this by requesting information from panel partners about a person that has been referred. They will use this information to make an initial assessment of the nature and extent of the vulnerability and present this to a panel. The appropriate Local Authority will chair the Panel and develop a multi-agency support plan for the individual at risk whilst maintaining a link with the Police. Consent should always be sought before a Channel referral is made to promote successful and meaningful engagement; however, there may be occasions where consent cannot be obtained, and the referrer may have to consider Apprentify's information sharing protocols and consult with partners due to the level of risk.

8.2 Prevent Procedure

Prevent referrals are likely to be made in the first instance by people who come into contact with those who appear to be at risk of being radicalised. There is no single model of a person's radicalisation journey or single profile of a radicalised person. Frontline professionals, when deciding whether to make a referral, should consider whether they believe the person they are concerned about may be on a pathway that could lead to terrorism.

Signs that extremist views are being adopted, including changes in behaviour that might signal a concern, can be used to consider whether a referral should be made to seek support under Prevent. In determining whether a concern meets the threshold for referral to Prevent, it is important to consider the harm posed to the person, as well as whether accessing support through Prevent might stop potential wider societal harm committed by the person.

The [notice, check, share procedure](#) should be applied.

Any concern should be escalated to Apprentify's DSL to check. If there is a concern about potential radicalisation or a reason to believe that someone is at risk of becoming involved in terrorism or supporting it, a referral should be made to police, who will assess whether the person is suitable to be considered by a Channel panel for support.

Anyone making a referral should ensure there is concern that someone may be susceptible to becoming involved in terrorism or supporting it. There may be times when the precise ideological driver is not clear. Yet, like any safeguarding mechanism, it is far better to receive referrals which turn out not to be of concern than for someone who genuinely needs support to be missed.

Providing feedback on referrals is not always possible to protect the confidentiality of the person referred once received by police.

If you are unsure whether a concern constitutes a Prevent referral, we encourage seeking advice from your DSL, or the relevant DfE Regional Prevent Education Co-ordinator (<https://www.gov.uk/guidance/regional-prevent-education-coordinators#contacting-your-co-ordinator>), in the first instance. Alternatively, you can call

the National Prevent Advice Line on 0800 011 3764, which is a confidential advice line staffed by trained officers.

The Prevent Referral Form is an online form which can be found via your local Police or Local Authority. The submission destination depends on the learner's location, so you **must access and then send the completed form to the local Prevent or Police Prevent Team in the local authority where the learner is based or where the concern originated**. Your relevant DfE Regional Prevent Education Co-ordinator should be able to help you.

N.B. Channel Panels only receive referrals via local Prevent Teams, not directly from Apprentify.

Further information and updated guidance from April 2025 can be sought at [Channel guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/channel-guidance)

8.3 The Vulnerabilities and Possible Indicators of Radicalisation

Please note this is not an exhaustive list and indicators are not always in isolation.

- Influence from peers, or charismatic individuals or material, including via the internet that can incite animosity and violence.
- Exposure to counter-political movements, ideologies, and unorthodox beliefs
- Beginning to explore ideas and issues around identity.
- Rejection by peer, faith or social group or family
- Living in a community where there is social exclusion.
- Experience of poverty or ill treatment of their faith/ethnic group
- Dissatisfaction with government foreign policy, international disputes, political views etc.
- Exposure to gangs, social/criminal networks (including online), risky institutions/places.
- Learning disabilities
- Abusive family environments
- People who have recently been released from prison or who are currently in prison/youth offenders' institutes
- Post traumatic events
- Low self-esteem.

Apprentify recognises the significant risk relating to radicalisation, extremism and terrorism and the duty to report any concerns to the appropriate services. In relation to any Prevent concerns, colleagues, contractors and agency workers must contact the DSL to discuss and follow the same procedure as with any safeguarding issue. A referral may be made by the Lead with the person's consent to Channel if concerns are raised regarding Prevent.

8.4 Our Responsibilities

In relation to our responsibilities in line with the Prevent agenda we will:

- Closely follow any locally agreed procedure as set out by the Home Office and Local Authority and/or Local Safeguarding Partnership's agreed processes and criteria for safeguarding individuals vulnerable

to extremism and radicalisation.

- Strive to eradicate the myths and assumptions that can lead to some people becoming alienated and disempowered, especially where the narrow approaches people may experience elsewhere may make it harder for them to challenge or question these radical influences.
- Ensure all our teaching and coaching help learners build resilience to extremism and give them a positive sense of identity through the development of critical thinking skills.
- Ensure all our employees are equipped to recognise extremism and are skilled and confident enough to challenge it.
- Keep up to date with developments and good practice and keep our Prevent Risk Assessment and Action Plan under review.

8.5 Reporting Suspicious Activity

If anything gives you cause for concern, do not rely on someone else – ACT. Find out about what kind of activity and behaviour you should report on the [Action Counters Terrorism \(ACT\) website](#).

8.6 Run, Hide, Tell

The Government has provided guidance regarding what to do in the event of a Terrorist Attack. Employees, learners, contractors, volunteers, and visitors must make themselves familiar with this guidance.

RUN to a place of safety. This is a far better option than to surrender or negotiate. If there is nowhere to go, then...

HIDE It is better to hide than to confront. Remember to turn your phone to silent and turnoff vibrate. Barricade yourself in if you can. Then finally and only when it is safe to do so...

TELL the police by calling 999.

9.0 The Reporting of Prevent Concerns v Safeguarding Concerns

The reporting of Prevent concerns versus safeguarding concerns shares similarities but also has distinct differences in focus, escalation, and external involvement. Here's a breakdown tailored for an apprenticeship training provider such as Apprentify:

Aspect	Safeguarding Concern	Prevent Concern
Focus	Protection from abuse, neglect, exploitation, or harm	Preventing radicalisation and extremism
Legal Basis	Care Act 2014, Children Act 1989/2004	Counter-Terrorism and Security Act 2015
Indicators	Physical/emotional abuse, neglect, financial exploitation	Expressing extremist views, isolation, sudden changes in belief or behaviour
Referral Pathway	Local authority safeguarding team or social services	Local Prevent team via the National Prevent Referral Form
External Agencies	Social care, police (if needed), health services	Channel Panel (multi-agency), police, Prevent coordinators

DSL Role	Coordinates safeguarding responses	Also responsible for Prevent concerns and referrals
Training Required	General safeguarding awareness	Specific Prevent duty training (e.g. spotting signs of radicalisation)

10.0 Online Safety

It is recognised by Apprentify that the use of technology presents challenges and risks to learners and adults both inside and outside of the training provision. All learners and employees are informed of safe practices when using the internet and are encouraged to be vigilant and report any harmful content.

Apprentify identifies that the issues classified within online safety are considerable but can be broadly categorised into four areas of risk.

- Content: being exposed to illegal, inappropriate or harmful material
- Contact: being subjected to harmful online interaction with other users
- Conduct: personal online behaviour that increases the likelihood of, or causes harm
- Commerce: financial exploitation and data misuse. It includes scams, in-app purchases, gambling-style games, fake competitions, and misleading adverts that target users.

For further details, refer to Apprentify's Online Safety Policy 2025-26.

11.0 Safeguarding Learners with Special Educational Needs and Disabilities

Apprentify acknowledges that learners with an education health care plan (EHCP), special educational needs, and disabilities (SEND) can face additional safeguarding challenges as they may have an impaired capacity to resist or avoid abuse. They may have speech, language and communication needs which may make it difficult to tell others what is happening.

Apprentify will ensure that learners with EHCP and SEND, specifically those with communication difficulties will be supported to ensure that their voice is heard and acted upon.

Members of staff are encouraged to be aware that learners with EHCP and SEND can be disproportionately impacted by safeguarding concerns such as bullying. All colleagues will be encouraged to appropriately explore possible indicators of abuse such as behaviour/mood change or injuries and not assume that they are related to the learner's disability and be aware that learners with EHCP and SEND may not always outwardly display indicators of abuse.

Apprentify understands the importance of good mental health and wellbeing for all learners, we aim to:

- Treat mental health and wellbeing very seriously and compassionately.
- Promote mental health and wellbeing through awareness, training and resources for learners, staff and employers.
- Work together as an organisation to safeguard those at risk of poor mental health.
- Identify issues proactively and work towards resolving them.

12.0 Confidentiality and Information Sharing

Apprentify recognises that all matters relating to learner protection are confidential. The DSL will only disclose information about a learner to other members of staff on a need-to-know basis.

All members of staff must be aware that whilst they have a duty to keep information about learners, families and colleagues confidential, which they have access to because of their role, they also have a professional responsibility to share information with other agencies to safeguard learners.

Members of staff know how to maintain an appropriate level of confidentiality whilst at the same time know they must never promise a learner that they will not tell anyone about a concern or allegation as this may ultimately not be in the best interests of the learner.

The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purpose of keeping learners safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare to protect the safety of our learners.

Therefore, it is important for all colleagues to follow the statement of confidentiality outlined below:

Information that is given to us will be treated confidentially. Information will only be passed to third parties with the consent of the individual concerned. If there are concerns about the person's safety, wellbeing or legal requirements, the information may be shared with professionals in the local authority/policy or health agencies, after approval from the Designated Safeguarding Lead.

Therefore, colleagues must not promise confidentiality.

13.0 Staff Support

Where a member of staff finds a safeguarding incident distressing, they may wish to access external services such as counselling via the Help@Hand app or alternatively contact Apprentify's HR team.

14.0 Reporting

A monthly report is shared with the Head of Quality who disseminates the report to the Senior Leadership Team.

15.0 Review

This policy will be reviewed annually or earlier if deemed necessary.

Annex 1

Definitions

For the purposes of this policy, the following words and phrases have the meanings as indicated:

- **Abuse** is a form of maltreatment. Somebody may abuse or neglect a person by inflicting harm or by failing to act to prevent harm. Abuse can take different forms, such as physical abuse, sexting, sexual violence, and sexual harassment. Expectations around learner behaviour form part of the Code of Conduct, and Learner Disciplinary Policy, which is promoted throughout the learning experience.
- **Channel** forms a key part of the Government Prevent Strategy (see below for Prevent definition). The process is a multi-agency approach to identify and provide support to individuals who are at risk of being drawn into terrorism and extremism.
- **Child on Child Abuse** is inappropriate behaviours between children that are abusive in nature including physical, sexual, or emotional abuse, exploitation, sexual harassment, all forms of bullying, coercive control, hazing/initiation rituals between children and young people, both on and offline (including that which is within intimate personal relationships).
- **Extremism** is defined in the 2011 Prevent Strategy as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, mutual respect and tolerance of different faiths and beliefs. Also included in the definition is extremism are calls for the death of members of the UK armed forces, whether in this country or abroad.
- **Operation Encompass** is a national operation that directly connects the Police with schools and learning settings to secure better outcomes for children and young people who are subject or witness to police-attended incidents of domestic abuse. Provision of support within the learning environment means children and young people are better safeguarded against the short-, medium- and long-term effects of domestic abuse.
- **Prevent** refers to the Prevent Strategy, published by the Government in 2011, which is part of the Government's overall counter-terrorism strategy, CONTEST. The aim of the Prevent strategy is to reduce the threat to the UK by stopping people becoming terrorists or supporting terrorism.
- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Safeguarding** is the process of protecting vulnerable people, whether from crime or other forms of abuse.
- **Terrorism** is defined in the Terrorism Act 2000 (TACT 2000). In summary, this defines terrorism as an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.
- **Vulnerable adult** means any person aged 18 or over who is or may need community care services by reason of mental or other disability, age or illness and is or may be unable to take care of themselves,

or unable to protect themselves against significant harm or exploitation. It should be noted that the definition of a vulnerable adult means that this can be a transient category for some individuals.

Annex 2 – Safeguarding and Prevent Declaration Form

[*Click here to access the Form*](#)

Annex 3 – Safeguarding and Prevent Report Form

[*Click here to access the Form*](#)

Annex 4 - Safeguarding and Prevent Referral Process

[*Click here to access the process*](#)