

Safeguarding and Prevent Policy

Version	1.4	Approved by:	
Date published	09/10/2025		
Review period	Annually		
Related legislation and/or standards	Children Act 1989, Safeguarding Vulnerable Groups Act (SVGA) 2006, Equality Act 2010		

Contents

Purpose	1
Safeguarding	2
Definition	2
Safeguarding Strategy	2
Designated Safeguarding and Prevent Contact	3
Types of Abuse	3
Prevent	4
Purpose of Prevent	4
Responsibilities	4
Extremism	4
Terrorism	4
CONTEST	4
Radicalisation	5
Grooming	5
Cyberbullying	6
Reporting for FGM	6
Safeguarding Code of Conduct	7
Introduction	7
General	7
Physical Contact	7
Private Meetings and One to One Training	7
First Aid	7
Infatuations and Crushes	8
After Hours Activities	8
Reporting Incidents	8
Personal and Written Communication	8

Purpose

The Safeguarding and Prevent Policy for reflects the importance of safeguarding and promoting the welfare of all our learners and employees by protecting them from physical, sexual or emotional abuse, neglect and bullying.

ATC Training are committed to providing a safe environment for all our learners so that they can learn in a relaxed and secure atmosphere. We believe every learner or trainee should be able to participate in all activities in an enjoyable and safe environment and be protected from harm.

ATC Training have a statutory requirement under Sections 27 and 47 of the Children Act 1989 to assist the Local Authority Social Services Department acting on behalf of children in need.

The principle objectives of this policy are that:

- All employees and associates will understand what radicalisation and extremism are and why we need to be vigilant.
- All learners, apprentices, associates and employees will know that ATC Training has policies in place to keep them safe from harm and that ATC Training regularly reviews its systems to ensure they are appropriate and effective.

Radicalisation is defined as the act or process of making a person more radical or favouring of extreme or fundamental changes in political, economic or social conditions, institutions or habits of the mind.

Extremism is defined as the holding of extreme political or religious views. We are fully committed to safeguarding and promoting the welfare of all learners and employees. We recognise that safeguarding against radicalisation is no different from safeguarding against any other vulnerability.

All employees are expected to uphold and promote the fundamental principles of British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs.

Learners or employees with low aspirations may be more vulnerable to radicalisation and, therefore, we strive to equip our learners and employees with confidence, self-belief, respect and tolerance as well as setting high standards and expectations for themselves.

ATC Training employees, contractors, associates and volunteers will undertake appropriate training to ensure that they are clear about their role and the parameters of their responsibilities including their statutory safeguarding and prevent duties.

Safeguarding

ATC Training are committed to safeguarding and promoting the welfare of all learners including young people and vulnerable adults.

Employers also have a responsibility to the learners they employ. We also recognise that we have a duty to help employers, employees and learners to recognise their responsibilities, through guidance, support and training. As the employer of a learner, it is important that you understand your responsibilities to the learner and what safeguarding means to you. The following information should provide answers to some of the questions you may have. If they are not answered here, please get in touch with us using the contact details provided.

ATC Training is committed to ensuring that every young person or vulnerable adult who takes part in a learning activity, including careers awareness, an apprenticeship programme or any other training activities provided by the organisation should be able to do so in a safe and protected environment. We believe that all young people whatever their age, culture, ability, gender, language, racial origin, religious belief, sexual orientation, or disability have a right to protection from abuse.

The welfare of all young people and vulnerable adults is the paramount concern to the company. ATC Training recognise their collective and individual duty to safeguard and promote the welfare of young people and vulnerable adults and to take action to prevent or report any abuse discovered or suspected in the course of its activities.

Definition

Young Person

A child is legally defined as “any person who is under the age of 18 years”. In this document, a “young person” is in the upper age ranges of the official definition of a child. The term has no legal status – it acknowledges that people aged 16 or 17 may not think of themselves as “children”.

Vulnerable Adult

A vulnerable adult is defined as a person whom:

- Has needs for care and support (whether or not the local authority is meeting any of those needs) and;
- Is experiencing, or at risk of abuse or neglect; and
- As a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect

Safeguarding Strategy

In order to safeguard young people and vulnerable adults ATC Training will take a preventative approach to safeguarding young people and vulnerable adults from potential harm or damage.

- Employees and Associates will receive basic awareness training of their safeguarding responsibilities.
- A code of behaviour is available for those working closely with young people or vulnerable adults.
- ATC Training through its safety management will take all reasonable measures to ensure that risks of harm are minimised by appropriate:
 - Risk assessment and management of training suppliers
 - Health and Safety procedures
 - Staff selection, recruitment, induction, supervision, and training
 - Promotion of an open work culture “whistle-blowing”

Where young people are likely to be involved in an activity, such as apprenticeship recruitment and training; ATC Training will work with recognised companies and check the safeguarding policy and processes in place, as well as make them aware of ATC Training’s own related policies.

ATC Training will take advice and guidance from local authorities about safeguarding and divisional staff are encouraged to build local links or contacts for advice if such need occurs.

Designated Safeguarding and Prevent Contact

The companies designated safeguarding and prevent officer is:

Jane Cumiskey	safeguarding@atctraining.co.uk
---------------	--------------------------------

Types of Abuse

In order to safeguard young people and vulnerable adults ATC Training will take a preventative approach to safeguarding young people and vulnerable adults from potential harm or damage.

Physical abuse	Is defined as the use of physical force that may result in bodily injury, physical pain, or impairment. Physical abuse may include but is not limited to such acts of violence striking, hitting, beating, pushing, shoving, shaking, kicking, pinching and burning.
Emotional/psychological abuse	A person subjecting another to behaviour that may result in psychological trauma, including anxiety, chronic depression, or post-traumatic stress disorder.
Financial abuse	Tactic used by abusers to limit and restrict their victims access to their finances. For example, a young adult having their benefits taken away from them.
Neglect by others	Where a parent, carer or guardian will actively and knowingly fail to care for or attend to the basic needs of a child or vulnerable adult. For example, not feeding a child and/or leaving them in the same clothes and not helping them wash for days on end.
Self-neglect	Is any failure of an adult to take care of themselves? It could be a result of poor health, depression, cognitive problems or being physically unable to care for themselves. In this situation, family and carers would be expected to pick up on these signs and give or apply for appropriate care.
Discriminatory abuse	Is when you are picked out deliberately for unfair treatment because of a protected characteristic. For example, a vulnerable adult is picked on by an employer because of their disability.
Organisational abuse	Is where an institution fails to provide basic care for its residents. It is also related to gang culture where an individual is forced into committing crime for the financial gain of gang leaders.

Prevent

The Prevent duty is another aspect of safeguarding, which requires the Education sector to have "due regard to the need to prevent people from being drawn into terrorism, supporting terrorism or being drawn into non-violent extremism".

Purpose of Prevent

Prevent aims to safeguard vulnerable individuals (both adults and children) who may be at risk of potentially becoming involved in terrorist activities. It also aims to support institutions, such as schools, colleges and universities where this may happen.

All employees and associates have a responsibility to report any instances where they think they have identified a Safeguarding issue to the Safeguarding Officer.

The Prevent Strategy will:

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

Responsibilities

All provider employees have a legal responsibility under the Prevent Duty to make sure that:

- They have undertaken training in the Prevent Duty as identified by their management
- They are aware of when it is appropriate to refer concerns about learners to the Prevent officer, usually the provider's Safeguarding officer
- They exemplify British values of "democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs" into their practice

Extremism

The Government has defined extremism as "vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs". This also includes calls for the death of members of the British armed forces.

Terrorism

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 of 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.

CONTEST

CONTEST is the Government's Counter Terrorism Strategy. The aim of the strategy is 'to reduce the risk from international terrorism, so that people can go about their lives freely and with confidence.' CONTEST has four strands, often known as the four Ps. The aims of the 4 Ps are:

- PREVENT - to stop people becoming terrorists or supporting violent extremism
- PURSUE - to stop terrorist attacks through disruption, investigation and detection
- PREPARE - where an attack cannot be stopped, to mitigate its impact
- PROTECT - to strengthen against terrorist attack, including borders, utilities, transport infrastructure and crowded places

Radicalisation

People can be drawn into violence or they can be exposed to the messages of extremist groups by many means. The risk of radicalisation is the product of a number of factors and identifying this risk requires that employees exercise their professional judgement, seeking further advice as necessary. It may be combined with other vulnerabilities or may be the only risk identified. Potential indicators include:

- Use of inappropriate language
- Possession of violent extremist literature
- Behavioural changes
- The expression of extremist views
- Advocating violent actions and means
- Association with known extremists
- Seeking to recruit others to an extremist ideology

The Government has defined extremism as "vocal or active opposition to fundamental British Values", which include:

- Individual liberty
- Rule of law
- Democracy
- Mutual respect and tolerance of different faiths and beliefs.

This includes not discriminating against those with protected characteristics (Equality Act 2010), namely:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion and belief
- Sex
- Sexual orientation

Grooming

Grooming is a word to describe people befriending children and vulnerable adults to take advantage of them for sexual preferences. Grooming is also used by extremist groups to radicalise individuals in to supporting and potentially committing terrorist attacks.

Signs that a child is being groomed online:

- Wanting to spend more and more time on the internet
- Being secretive about who they are talking to online and what sites they visit
- Switching screens when you come near the computer
- Possessing items – electronic devices or phones – you haven't given them
- Using sexual language, you wouldn't expect them to know
- Becoming emotionally volatile

Signs that a child is being groomed in person:

- Groomers will hide their true intentions and may spend a long time gaining a child or vulnerable adults trust
- They may try to gain the trust of the whole family to allow them to be left alone with a child or vulnerable adult
- Groomers may deliberately try to work with children or vulnerable adults and gain the trust of their colleagues

Cyberbullying

Cyberbullying involves the use of electronic devices to bully people. These include: mobile phones, tablets, iPods, laptops and PCs. Social media platforms such as Facebook, Instagram, Twitter and WhatsApp are used by cyberbullies to put out their communications.

Those at risk include children using social media unsupervised and vulnerable adults are particularly at risk if they are using social media, as they may be more emotionally and mentally susceptible to the abuse.

Reporting for FGM

Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act 2003 (“the 2003 Act”). It is a form of child abuse and violence against women. FGM comprises all procedures involving partial or total removal of the external female genitalia for non-medical reasons.

The FGM mandatory reporting duty is a legal duty provided for in the FGM Act 2003 (as amended by the Serious Crime Act 2015). The legislation requires regulated health and social care professionals and teachers in England and Wales to make a report to the police where, in the course of their professional duties, they either:

- Are informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl’s physical or mental health or for purposes connected with labour or birth

If you think you are dealing with such a case, you are strongly advised to consult the designated safeguarding lead, as soon as practicable, and to keep a record of any decisions made. It is important to remember that the safety of the girl is the priority.

Throughout the process, you should ensure that you keep a comprehensive record of any discussions held and subsequent decisions made, in line with standard safeguarding practice. This will include the circumstances surrounding the initial identification or disclosure of FGM, details of any safeguarding actions which were taken, and when and how you reported the case to the police (including the case reference number). You should also ensure that your organisation’s designated safeguarding lead is kept updated as appropriate.

Safeguarding Code of Conduct

Introduction

This code is intended to protect young people where a relationship of trust exists between them and an adult who is supporting them. However, it should also ensure that those in a position of trust do not put themselves in a situation where allegations whether justified or unfounded, could be made. While those who work with young people may express regret at the need for a code of behaviour, it should be noted that its purpose is to promote the highest standards of care for young people and to protect staff and others from the potentially devastating consequences of false allegations. All staff are urged to consider how they can safeguard their own position in the light of this advice without giving up important personal principles of care and trust.

General

Staff should take care that their relationships with apprentices reflect the age and maturity of the learner. It will be particularly important to ensure that all aspects of demeanour, language and attitudes – however conveyed – do not give rise to misunderstandings, especially when dealing with young people.

Physical Contact

Physical contact may be misconstrued by an apprentice, parent or observer. Touching learners, including well-intentioned informal and formal gestures such as putting a hand on a shoulder or arm, can, if repeated regularly, lead to questions being raised.

Staff must not make gratuitous physical contact with learners and should avoid attributing “touching” to their teaching style as a way of relating to learners. There will be occasions when physical contact will be acceptable. In general, these will fall into one of two categories:

Action to prevent harm or injury to the learner or others:

If it is necessary to prevent a learner causing injury to him/herself or to others the use of minimum force and contact necessary to prevent harm or injury is acceptable and defensible. Such as incidents must always be reported.

Comforting a learner in distress:

There is no easy definition of what is accepted as much will depend on the circumstances, the extent and cause of the distress and the alternative means of providing comfort. Employees need to use their professional judgement and discretion in relation to these factors. Staff should consider how others might perceive the action, even if no one else is present, and ensure that it does not develop into unnecessary contact. Particular care must be taken in instances, which involve the same learner over a period of time.

There are other occasions when physical contact may be questioned even if innocent in intention. Employees should therefore ensure that their actions recognise the possibility of misinterpretation and are open to the scrutiny of colleagues. Individual professional judgements will be required about the level of physical contact with individual learners, which will take into account their age, circumstances and background.

Private Meetings and One to One Training

Private meetings, by their very nature, could provide opportunities for learners to make malicious allegations. Staff and others must therefore recognise this possibility and plan such meetings accordingly. It is advisable to avoid remote areas of the building and to ensure wherever possible the door is left open or visual contact with others is maintained. Where it is not possible to meet in the way described, another member of staff should be told of the meeting beforehand. Steps to prevent others from entering the room by the use of “Meeting in Progress” signs are especially likely to be open to misinterpretation. In some cases, it will be advisable for another adult to be present.

First Aid

The existence of any life threatening, or serious condition will determine the suitability and necessity of physical contact. In the absence of such justification staff who administers first aid should ensure that, wherever

possible, other learners or another staff member can be present if there is any doubt over the possibility of any physical contact being misconstrued. Staff are not authorised to administer medication prescribed or otherwise to learners.

Comments and Discussions with Learners

Employees must avoid comments to or about any employee which could be taken to have sexual overtones. It is equally unacceptable for Managers to encourage debate and discussion between groups of apprentices or other employees, which could be interpreted as having sexual overtone, which are not justified in the context of work.

Notwithstanding the advice given above it is recognised that, in order to discharge particular pastoral responsibilities, Managers may from time to time need to engage in conversation with learners which cover sensitive matters. Managers must use their professional judgement to ensure that they are not drawn into areas inappropriate to their duties or their relationship with the learners concerned. Managers must also use their discretion to ensure that, for example, any probing for details cannot be construed as unjustified intrusion.

In responding to individual learners' distress Managers will need to consider carefully whether they should offer advice, sympathy or counselling if a discussion enters a sensitive area or, alternatively, refer them to an agency that is better placed to offer appropriate advice.

Infatuations and Crushes

These unfortunately do develop and can involve apprentices and their mentors of both a heterosexual and homosexual basis. They need to be handled sensitively. Careless and insensitive reactions have been known to provoke false accusations. It is therefore in the interest of all parties to avoid adding to the learner's problems by encouraging the crush or making jokes about the situation. In such situations the advice of a senior colleague must be sought. Other members of staff have a part to play too, in alerting a colleague to the possibility of an infatuation in order that appropriate steps can be taken to minimise hurt and distress and the risk to the employee concerned.

After Hours Activities

Staff should take particular care when supervising learners in the less formal atmosphere of a residential setting or out of hour's activity e.g. an awards ceremony or evening presentation. The more relaxed relationships that may promote successful activities can be misinterpreted by young people. It is important to emphasise that the standards of professional conduct and behaviour expected of employees should be no different to that applies within the training environment.

Reporting Incidents

Employees should report any concerns they may have following any incident where s/he feels that his/her actions may have been misinterpreted. This report should be made to a senior manager as soon as possible after the incident and should include as an immediate follow-up the preparation of a written note of the incident, a copy of which should be given to the senior manager.

Personal and Written Communication

Email may be the agreed medium for submission of work, advice over aspects of training or other professional matters. Other than for this purpose, it will rarely be appropriate for staff to write personal notes or letters to individual learners.

Employees using email should be aware of the less formal style that can characterise this form of communication and should ensure that responses do not convey an inappropriate tone. In particular, a friendly and chatty style committed to email can easily be misconstrued by the recipient, as the "conversation" is effectively private to just two individuals, with all that this implies.

Version History

Version	Reason for publication/change	Date	Author
1.2	Update to formatting including addition of version history table. Updated Safeguarding contact.	15/05/2023	AC
1.3	Added review period in, general review, no amendments.	11/11/2024	AC
1.4	Annual review, no amendments.	09/10/2025	AC