

## **Safeguarding and Prevent Policy**

**April 2025**

### **Introduction**

#### **Policy Statement**

TPC Health Apprenticeships is strongly committed to practices that protect adults at risk from abuse, neglect or significant harm. We have specifically omitted references to 'young people' in this policy as our apprenticeship programmes are only applicable for adult learners and we, therefore, do not have any 'young people' on programme. Should this situation change, we will amend this policy accordingly.

Staff, leaders and governors recognise and accept their statutory responsibility (as set out in the Apprenticeships, Skills, Children and Learning Act 2009 and Keeping Children Safe in Education (KCSIE 2024) to develop awareness of the risks and issues involved in safeguarding and their duties to safeguard and promote the welfare of its learners.

In accordance with the Prevent statutory duty, introduced through the Counterterrorism and Security Act 2015 and updated in December 2023, this policy also incorporates the organisation's Prevent and British Values Policy.

#### **Definitions**

For the purposes of this policy and procedure, an 'adult at risk' previously known as a 'vulnerable adult' is defined as any person 18 years or over who is or appears to be eligible for assistance by reason of mental ill health, physical or learning disability, illness or age-related frailty and/or; may be unable to take care of him/herself or unable to protect him/herself against significant harm or exploitation.

#### **Our approach**

At TPC Health Apprenticeships, Safeguarding and Prevent are integral to our approach to delivering high quality apprenticeships. We are committed to ensuring the safety, wellbeing, and resilience of all our apprentices and staff. Our approach focuses on creating a secure and inclusive learning environment while fulfilling our statutory responsibilities under the Safeguarding and Prevent Duty legislation. We have a zero tolerance of any form of unlawful discrimination, prejudice, bullying and harassment and are committed to ensuring all people are treated with dignity and respect regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation.

#### **TPC Health Apprenticeships will**

- Aim to protect, as far as possible, the wellbeing of adults who may be considered at risk, by ensuring that appropriate arrangements are in place to provide a safe and secure learning environment.
- Each apprentice will be assigned a programme support coach to check in with them regularly as well as carry out further discussions on Safeguarding and Prevent during the tripartite review.

- Assign a Designated Safeguarding & Prevent Lead and a Deputy to manage all safeguarding issues.
- Offer support at all stages in any safeguarding disclosures or incidents.

### **Who are we Safeguarding**

TPC Health Apprenticeships safeguarding arrangements are to protect all our apprentices, employees and stakeholders to whom we may meet.

An adult at risk means a person, aged 18 or over, living in certain situations, detained in custody, supervised in the community or receiving specific services.

TPC Health Apprenticeships are mindful that several other situations may render a person 'at risk' such as victims of domestic abuse, migrants, living in a drug-misusing family, living in areas of high crime, being likely to face racism or having caring responsibilities.

TPC Health Apprenticeships also recognise

- The safety and wellbeing of apprentices is paramount.
- All apprentices, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have the right to equal protection from all types of harm, abuse and radicalisation.
- Working in partnership with apprentices and with other agencies is essential in promoting a safe environment and the Prevent Duty.

### **Safeguarding Terms**

The following should be considered when working with apprentices particularly when we are in contact with adults at risk but is equally applicable to our apprentices.

- Sexual abuse or inappropriate relationships and harmful sexual behaviour. • Physical and emotional abuse or neglect, including Female Genital Mutilation, breast Ironing and male circumcision undertaken anywhere else than a hospital.
- Exploitation, including financial, sexual, forced marriage or gang related activity.
- Sexual extortion
- Neglect
- Grooming behaviour.
- Domestic violence.
- Bullying, including cyber bullying, bullying in the training centre or the workplace.
- Victimisation.
- Harassment
- Self-harm.
- Inappropriate taking of and/or sharing of unsolicited photographs (sharing of nude/semi-nude images and Up-Skirting)
- Unsafe activities or environments
- Crime, including knife crime and gang related activity
- Trafficking
- Modern Slavery (including Gangmasters and labour abuse)

### **Identifying Harm**

Through our work with apprentices and employers, TPC Health Apprenticeships staff are well placed to notice changes in behaviour and appearance which may be due to harm. These changes could include:

- The apprentice discloses that they are being harmed or are at risk of harm.
- Absence or missing from training or work.

- Behavioral problems.
- Change in dress or physical appearance.
- Rewards, including unaccounted for money, expensive clothing or footwear or devices such as mobile phones.
- Reduced contact with, or becoming withdrawn from, friends or family.
- Substance abuse.

### **Identifying Radicalisation**

Staff should be vigilant to the signs of radicalisation. Radicalisation can be difficult to spot, but signs that may indicate that an apprentice or staff is being radicalised include:

- Not adhering to/upholding the British Values of; Democracy, Rule of Law, Individual Liberty and Respect, Tolerance of different faiths and beliefs, and those with none
- Isolating themselves from family and friends and learning groups
- Talking as if from a scripted speech
- Unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around the internet.
- Wanting to blame others (crisis narrative).

### **Legislation**

TPC Health Apprenticeships Safeguarding and Prevent Policy have been developed in accordance with the principles and guidance of the following legislations:

- The Voyeurism Act 2019.
- Education Act 2002.
- Safeguarding Vulnerable Groups Act 2006.
- The Care Act 2014.
- Equality Act 2010
- Data Protection Act 2018 and UK GDPR.
- Health and Safety at Work Act 1974.
- The Disclosure and Barring Service (DBS).
- Prevent Duty Guidance 2023
- Guidance for safer working practice for those working in education settings 2022

### **Promoting the Policy**

**TPC Health Apprenticeships** role has a clear commitment to safeguarding and prevent and our team are dedicated to ensuring that they promote and implement the policy ensuring it is reviewed and regularly acted upon.

- During our early discussion with employers, we will make them aware of their safeguarding obligations and offer any support through guidance and training.
- Apprentices will gain awareness of Safeguarding and Prevent and understand how to access TPC Health Apprenticeship support services. This will be covered in induction with full training given and this will be further integrated throughout the apprentice's journey with support from the programme support coaches.
- Our staff working with apprentices have Safeguarding and Prevent training which will be reviewed annually or at a time that the legislation deems appropriate if this is earlier
- Post holders who meet the definitions set down in legislation and government guidance will be required to comply with the relevant Disclosure and Barring Service check, where there are specific requirements of the field within which they work that requires a relevant check.

- We will maintain open channels of communication with each employer. Apprentices may act very differently depending on their environment and may feel more comfortable discussing sensitive issues with different people

### **Employers Role**

- Familiarise themselves with relevant government legislation
- Take appropriate steps to understand what safeguarding means in practice at their organisation, in the context of the responsibilities they have for the apprentices they employ.

### **Raising, recording and investigating concerns**

If staff, apprentices, stakeholders have a concern or witnessed abuse (verbal, physical, bullying etc) or are given sensitive information relating to safeguarding or radicalisation , they should

- Take seriously any concerns raised
- Re-assure the person that they have done the right thing
- Take positive action to ensure the protection of individuals involved
- Ensure that information is handled in a confidential manner, however, don't promise confidentiality as the matter will need to be discussed with the Safeguarding and Prevent Lead and could be escalated to external agencies if necessary
- Try not to ask questions, if you must, make sure they are open-ended questions to clarify the situation
- Inform the Designated Safeguarding Lead
- If any employer, apprentice or stakeholder has any cause to be concerned regarding the behaviour of a staff member of TPC Health Apprenticeships they should contact the Designated Safeguarding Lead immediately.

### **Designated Safeguarding Lead (DSL)**

TPC Health Apprenticeships has a Designated Safeguarding Lead (DSL) who will have responsibility for overseeing all Safeguarding and Prevent matters. The DSL will undergo appropriate training and remain up to date with relevant policies and procedures.

#### **Designated Safeguarding Lead**

**Tracey Taylor**

[tracey.taylor@tpchealth.com](mailto:tracey.taylor@tpchealth.com)

**07300 219449**

The DSL will ensure that:

- Recommendations for changes to this policy and associated procedures taking into account legislative changes to the Board of Directors
- Undertake regular and appropriate training
- Make the decision to investigate any allegations or concerns
- Address any immediate protection issues
- Carry out any internal investigations regarding Safeguarding
- Respond as required to any Prevent concerns
- Make the decision to refer to appropriate external agencies, i.e. Police, Social Services, Local Safeguarding Board, Ofsted, Counter Terrorism Unit and/or Channel
- Ensure all staff, apprentices' stakeholders and governors are trained appropriately

## **Prevent Duty**

In the exercising of our functions as a training provider TPC Health Apprenticeship will have due regard to the need to prevent people from being drawn into terrorism. TPC Health Apprenticeships regards the Prevent Duty as being an integral part of our Safeguarding Strategy, in line with our Prevent risk assessment and action plan. The Safeguarding Policy and procedure take into account this as a key safeguarding concern.

**CONTEST** - is the UK's counter-terrorism strategy and it aims to reduce the risk from terrorism so that people can go about their lives freely and with confidence.

### **CONTEST has 4 strands:**

- Pursue: investigate and disrupt terrorist attacks.
- Prevent: stop people from becoming terrorists or supporting terrorism
- Protect: improve our protective security to stop a terrorist attack.
- Prepare: work to minimise the impact of an attack and to recover as quickly as possible.

## **Radicalisation**

Is the process by which a person comes to support terrorism and extremist ideologies. An at risk apprentice or staff member may be more susceptible to being drawn towards or being targeted by those involved in extremist ideology.

**Our Prevent local contact is - [Helene.MORRIS@education.gov.uk](mailto:Helene.MORRIS@education.gov.uk)**

## **British Values**

An important part of Prevent is also the promotion of British Values. These are the norms that shape our society, and which are enshrined in law, through legislation such as Equality Act 2010. British values are described as:

- Democracy
- The rule of law
- Individual liberty and mutual respect
- Tolerance for those with different faiths and beliefs

Apprentices are encouraged to explore ideas in a context where these values are recognised and respected.

## **TPC Health Apprenticeships Role**

- To promote British values throughout an apprentice's programme.
- Provide a dedicated programme of study which defines and explores British values and how they influence our society.
- Create opportunities for apprentices to apply their learning to relevant situations and contexts.
- Encourage apprentices to respect each other and their differences, including with regard to protected characteristics outlined in the Equality Act 2010.

## **Employers Role**

- Demonstrate a commitment to British values and ensure apprentices have the opportunity to embed these values in the workplace.
- Adhere to the requirements of the Equality Act 2010

## **Staying safe Online**

The growing use of the internet and digital technology offers significant opportunities to enhance the learning experience for apprentices and broaden their personal horizons. However, with diverse ways to access and interact with online content, it is crucial for individuals to develop the skills needed to navigate the internet safely and adopt appropriate online behaviours.

Understanding how to protect themselves and safeguard their personal data is essential. Online dangers, such as bullying, abuse, revenge porn, grooming, identity theft, and viruses, pose real threats.

### **TPC Health Apprenticeships Staff**

Safeguarding staff working with apprentices is essential to creating a safe and supportive environment for both staff and apprentices. To ensure this, clear policies and training on safeguarding procedures are in place, enabling staff to identify and respond to risks effectively. When using IT and learning platforms, staff will be supported with secure systems that include monitored communication channels, role-specific access permissions, and robust data protection measures. Regular audits and updated training help staff navigate potential risks, such as cyber threats or inappropriate online interactions.

### **TPC Health Apprenticeships**

Assess how apprentices may be at risk or harm using the technology or internet and provide training so that they are able to work safely and effectively online. Our training staff have the expertise (through training) to guide the apprentices to make informed decisions about the authenticity of online information and provide guidance on what is and is not acceptable use of the internet. TPC Health Apprenticeships ICT policies incorporate Cyber Essential Plus to give extra reassurances our apprentices stay safe online.

### **Employers**

Have a duty to establish clear policies on acceptable online behaviour both personally and professionally. Apprentices are made aware and have read and understood these guidelines, promoting accountability and respectful interactions. Communicate any concerns about safety online to the safeguarding DSL [tracey.taylor@tpchealth.com](mailto:tracey.taylor@tpchealth.com)

### **Safer Recruitment**

Our recruitment procedures will include rigorous checks to ensure that all staff are suitable to work with apprentices.

### **Record Keeping**

Accurate and detailed records of safeguarding concerns, actions taken, and referrals will be maintained securely and in line with data protection regulations.

### **Review and Training**

This Safeguarding and Prevent Policy will be reviewed annually to ensure it remains up-to-date and effective. Staff will receive regular training on Safeguarding and Prevent matters.

### **External Support**

- Our organisation will work in partnership with local safeguarding boards, authorities, and other relevant agencies to ensure effective safeguarding and Prevent practices.
- All staff members, apprentices, and relevant stakeholders are made aware of the policy and their responsibilities in safeguarding and promoting a safe learning environment.

## Further support services for concerns about wellbeing and mental health.

Any of our apprentices experiencing a mental health or wellbeing difficulty can ask for support from us. We have clinically trained experts who can help with a variety of personal difficulties which include. The apprentice programme support coach will sign post to the right support team member.

- Anxiety
- Confidence
- Depression
- Identifying trauma
- Loss/bereavement
- Work/life/study balance

or if there is other external support required see below:

If there is an immediate risk of harm or other emergency, you should call 999 and speak to the emergency services.

For non-emergency calls you can contact the Police on 101 or for medical concerns the NHS on 111.

Anti-terrorist hotline: call 0800 789 321 – for concerns about possible terrorist activity, you can also make your report anonymously. <https://www.gov.uk/report-terrorism>

Mind: call 020 8519 2122 - [info@mind.org.uk](mailto:info@mind.org.uk) - Advice and support around mental health or text 'shout' to 85258 a free, confidential, anonymous text support service.

Samaritans: call 116123 – <https://www.samaritans.org/how-we-can-help/contact-samaritan/> for support with many forms of emotional distress

NSPCC Helpline: call 0808 800 5000 – [help@nspcc.org.uk](mailto:help@nspcc.org.uk) advice for anyone who has concerns about the welfare of a child or young person Report online material promoting terrorism or extremism Report illegal or harmful information, pictures or videos you've found on the internet.

All Safeguarding and Prevent concerns will be fully investigated and appropriate actions taken. TPC Health Apprenticeships will review this policy annually as a minimum in-line with any regulatory requirements.

## This policy has been approved and authorised by:

**Name:** Andrew McDowell

**Position:** Partner

**Date reviewed:** 1 April 2025

**Next review date:** 31 March 2026

**Version Number:** 2

**Signature:**

