

Safeguarding and Prevent Policy 2025 – 2026

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Purpose and Scope

The ITP is committed to promoting the welfare of all learners and staff and safeguarding them from any form of abuse or harm. For the purposes of this policy, our learners include all applicants and apprentices at all stages of their journey.

We will ensure that all staff and students are aware of this policy and share our commitment to ensuring the safety and wellbeing of our community. We aim to ensure that our staff are vigilant about safeguarding issues and work alongside agencies and professional bodies to keep both our learners and staff safe from harm.

The ITP is as a safe place for people to explore controversial issues and where our staff are trained to encourage and facilitate this. We are committed to advancing the fundamental British values of the rule of law, individual liberty, democracy and mutual respect and tolerance of those with different faiths and beliefs.

This policy applies to all members of staff, including permanent, temporary and support staff, board members, volunteers, members and subcontractors.

Objectives

The key objectives of this policy are:

- ▶ Prioritise the safety and well-being of learners, staff, and visitors by integrating safeguarding principles into all practices.
- ▶ Raise awareness among staff and learners about the risks associated with radicalisation and extremism.
- ▶ Ensure all staff and learners are familiar with the ITP's safeguarding policy and understand how its processes protect them from harm.
- ▶ Clearly outline staff responsibilities regarding safeguarding.
- ▶ Maintain relevant policies and practices to uphold a safe environment.
- ▶ Promote and integrate British Values into the culture and curriculum of the ITP.
- ▶ Provide staff with appropriate training and resources to recognise and respond to concerns related to radicalisation.
- ▶ Offer support to individuals at risk through access to advice, guidance, and safeguarding measures.
- ▶ Establish clear procedures for reporting and addressing safeguarding concerns.

Promoting this Policy

This policy will be introduced to all staff during their induction and reinforced at quarterly culture and refresh sessions. Any updates to the policy will be communicated promptly, and all staff will be required to acknowledge their understanding by signing and dating the document.

We will consult with key stakeholders during policy updates to ensure it remains comprehensive, relevant, and effective in protecting our staff and learners.

Our Commitments

We are committed to:

- ▶ Promoting the welfare and safeguarding of every learner.
- ▶ Ensuring that learners never experience any form of abuse, discrimination, harassment, or victimisation.
- ▶ Protecting learners from radicalisation and extremism.

- ▶ Providing apprenticeship inductions that raise awareness of our safeguarding commitment, the support services available at ITP, and the contact details of our dedicated safeguarding officer. Safeguarding understanding and safe working practices are reviewed regularly, with opportunities for learners to discuss any concerns.
- ▶ Assessing the need for DBS checks and carrying out the necessary procedures when required.
- ▶ Offering staff and volunteers regular updates and annual training on safeguarding and Prevent duties.
- ▶ Acknowledging that ignoring abuse is not an option; all staff must report any concerns regarding the wellbeing and safeguarding of learners as per this policy.
- ▶ Ensuring that employers are aware of and understand our safeguarding policies.
- ▶ Ensuring all employers have appropriate Health and Safety policies in place. Additional health and safety checks are conducted for younger learners (aged 16–18), including completion of a young person's induction assessment.
- ▶ Maintaining a safeguarding and Prevent action plan/risk register and regularly monitoring the impact of our actions.

In return, we expect the following from our staff, employers, and learners:

- ▶ Adherence to British Values.
- ▶ Zero tolerance for disrespect towards individuals.
- ▶ Celebration of diversity and promotion of inclusivity.
- ▶ Acceptance and openness to differences.

ITP SafeSpace is a dedicated initiative designed to ensure the safety, well-being, and protection of all learners within ITP. This initiative provides a comprehensive framework that brings together key principles of safeguarding, The Prevent Duty, Equality, Diversity and Inclusion, and health and safety. **ITP SafeSpace** aims to create an environment where students feel secure, supported, and empowered to raise any concerns, with a focus on providing the resources and protection they need throughout their learning journey. It applies to all staff, including managers, board members, volunteers, members, learners or anyone working for or on behalf of the ITP.

ITP SafeSpace includes comprehensive student support, training, and awareness of safeguarding practices. It promotes inclusivity and equality while providing clear and accessible channels for students to report concerns, either anonymously or openly. The initiative also involves partnerships with employers to ensure they understand and implement safeguarding practices, alongside monitoring and risk management to ensure a safe environment.

Definitions

Safeguarding

Safeguarding is the act of protecting people's health, wellbeing, and human rights, and ensuring they are not harmed, abused, or neglected. It is a collective responsibility to safeguard children, young people, and adults.

Safeguarding involves:

- ▶ Working together to prevent and stop abuse or neglect
- ▶ Promoting an adult's wellbeing
- ▶ Considering an adult's views, wishes, feelings, and beliefs

Some examples of safeguarding include but not limited to:

- ▶ Physical abuse
- ▶ Sexual abuse
- ▶ Domestic abuse

- Harassment and stalking
- Female genital mutilation
- Honour-based abuse
- Children witnessing domestic abuse
- Psychological abuse
- Financial or material abuse
- Modern slavery

Prevent

The Prevent Duty is part of the UK government's counter-terrorism strategy. It requires education providers and other public bodies to take steps to prevent people from being drawn into terrorism or extremist activities. This includes identifying individuals at risk and providing appropriate support, while promoting values such as tolerance, democracy, and respect for the rule of law.

Learner

Refers to all learners (internal or subcontractors) engaged with ITP through interviews, online learning, ITP-based study or in the workplace. While statutory safeguarding requirements may be specific to vulnerable groups, ITP safeguards and supports the wellbeing of all learners.

Radicalisation

The process by which a person comes to support terrorism and forms of extremism leading to terrorism. Learners may become susceptible to radicalisation through a range of social, personal and environmental factors. It is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. Potential indicators may 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

Extremism

Extremism is defined by the Government in the Prevent Strategy 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. The UK government new definition of extremism 2024 is, "Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance that aims to":

1. negate or destroy the fundamental rights and freedoms of others; or
2. undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights or
3. intentionally create a permissive environment for others to achieve the results in (1) or (2).

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 advancing a political, religious, or ideological cause.

The Prevent Duty

The **Prevent Duty** is part of the [UK Governments Counter-Terrorism strategy](#), and it requires educational providers to have "due regard to the need to prevent people from being drawn into terrorism."

The Prevent Strategy has three specific strategic objectives:

- ▶ 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.
- ▶ Work with sectors and institutions where there are risks of radicalisation that we need to address.

Prevent is about keeping our learners both safe and within the law. The Prevent Duty is not about preventing learners from having political and religious views, rather to support them to develop and discuss those views or act on them in non-extremist ways.

The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make learners vulnerable to future manipulation and exploitation.

The ITP is clear that this exploitation and radicalisation should be viewed as a Safeguarding concern and that protecting learners from the risk of radicalisation is part of our Safeguarding duty.

We are committed to building the resilience of our staff and students against extremist narratives by encouraging an open, inclusive, and supportive culture where challenging topics can be discussed and debated. Staff are provided with a variety of training and resources to enhance their awareness of such narratives and their counter-narratives, ensuring they are well-equipped to address and challenge harmful ideologies.

All staff, including contractors, associates, and volunteers, will undergo training on the **Prevent Duty** during their induction.

As part of our ongoing commitment to safeguarding, staff will:

- ▶ Ensure that British Values continue to underpin everything we do.
- ▶ Explicitly cover British Values during induction, where learners complete a relevant activity.
- ▶ Link British Values in sessions with learners.
- ▶ Complete training on radicalisation, extremism, and the **Prevent Duty**.
- ▶ Attend regular CPD (Continuing Professional Development) sessions that focus on safeguarding issues, including Prevent.
- ▶ Be provided with resources and information to help them recognise potential warning signs of radicalisation.

British Values

As part of the Prevent Duty, we fully support and promote the fundamental principles of British values, which include:

- ▶ **Democracy** – A culture built upon freedom and equality, where everyone is aware of their rights and responsibilities.
- ▶ **The rule of law** – The need for rules to make a happy, safe and secure environment to live and work.
- ▶ **Individual liberty** – Protection of your rights and the right of others you work with.
- ▶ **Respect and Tolerance** – Understanding that we all don't share the same beliefs and values. Respecting the values, ideas and beliefs of others whilst not imposing our own on others.

Fundamental British Values underpin what it is to be a citizen in a modern and diverse Great Britain valuing our community and celebrating diversity of the UK.

Fundamental British Values are not exclusive to being British and are shared by other democratic countries as a way of creating an orderly society, where individual members can feel safe, valued and can contribute for the good of themselves and others.

We are committed to embedding these values throughout our curriculum and learning environment. British values will be explicitly taught during the induction process for new staff and learners, and reinforced through various training modules, classroom discussions, and activities.

We will:

- ▶ Ensure British values are incorporated into the curriculum and daily practice.
- ▶ Provide learners with the opportunity to explore these values in depth, encouraging respect for diversity and understanding of different perspectives.
- ▶ Create a learning environment where every individual feels safe, respected, and valued.

Reporting Concerns of Radicalisation or Extremism

If you, as a staff member, learner, or visitor, have concerns about radicalisation or extremism, it is imperative to report these immediately to the **Designated Safeguarding Officer (DSO)** through the designated safeguarding reporting process.

If a learner has concerns about their own vulnerability, or if you suspect that a learner may be at risk of radicalisation, refer to **Appendix 4** and **Appendix 5** for guidance on escalating safeguarding concerns.

Appendix 2 and Appendix 3 gives examples to help you identify vulnerabilities and indicators that someone may be at risk of radicalisation.

NB – should you feel your learner, yourself or any members of the public are in immediate danger report to the police immediately.

Once the Designated Safeguarding team has been informed, they will decide on whether the issue needs to be escalated to the local police Prevent Officer. The Designated Safeguarding Officer that is involved with the referral will then support the Channel process as seen fit by the local Channel panel.

NB - Referral to the Channel process is a safeguarding measure, not a criminal intervention.

Displaying one or more vulnerabilities or indicators does not necessarily mean that a learner is at risk of radicalisation, but all concerns must be reported to the DSO for further evaluation. The referral

process involves assessing the **learner's level of engagement, intent, and capability**. If necessary, the DSO will consult with the local **Further Education (FE) Prevent Coordinator** for guidance.

If the **Police Prevent Team** determines that the threshold for intervention is not met, the case will be signposted to appropriate partner agencies for alternative safeguarding support or early intervention. It is important to recognise that radicalisation is influenced by various factors, and most learners do not engage in extremist activities. Interventions may address issues such as **mental health, relationship difficulties, or challenges related to substance misuse**. These interventions often focus on safeguarding the individual rather than solely addressing risks of radicalisation.

Always report your concerns to the Designated Safeguarding Officer, even if the indicators appear minor. Safeguarding processes ensure appropriate action is taken, whether related to radicalisation or other vulnerabilities.

Safeguarding

The ITP is committed to safeguarding and promoting the welfare of all our learners and staff including vulnerable individuals and young people.

Safeguarding an adult or young person at risk

An adult or young person at risk is defined as an individual who:

- ▶ Has support and/or care needs, and
- ▶ Is experiencing, or is at risk of, abuse or neglect, and
- ▶ Due to their support and/or care needs, is unable to protect themselves from the risk or experience of abuse or neglect.

Learners can disclose information about their circumstances during the application process, registration, and at any point during their studies.

If any staff member becomes aware of a safeguarding concern involving an adult at risk, they must report the concern to the Designated Safeguarding Officer (DSO) either directly, or by submitted a Safeguarding Disclosure Form. The DSO will assist with the next steps and ensure appropriate action is taken. The wishes of the individual who is at risk, or who reports being at risk, will be fully respected throughout the disclosure process.

With the learner's consent, external referrals can be made as appropriate. Any actions taken by ITP staff will be both suitable and proportionate. Employers also have a responsibility to safeguard any ITP learner they employ, and we are committed to supporting employers, staff, and learners to recognise and fulfil their responsibilities through guidance and training.

Reporting a safeguarding concern or incident

All safeguarding concerns and incidents relating to learners should be reported either by contacting the Designated Safeguarding Officer (DSO) directly, emailing safeguarding@theitp.org or completing the online [Safeguarding Disclosure Form](#) (Appendix 5).

A safeguarding incident is an incident that causes physical or mental harm, or risk of harm, to an individual or others.

If a student or member of staff is in immediate danger, actions should be taken to safeguard them from the risk of harm including calling emergency services or medical assistance where required.

If a student or member of staff is not in immediate danger but a criminal offence has occurred or is likely to occur, a DSO and police should be contacted.

Roles and Responsibilities

Designated Safeguarding Lead

The designated safeguarding lead is responsible for ensuring that:

- ▶ There are a sufficient number of trained and competent staff with designated responsibility for safeguarding.
- ▶ All staff have read and understood both the Keeping Children Safe in Education (DfE statutory guidance, effective from 1 September 2025) and this policy.
- ▶ All staff receive adequate training to identify potential safeguarding issues and to respond appropriately to disclosures.
- ▶ Policies are maintained, and all other relevant information and material is effectively communicated to staff.
- ▶ Record keeping is accurate and secure.
- ▶ ITP operate safer recruitment procedures and ensure that appropriate checks are carried out on all new staff.

It is the role of the Designated Safeguarding Lead to:

- ▶ Act as a central point for all staff to discuss any safeguarding concerns.
- ▶ Maintain a confidential recording system for safeguarding and learner protection concerns.
- ▶ Liaise with other agencies and professionals in line with Working Together to Safeguard learners.
- ▶ Be available during working hours for staff in the company to discuss any safeguarding concerns.
- ▶ Ensure all staff access appropriate safeguarding training and relevant updates in line with the recommendations within Keeping Children Safe in Education.
- ▶ Ensure all staff, learners, parents/guardians/carers and employers are aware of the safeguarding team and their contact details.

Designated Safeguarding Officers

The Designated Safeguarding Officers are responsible for ensuring that in the absence of the Designated Safeguarding Lead, they act as Designated Safeguarding Lead.

Members of Staff

All members of staff are provided with a copy of the 'Keeping Children Safe in Education (DfE statutory guidance, effective from 1 September 2025)' which covers safeguarding information and have received appropriate training relevant to their role within the organisation as part of their induction and ongoing updates. Staff training is designed to ensure all staff can:

- ▶ Recognise potential safeguarding and learner protection concerns involving learners.
- ▶ Respond appropriately to safeguarding issues and take action in line with this policy.
- ▶ Record concerns in line with ITP's policies.
- ▶ Refer concerns to the Designated Safeguarding Lead and be able to seek support external to ITP if required.

All members of staff have a responsibility to:

- ▶ Provide a safe environment in which learners can learn.
- ▶ Ensure all learners are able to develop appropriate strategies to recognise and respond to risk and build resilience.
- ▶ Identify and recognise learners who may be in need of extra help, who are suffering, or are likely to suffer significant harm.
- ▶ Provide help for learners, where appropriate and reasonable.

- ▶ Take appropriate action to prevent safeguarding concerns escalating arising.
- ▶ Safeguard learners' wellbeing and maintain public trust in teaching profession as part of their professional duties.
- ▶ Maintain an attitude of 'it could happen here' where safeguarding is concerned and to always act in the best interests of the learner.
- ▶ Respond to and refer any concerns about learners, in accordance with this policy.
- ▶ Contribute to, where appropriate, read and adhere to the company's policies and procedures.

Learners

ITP Ensures that all learners:

- ▶ Complete all safeguarding modules via including British Values, radicalisation and extremism awareness, sexual harassment and staying safe online.
- ▶ Are supported to read and adhere to ITP's Safeguarding and Prevent policy and procedures.
- ▶ Are encouraged to 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.
- ▶ Are provided with regular updates and refresher training throughout their learning journey to reinforce their understanding around safeguarding.

Safe Working Practice

At ITP, all staff are required to adhere to clear guidelines on Safe Working Practice.

Learners may make allegations against staff if they feel vulnerable or perceive a potential risk to their welfare. Therefore, staff must be cautious not to place themselves in situations that could lead to allegations or jeopardise learner protection, ensuring they always maintain professional boundaries.

Staff members who have direct contact with learners must ensure that appropriate environments are maintained, such as being in public spaces or in view of others, whether in the workplace or elsewhere. Staff should remain particularly mindful of the professional risks associated with social media and electronic communication, including email, mobile phones, texting, and social media platforms.

Allegations against Members of Staff

ITP recognises that staff and sub-contractors may, at times, behave in ways that could cause harm to other staff members or learners, and we take any such allegations very seriously. Any allegations should be reported immediately to the Designated Safeguarding Lead (DSL), who will escalate the matter accordingly. If the allegations involve the Designated Safeguarding Lead, staff and learners are advised to report them to the CEO or the Chair of the Board.

All staff and sub-contractors should feel confident in raising concerns about poor or unsafe practices, and these concerns will always be treated seriously by the Designated Safeguarding Lead. All staff are made aware of ITP's whistleblowing procedure, and it is a disciplinary offence not to report concerns about a colleague's conduct that could place a learner at risk.

In line with Keeping Children Safe in Education (DfE statutory guidance, effective from 1 September 2025), ITP promotes a culture of openness and transparency where low-level concerns about staff behaviour are shared and addressed at the earliest opportunity. Low-level concerns may include behaviour that does not meet the threshold of harm but is inconsistent with the ITP's Code of Conduct or professional expectations. All low-level concerns will be recorded, reviewed, and managed

proportionately to help maintain a safe learning environment and to prevent concerns from escalating.

Allegations against Learners

ITP recognises that young people can sometimes 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. ITP is aware that factors such as gender, age, ability, and culture may influence the nature of such incidents. We firmly believe that abuse is abuse, and it will never be tolerated, dismissed, or minimised.

ITP recognises that child-on-child abuse, including sexual harassment and sexual violence, can occur both online and offline. Such behaviour is never acceptable and will not be tolerated. All incidents will be taken seriously and responded to in line with this policy and statutory safeguarding guidance, including Keeping Children Safe in Education (DfE statutory guidance, effective from 1 September 2025).

Learners who have experienced child-on-child abuse will receive support by:

- ▶ Offering them an immediate opportunity to discuss their experience with a staff member of their choice.
- ▶ Advising them to keep a record of concerns as evidence and discussing ways to respond to concerns and build resilience, where appropriate.
- ▶ Providing reassurance and ongoing support.
- ▶ Collaborating with local and national organisations to offer additional or specialist advice and guidance.

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

- ▶ Discussing the incident, understanding the specific concern, and addressing the need for behavioural change.
- ▶ Informing parents/guardians and employers, if appropriate, to assist in changing the attitude and behaviour of the learner.
- ▶ Offering appropriate education and support.
- ▶ Referring to the police or local services (such as early help or children's specialist services) as needed.

Safeguarding Learners with Special Educational Needs and Disabilities

ITP acknowledges that learners with an Education, Health and Care Plan (EHCP), special educational needs and disabilities (SEND) may face additional safeguarding challenges, as they could have a reduced ability to resist or avoid abuse. These learners may also have speech, language, and communication needs that make it difficult for them to express what is happening to them. We are committed to ensuring that learners with EHCP and SEND, especially those with communication difficulties, receive the support necessary to ensure their voices are heard and acted upon.

Staff members are encouraged to be mindful that learners with EHCP and SEND can be disproportionately affected by safeguarding concerns such as bullying. All staff will be trained to recognise potential indicators of abuse, such as changes in behaviour or mood, and injuries. It is important not to assume that these signs are solely related to the learner's disability. We also acknowledge that learners with EHCP and SEND may not always outwardly show the typical indicators of abuse.

ITP understands the critical importance of mental health and well-being for all learners. We aim to:

- ▶ Treat mental health and well-being with the utmost seriousness and compassion.

- ▶ Promote mental health and well-being through awareness, training, and resources for learners, staff, and employers.
- ▶ Collaborate across the organisation to safeguard those at risk of poor mental health.
- ▶ Proactively identify issues and work towards resolving them.

Disclosure

At ITP, when a staff member receives an allegation or disclosure from a learner, they must immediately document the conversation in writing and submit a Safeguarding Disclosure Form: <https://forms.office.com/Pages/ResponsePage.aspx?id=J-CpuxoPq0qwStsAJEFsIRqtJ0Xe1hPsr9LjnRSkTRUNKRMWlgzVFdVSFIUS05LTIdROTIJUjBXVy4u>.

Staff should exercise caution during any disclosure and avoid influencing the outcome, particularly by the way they speak to or question the learner. ITP's priority is to ensure that investigations are carried out fairly and impartially. While investigations are ongoing, the learner will continue to be welcomed at ITP, though they may choose to withdraw from learning activities if they wish.

The 5 R's

Everyone has a responsibility to actively make the learning environment safe and secure for all by following the 5 R's:

- ▶ **Recognise** – All staff have a responsibility to recognise abuse or neglect in the course of their everyday work. Sometimes, the signs are obvious such as broken bones or cuts and bruises. However, sometimes the signs are a lot less easy to identify. All staff have a role in recognising possible abuse, investigating and acting.
- ▶ **Respond** - All employees working with learners need to be alert to signs of abuse or neglect and know how to respond appropriately (including knowing who in their organisation to share their concerns with and where appropriate, knowing how to ask relevant non-leading questions to see if there is a reasonable and consistent explanation for the signs observed. It may be necessary to call 999 for emergency services.
- ▶ **Report** - Any issues or concerns, allegations or suspicions relating to Safeguarding must be taken seriously and reported to the Safeguarding Designated Officer or Designated Safeguarding Lead using the [Safeguarding Disclosure Form](#).
- ▶ **Recording** – Accurate and detailed notes on the situation must be taken. It is important that you do not interpret or give opinion on the situation as this may bias the information provided and jeopardise any further investigation.
- ▶ **Refer** – The DSO will decide on the appropriate action and if necessary, or appropriate, make a referral to an outside organisation.

In deciding whether to refer or not, the DSO should take into account:

- ▶ The individual's wishes and preferred outcome
- ▶ Whether the individual has the mental capacity to make an informed decision about their own and others' safety
- ▶ The safety or wellbeing of children or other adults with care and support needs
- ▶ Whether there is a person in a position of trust involved
- ▶ Whether a crime has been committed

This should inform the decision whether to notify the concern to the following people:

- ▶ The police if a crime has been committed and/or
- ▶ Local adult social services for possible safeguarding enquiry
- ▶ Relevant regulatory bodies such as Ofsted
- ▶ Service commissioning teams

- Family/relatives as appropriate (seek advice from adult social services)

The DSO should keep a record of the reasons for referring to the concern or reasons for not referring.

Online Safety

As part of our safeguarding duties, ITP recognises that online education and safety are critical components of protecting both young people and adults. The use of technology presents challenges and risks to learners and staff both inside and outside of the training environment. It is essential that apprentices and staff are aware of how to protect themselves online and ensure the security of their personal data.

The dangers associated with permissive online environments can include exposure to radicalising influences, bullying and abuse, revenge porn, grooming, identity theft, and viruses. These risks can be broadly categorised into three key areas of concern:

1. **Content:** Exposure to illegal, inappropriate, or harmful material.
2. **Contact:** Harmful online interactions with other users, such as grooming or bullying.
3. **Conduct:** Personal online behaviour that increases the likelihood of, or causes harm, such as sharing personal information or engaging in unsafe activities.

ITP is committed to ensuring that all learners and staff are informed of safe practices when using the internet. We encourage vigilance and prompt reporting of any harmful content. By fostering awareness and understanding of these risks, we aim to protect everyone within the ITP community from online harm. **ITP ensures appropriate filtering and monitoring measures are in place across digital systems and learning platforms to protect learners from harmful content.**

Confidentiality and Information Sharing

ITP recognises that a strong working relationship between staff and learners is built on trust. However, when it comes to safeguarding concerns, it is important to be clear about the limits of confidentiality. While confidentiality is essential, staff should never offer absolute guarantees, especially when dealing with serious safeguarding issues that require immediate escalation or pose a potential threat to life. If a learner or staff member discloses information, it is crucial to explain the boundaries of confidentiality and the necessity of sharing certain information to safeguard the individual involved. It is often easier to clarify that staff have a responsibility to report specific concerns than to later break a confidence.

ITP supports working in partnership with learners, their families, and carers. This means seeking clear, explicit, and informed consent from individuals before sharing information with other people or agencies, in line with the best interests of the individual. However, there are circumstances where sharing confidential information without consent is justified in the public interest. These situations include:

- When there is evidence that a learner is suffering or is at risk of suffering significant harm.
- When there is reasonable cause to believe that a learner may be at risk of significant harm.
- To prevent significant harm to a learner or others, including through the prevention, detection, and prosecution of serious crime.

When sharing information, ITP adheres to the Seven Golden Rules to ensure best practice:

- **Rule 1:** Data Protection Laws are not a barrier to sharing information
- **Rule 2:** Be Open and Transparent

- ▶ **Rule 3:** Seek advice when unsure
- ▶ **Rule 4:** Share with consent when possible and where appropriate (there may be some circumstances where seeking consent including parental consent is not required)
- ▶ **Rule 5:** Balance safety and privacy
- ▶ **Rule 6:** Ensure that information sharing is appropriate and secure.
- ▶ **Rule 7:** Document the sharing process and rationale

The Designated Safeguarding Lead (DSL) will only disclose information about a learner to other staff members on a need-to-know basis. While staff have a duty to maintain confidentiality, they also have a professional responsibility to share relevant information with external agencies when it is necessary to safeguard a learner. Confidentiality concerns should never stand in the way of taking the necessary steps to protect the learner's safety and well-being. The primary goal is always to act in the best interests of the learner.

Staff safety

At ITP, we are committed to maintaining the safety and well-being of both staff and learners by ensuring professional boundaries are respected at all times. Staff are expected to adhere to the following guidelines:

- ▶ Do not befriend learners on social media platforms.
- ▶ Do not share personal contact information, such as phone numbers, with learners.
- ▶ Avoid conducting home visits or transporting learners unless prior approval has been obtained.
- ▶ Refrain from developing personal relationships with learners outside of the professional context.

When interacting with learners, staff should also keep the following in mind:

- ▶ Building rapport with learners is encouraged as part of a positive learning experience; however, maintaining professional boundaries is essential to creating a safe, respectful environment.
- ▶ Never promise to keep disclosures confidential, especially when a learner shares concerning information. ITP's commitment to safeguarding means following the appropriate reporting procedures to protect the learner.
- ▶ Avoid being alone with learners in private or isolated spaces for extended periods of time where the interaction cannot be easily observed.
- ▶ Provide advice based on facts and available resources rather than offering personal opinions. Where appropriate, refer learners to external services or support channels.
- ▶ If you ever feel unsafe or uncertain in your interactions with a learner, remove yourself from the situation and inform your line manager and a Designated Safeguarding Officer (DSO).

ITP understands that handling sensitive disclosures can be distressing. If a staff member feels impacted by a disclosure, they are encouraged to access support through ITP's well-being resources or HR. ITP maintains an open-door policy for staff to discuss any concerns. However, staff must understand that ITP cannot offer absolute confidentiality for disclosures, particularly when it involves safeguarding concerns. All disclosures must be reported in line with ITP's safeguarding procedures to ensure the ongoing safety and protection of learners.

Safer recruitment

At ITP, we are committed to safeguarding our learners through a robust safer recruitment process. All staff and volunteers working with learners undergo the appropriate DBS checks in line with the Education Skills Act 2008.

We conduct two types of checks:

- ▶ **Standard DBS Check:** Covers spent and unspent convictions, cautions, reprimands, and final warnings.
- ▶ **Enhanced DBS Check:** Includes the standard check plus relevant additional information from local police.

Any concerns raised from DBS checks are reviewed by HR, and a full risk assessment is conducted when necessary. These measures help ensure that only suitable individuals are employed to work with our learners.

Appendix

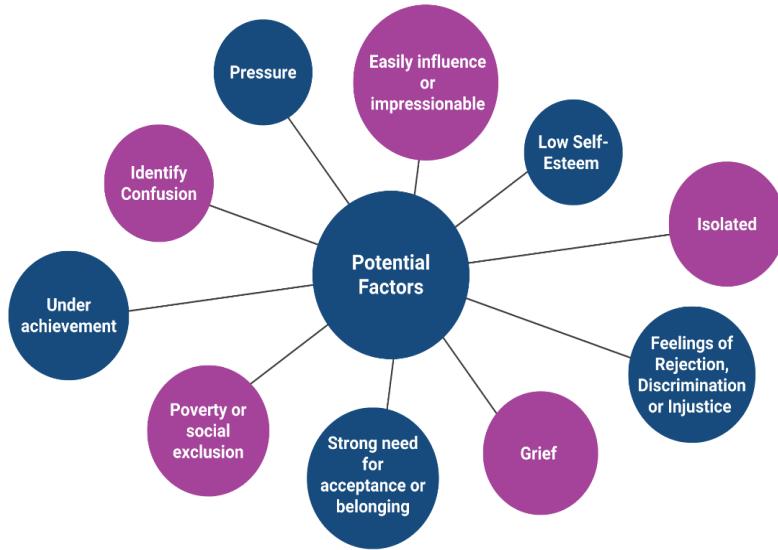
1. Safeguarding Acts, Guidance & Legislations

1.	The Children Act 1989 – Amended 2004 (England and Wales)
2.	The Children (Northern Ireland) Order 1995
3.	The Children (Scotland) Act 1995
4.	Working Together to Safeguard Children 2023
5.	Working Together under the Children Act 2004 – Health in Wales
6.	National Guidance for Child Protection – Scotland 2023
7.	The Protection of Vulnerable Groups (Scotland) Act 2007
8.	Protection of Freedoms Act 2012
9.	The Care Act 2014
10.	Channel and Prevent Multi-Agency 2023
11.	Prevent Duty Guidance England and Wales 2023
12.	The Terrorism Act 2000 (NI)
13.	Counter Terrorism and Security Act 2015
14.	Modern Slavery Act 2015
15.	What to do if you are worried a child is being abused 2015
16.	Children Missing in Education 2024
17.	Multi-agency guidance on FGM 2020
18.	How to respond to an incident of sexting
19.	Child sexual exploitation: definition and a guide for practitioners, local leaders and decision makers 2017
20.	Disqualification under the Children Act 2006 (2018)
21.	Information sharing: advice for practitioners providing Safeguarding services 2024
22.	General Data Protection Act 2018
23.	Keeping children safe in Education (effective from 1 September 2025)
24.	Education and Training (Welfare of Children) Act 2021 (which amends the Education Act 2002)
25.	Online Safety Bill 2023

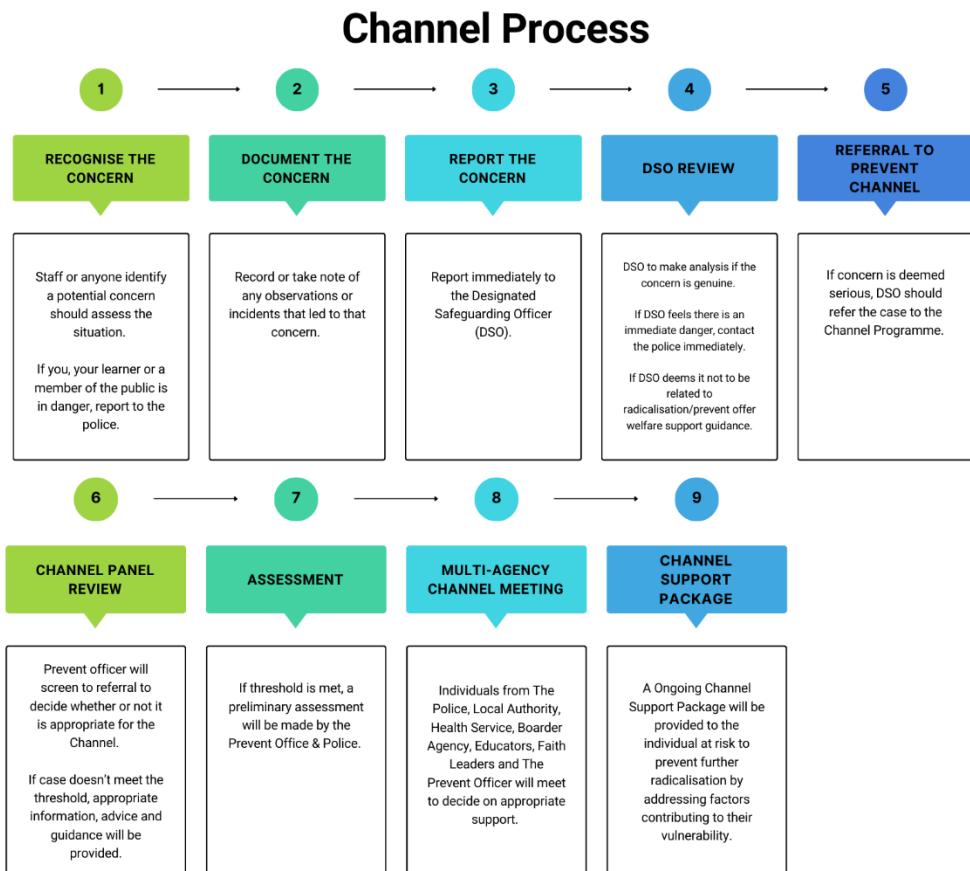
2. Susceptibility & Indicators of Radicalisation

Susceptibility	Indicators
Feelings of Isolation	Changes in behaviour: Sudden or extreme shifts in attitudes, beliefs or behaviours.
Identity Crisis	Isolation or Withdrawal
Seeking a sense of belonging, purpose or importance	Increased Social Media Activity
Bullied	Drastic changes in personal appearance, dress or lifestyle choices that correlate with an extremist ideology e.g. wearing specific symbols, clothing, or accessories associated with extremist groups.
Media Influence	Adopting a "Them vs. Us" Mentality such as a strong division between groups of people, often accompanied by feelings of hatred or mistrust towards certain groups based on religion, ethnicity or political beliefs.
Seeking revenge	Justifying or rationalising acts of violence, terrorism or extreme measures to achieve ideological goals.

3. Factors of Susceptibility



4. Channel Process



5. Safeguarding Disclosure Form

itp apprenticeships

Safeguarding Disclosure Form

This form is designed to collect information regarding any safeguarding or Prevent related concerns. Please fill out much of this form as possible as this will help us assess the level of risk and determine the most appropriate course of action to address the situation effectively and appropriately.

1. Name of person making the report *

2. Date of Disclosure *

3. Role of person submitting the report i.e. Learner, Coach, Employer etc. *

4. Details of the individual at risk *
Include any persons involved, please provide as much information as possible such as their name, gender, age, ethnicity, religion, contact details etc.

5. What is your relationship to the individual involved in this disclosure? *

6. Date of Incident/Concern

7. Do those involve know you're making this disclosure? *
 Yes
 No
 Unsure

8. Please select type of concern from the list below. *
Select all that apply.
 Significant Harm
 Physical Abuse
 Sexual Abuse
 Emotional Abuse
 Neglect
 Bullying and Harassment
 Cyber Bullying / E-Safety
 Domestic Violence
 Prevent / At Risk of Radicalisation
 Mental Health
 Other

9. Please provide detail on the issue/concern *

This content is neither created nor endorsed by Microsoft. The data you submit will be sent to the form owner.

Microsoft Forms

6. External Support and Referral Contacts

Local Authority Safeguarding Teams – Depending on where the person is based, you can find their local authority contact details through the Gov website <https://www.gov.uk/find-local-council>.

Current apprentices relevant contacts:

Apprentice Address	Local Authority	Child Safeguarding Contact	Adult Safeguarding Contact	Regional Prevent Education Coordinator (RPEC)
Morpeth, NE65	Northumberland County Council	Onecall Phone: 01670 536400 Email: onecall@northumberland.gov.uk	Onecall Phone: 01670 536400 Email: onecall@northumberland.gov.uk	Chris Sybenga Email: Chris.Sybenga@education.gov.uk
Manchester M41	Trafford Council	Children's First Response Phone: 0161 912 5125 Email: firstresponse@trafford.gov.uk	Adult Protection Line Phone: 0161 912 5135 Email: AdultSafeguardingHub@trafford.gov.uk	Claire Little Email: Claire.little@education.gov.uk
Weston-Super-Mare BS23	North Somerset Council	Children's Front Door Phone: 01275 888808 Email: childrens.frontdoor@north-somerset.gov.uk	Care Connect Phone: 01275 888801 Email: care.connect@north-somerset.gov.uk	Cheri Fayers Email: cheri.fayers@education.gov.uk
Milton Keynes MK10	Milton Keynes City Council	Multi-Agency Safeguarding Hub (MASH)	Safeguarding Adults Team Phone: 01908 252835 Email:	Helene Morris

Apprentice Address	Local Authority	Child Safeguarding Contact	Adult Safeguarding Contact	Regional Prevent Education Coordinator (RPEC)
		Phone: 01908 253169 / 253170 Email: children@milton-keynes.gov.uk	safeguardingadults@milton-keynes.gov.uk	Email: Helene.morris@education.gov.uk

- ▶ Prevent Coordinators – Contact your regional Prevent Education Officer via the following link: <https://forms.office.com/Pages/ResponsePage.aspx?id=yXfS-grGoU218704s0qC-Qovq5-NtvxCgNLhSQJKrbIURVVLMEFKWTQ5WTBIWURQVVkwNE5VSE80TC4u>
- ▶ NSPCC Helpline – 0808 800 5000
- ▶ Police (non – emergency) – 101
- ▶ Emergency - 999

Policy Review

This policy will be reviewed annually and updated in response to changes in legislation, statutory guidance, or safeguarding best practice, including Keeping Children Safe in Education.

Signed and Approved By	Charlotte Goodwill
Job Title	Chief Executive Officer
Signature	
Date Signed	22/01/2026

Document Management

Owner: Lauren Holloway – Designated Safeguarding Lead

Last Review Date: 22/01/2026

Next Review Date: 22/01/2027

Version Control

Version	Date	Change
Version 1	07/12/2024	New document
Version 2	21/05/2025	Appendix 6 added and references to EFSA replaced with DfE.
Version 3	22/01/2026	References to KCSIE 2024 replaced with Keeping Children Safe in Education (DfE statutory guidance, effective from 1 September 2025)