

## Safeguarding and Prevent - Apprenticeships policy statement

### Leadership roles with designated responsibility for Safeguarding

- a) Designated Safeguarding Lead (Director of Student Life and Wellbeing)
- b) Deputy Designated Safeguarding Lead (Head of Student Support)
- c) University Secretary Governance and Assurance Office (Head of Prevent Duty Operations)
- d) Local Safeguarding Officer for Apprenticeships (Deputy Head of Apprenticeships)

Safeguarding mailbox: [safeguarding@york.ac.uk](mailto:safeguarding@york.ac.uk)

[Report and Support](#)

### 1. General principles

The purpose of this policy statement is to ensure that all apprenticeship learners are protected through the awareness and preventative and reactive action of **all** University of York (“the University”) staff who assist in the teaching, support and guidance of apprenticeship learners.

The University takes seriously its responsibility to safeguard and promote the welfare of our apprenticeship learners; and to work together with all University representatives and external agencies to promote a multi-agency approach to safeguarding.

At the University of York we understand that any of our apprentices may experience outcomes or barriers to their learning which may be a cause for concern. We ensure that University staff who have responsibility for teaching, supporting or interacting with apprentices undergo relevant levels of scrutiny. These will include pre-recruitment checks and assessment for good character for all those employed by the University. In addition, particular staff will receive training to effectively recognise behaviours, signs and symptoms of being at risk of harm and will act appropriately and in the interest of the learners (Category 1 and 2). To include, where appropriate, referral and further support from wider and external agencies. Areas for concern may include:

- a) Absence - missing work or not turning up at University
- b) Changes in appearance
- c) Changes in behaviour and character - becoming quiet or loud, aggressive or withdrawn.
- d) Changes in emotional health - crying, anxiety or low mood
- e) Excessive alcohol consumption
- f) Physical injuries - cuts or bruises
- g) Poor living conditions

- h) Self harm
- i) Use of drugs
- j) Withdrawing from certain activities - reluctance to go online, sudden changes in use and/or abuse of technology

## 2. Legislation and recommendations

This policy covers the legislative requirements and recommendations pertaining to the protection of children, young people and adults at risk in the UK, in accordance with statutory guidance on safeguarding and promoting the welfare of learners in education. The University recognises the duties for the safeguarding of adults which apply where learners are:

- a) At risk of abuse and/or neglect
- b) Unable to protect themselves
- c) Are in receipt of care and /or support

In addition the statutory duties under the Prevent agenda.

An adult at risk is someone aged 18 years or over who is, or may be,

- a) In need of community care services by reason of health or other disability, age or illness; and who is or may be unable to take care of themselves, or unable to protect themselves against significant harm or exploitation

While the University is not subject to the provisions of the Care Act 2014, the University draws broadly on this act to inform its policy on safeguarding Adults at Risk.

This policy has been created in line with:

- a) **The Children Acts, 1989**, provides the legal framework for the protection of people under 18 in the UK, specifically sections 17 & 47
- b) Statutory guidance on making arrangements to safeguarding and promote the welfare of people under 18 in the UK under section 11 of the **Children Act, 2004**
- c) Statutory guidance on **Keeping children safe - in schools and colleges, 2023**
- d) Section 93 of the **Education and Inspections Act, 1996**, guidance on the use of reasonable force.
- e) Section 26 of the **Equality Act, 2010**
- f) **Working together to safeguard children 2018**
- g) **The care act 2014**
- h) **The social services and wellbeing act 2014**
- i) 'Working together to safeguard children'
- j) 'Positive environments where children can flourish'
- k) 'Prevent duty' guidance
- l) [DfE - Prevent Duty Guidance - Briefing Note Higher Education final](#)
- m) [Ofsted Inspecting safeguarding in early years, education and skills settings](#)

### 3. Scope of the policy

The University of York:

- a) Believes that **all** University staff have a collective and individual duty to provide a caring, positive, safe and supportive environment that positively promotes the health and wellbeing of each individual learner along with their social, physical and moral development.
- b) Recognises that **all** University staff have a responsibility to protect our apprenticeship learners from harm whilst ensuring a consistent learner-centred approach to assessing and supporting, based on a clear understanding of learners' individual needs.
- c) Believes that all learners have a right to be treated with dignity and respect.
- d) Believes that all learners have a right to be protected from harm and human rights violation.

This policy statement applies to all University staff who are responsible for teaching, supporting or interacting with apprentices, and is aligned to the [University of York Safeguarding Policy and Procedure](#) and its supporting documentation.

### 4. What is safeguarding? University of York Safeguarding Policy and Procedure

Safeguarding at the University is defined as the protection of learners from harm and the promotion of their health, welfare and human rights. Safeguarding comprises four main aims:

- a) Protection from maltreatment or significant harm
- b) Preventing impairment of health or development
- c) Ensuring all learners have the opportunity to experience circumstances consistent of safe and effective care
- d) Taking action to enable people to achieve the best outcomes

Safeguarding can be further described as:

**Care Quality Commission 2022** *“protecting people's health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect. It's fundamental to high-quality health and social care.”*

**Working Together to Safeguard Children, 2018** defines maltreatment as;  
*‘...Inflicting harm or failing to prevent harm’*

**The Children Act, 1989, 2004** defines harm as;  
*‘ill-treatment or the impairment of health or development’*

Significant can be defined as;  
*‘Compared to the health and development of another with that which could be reasonably expected of a similar person (child, young person, adult or learner)’*

The University understands that there are numerous recognised barriers to learning and categories of significant harm or maltreatment which a learner may experience, such as:

- a) forced marriage
- b) physical abuse
- c) sexual abuse
- d) emotional abuse
- e) neglect and self-harm
- f) domestic violence
- g) harassment and bullying (incl on-line)
- h) financial abuse
- i) institutional abuse
- j) discriminatory abuse
- k) child-on-child, towards child and peer-on-peer abuse
- l) radicalisation and extremism
- m) Involvement in county lines and cuckooing

## 5. County Lines

County lines are organised crime groups who use phone lines to move and supply drugs from cities to small rural communities. They focus on the exploitation of vulnerable people, and those who are at risk of harm. Sometimes a group will occupy a person's home, known as 'cuckooing'.

The University:

- a) Adopts an inclusive approach to safeguarding. We understand the importance of recognising the signs and symptoms of potential maltreatment or significant harm and how to report and refer a concern.
- b) Formally record safeguarding concerns through a central system, then diverted for response and action to the relevant departmental areas.
- c) Recognises that a learner who is abused, experiences bullying or is witness to violence may feel alone, frightened and confused. We understand our responsibility to provide a stable, positive, facilitative, encouraging and safe environment.
- d) Accepts that experiencing harm may significantly or subtly affect the behaviour of a learner, ranging from what is perceived to be normal to aggressive or withdrawn. E.g An indication of concern could range from absence to being missing from education.
- e) Take a proportionate and age appropriate approach to safeguarding.
- f) Assess whether learners are 'at risk from harm' and take reasonable steps to keep learners who are vulnerable safe. University of York Safeguarding Policy and Procedure\_Jan2023
- g) Meet their statutory duties under the Prevent agenda.
- h) Review complaints received by the organisation for safeguarding themes.
- i) Liaises with local and regional authorities and national crime agencies.

Additional information on safeguarding and detailed definitions of the above categories can be found in the [University of York Safeguarding Policy and Procedure](#).

## 6. Low Level Concerns

A low-level concern is where the behaviour of an adult does not meet the threshold for referral. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’. Where low-level concerns are repeated and persistent, this may trigger a referral.

All apprentices are risk rated, and this is reviewed during the Tripartite reviews. In addition, monthly concern meetings, where attendance from programme level safeguarding representation and the Safeguarding lead are present, take place.

At these meetings items are noted within a tracker, risks are reviewed, and feedback provided to employers for areas of focus and progress made.

Referral for further safeguarding support or advice can be taken at this point. Referrals would be recorded on the central and departmental safeguarding logs.

Where the conduct of a staff member working in, or on behalf of, the University is a cause for concern these can be reported using the link below.

[Report + Support - University of York](#)

## 7. Prevent

Following statutory guidance issued under Section 29 of the Counter-terrorism and Security Act 2015, a duty is placed upon the University of York (University) in exercising our undertakings to have ‘due regard to the need to prevent people (staff, students and visitors of the University) from being drawn into terrorism’.

In complying with the Prevent Duty, the University aims to demonstrate an awareness and understanding of the risk of radicalisation within the institution. This risk may vary greatly and can change rapidly, but no area within the institution is entirely risk free.

This is set out in the University’s [Prevent Policy](#) and [Prevent Approach Summary Document](#), and operationalised through the associated [Prevent Duty Oversight Group](#) and [Apprenticeship Good Practice for the Prevent Duty Checklist](#).

‘The Prevent Duty Oversight Group brings together senior staff, student union representatives and external contacts in the Prevent arena in order to coordinate implementation of the Prevent Duty at the University of York within a comprehensive and robust framework, with reference to both

staff and students. The Group's work sits within the wider UK CONTEST strategy and its four workstreams: Prevent, Pursue, Protect and Prepare.

The Group contributes towards promoting awareness of the Prevent Duty and associated policies and procedures across the institution. Members play an active role in developing and contributing items for consideration, and following up agreed actions as relevant'.

All apprentices and most staff (Category 1 and 2) will complete mandatory training on Prevent.

## 8. 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 the Equality Act 2010.

British values are described as:

- a) Democracy
- b) The rule of law
- c) Individual liberty
- d) Mutual respect and tolerance for those with different faiths and beliefs, and no faith/belief.

All apprentices will complete induction training aligned with the Prevent guidance. In addition, Apprentices will be encouraged to explore British Values as part of their apprenticeship programme, these are embedded and reconsolidated through application of learning in a contextualised manner, within their programme of study.

## 9. The University's responsibilities

The University will:

- a) Support the development of every apprentice and employees in ways which will foster security, confidence and independence.
- b) Provide an environment in which apprentices feel safe, valued and treated with dignity and respect.
- c) Through effective training, implement preventative safeguarding measures to help raise awareness of safeguarding and Prevent to protect learners from risk of maltreatment or harm.
- d) Ensure that employers are aware of their safeguarding obligations, through guidance and training.
- e) Maintain open channels of communication with each employer. Learners may act very differently depending on their environment and may feel more comfortable discussing sensitive issues with different people.
- f) Ensure that safe pre-recruitment measures of shortlisted candidates are implemented for staff working in regulated activity with learners, specifically those under 18.
- g) Employ designated members of staff responsible for raising awareness of safeguarding and Prevent, providing specialist support to staff, learners and

- clients when necessary.
- h) Support all staff affected by their experiences of safeguarding concerns and protect learners by encouraging staff to share concerns using the confidential [safeguarding@york.ac.uk](mailto:safeguarding@york.ac.uk) email address or by contacting the Lead Safeguarding Officer.
  - i) Protect learners from serious harm both off and on line by ensuring clear roles and responsibilities for the filtering and monitoring of on-line information and materials.
  - j) Respond to allegations of incidents of a Safeguarding and/or Prevent nature between learners, both on and outside the University premises.
  - k) Facilitate an open, transparent and positive culture around Safeguarding and Prevent, seeking expert and external advice where needed.
  - l) Adopt an institutional mindset, where all are responsible for safeguarding, and an attitude of 'it could happen here'.

## 10. University staff responsibility

All University staff have a duty to:

- a) Understand and fulfil their safeguarding responsibilities as outlined in this policy statement, the [University of York Safeguarding Policy and Procedure](#), and any supporting documents.
- b) Ensure that all learner data is kept confidential in line with the University's Contract for Services and Data Protection Policy.
- c) Report and record any safeguarding concerns or disclosures **immediately** to the Designated/Lead Safeguarding Officer, using the email: [safeguarding@york.ac.uk](mailto:safeguarding@york.ac.uk) in line with the University's reporting concerns procedure and supporting guidance.
- d) Maintain strict confidentiality with learners in line with this policy and guidance from the Lead Safeguarding Officer.
- e) Engage in safeguarding and Prevent training and complete safeguarding assessments and qualifications as identified as required (Category 1 and 2).
- f) Take age-appropriate and proportionate action on the basis that the welfare of the learner is of paramount concern and, if in doubt, to **immediately** seek advice from the Lead Safeguarding Officer and encourage learners to 'speak out'.
- g) Respond to concerns about learners who are absent or missing from education.
- h) Engage and complete provided training to enable them to respond effectively to safeguarding incidents or concerns.
- i) Remain vigilant and professionally curious, maintaining a 'it could happen here attitude'.
- j) Be reflective of their own practice.

## 11. Designated Lead Safeguarding Officer, Deputy Safeguarding Officer, Lead Liaison Officer, and Prevent Lead.

The responsibilities of the Lead Safeguarding Officers, Lead Liaison Officer and Prevent Lead include:

- a) Providing support and advice to staff who share a concern or disclosure about a learner and maintaining appropriate records of concerns, incidents or disclosures on a secure central risk register.
- b) Immediately investigating significant concerns and referring to the local Safeguarding Children's Board or Adult Safeguarding Board when necessary.
- c) Oversight of the creation and maintenance of a secure, confidential, single central file to record staff DBS certificate details, safe recruitment details, emergency contact information and learner data for apprenticeship programmes.
- d) Oversight of the delivery, review and completion of the University's staff training in safeguarding and Prevent. In addition, for those leading Prevent, to enable them to support and train other staff, completion of training that focuses on extremist and terrorist ideologies.
- e) Oversight and delivery of the Prevent management procedure and risk self-assessment.
- f) Ensuring that all non-confidential documentation relating to the University's Apprenticeship Safeguarding Policy and procedures is made available to all University staff, learners and employers and the safeguarding referral procedure is made available to every learner-facing University faculty.

## **12. Visiting Speakers and ad-hoc Staffing (Category 3)**

To enrich the curriculum and ensure that apprentices are developing the knowledge, skills and behaviour required for their intended programmes, on occasions apprentices will receive guidance, tuition and support from staff and external speakers who are outside of their core delivery team. On those occasions, core programme staff will be required to complete the [Apprenticeships guest speaker risk assessment form](#), and adhere to the [Apprenticeships Guest Speaker Code of Conduct](#).

Those individuals will have been recommended by professional members of the core apprenticeship team and will not have undergone the pre-recruitment checks, enhanced disclosure and barring service clearance, or undertaken the Prevent and Safeguarding training.

Key criteria meet category 3 includes:

- a) Non-regular contact with the apprentices.
- b) Recorded content for delivery.
- c) Group engagement with apprentices.
- d) No access to confidential information.

Category 3 staffing would include staff who were part of the wider support system at the University, who could be contacted independently and autonomously by apprentices. E.g Library and IT support staff.



Category 3 staffing will have a risk assessment in place, and where possible will be chaperoned by a member of the core apprenticeship programme team at all times during their interaction with the apprentices.

Please note that where it is felt that the contact or subject may be sensitive for identified vulnerable adults, this will be reported within the risk assessment and the apprentice will be provided with permission to not attend.

### **13. On-line Safety**

As part of the safeguarding of young people and adults, on-line education and safety forms part of the safeguarding duties. It is critical that apprentices and staff are aware of the ways that people can protect themselves on-line and ensure the security of their personal data. Dangers through permissive environments can include exposure to unmitigated student exposure to radicalising influences, bullying and abuse, revenge porn, grooming, identity theft, and viruses.

An important part of an apprentice's development at university is becoming a critical thinker. Developing this critical mindset will also help apprentices to examine and appraise the validity and authenticity of information online.

Within the expectation of being a learner at the University are the conditions around the accessing of on-line materials. Some programmes will additionally embed this within their expectations around behaviour in line with professional conduct.

At York, [Regulation 11](#) outlines the University's aim to facilitate the flow of information, while protecting the confidentiality, availability and integrity of information and complying with legal and contractual requirements. This acts as the overarching policy for use of IT systems at the University and applies to students and staff equally. Under the regulation, accessing or distributing offensive, obscene, indecent or defamatory material is prohibited (except where this constitutes a research or study conducted with prior written Ethics approval). It also establishes adherence with the Government's Prevent Strategy and outlines the Universities approach to technical controls and monitoring and further links to the [IT Investigations and Data Access Policy](#).

As a research-intensive academic institution and the home of adult students, the University does very limited internet filtering, and attempts to block the IWF (Internet Watch Foundation) and CTIRU (Counter-Terrorism Internet Referral Unit) lists, phishing and malware only.

The University also takes its own Information Security obligations seriously, with Staff receiving mandatory ongoing training in Cyber Security and Data Protection. Published privacy

notices set out how the University processes the personal data of various stakeholder groups including students, staff, alumni and higher and degree apprentices.

#### **14. Confidentiality**

The University recognises that all matters relating to safeguarding will only be shared with individuals who need to be made aware of the situation to appropriately discharge the University's responsibilities and duty of care.

All University staff must be aware that they have a responsibility to immediately disclose information which, if not shared, may compromise a learner's safety or welfare. All University staff will be fully supported by the Lead Safeguarding Officer.

University staff must always endeavour to share our intention to report a concern or refer to the safeguarding referral procedure, with parents/carers of young learners and the learner themselves in all cases unless to do so would put the learner at greater risk of harm.

As part of the apprentices delivery and reconsolidation of the knowledge and understanding is formed in the workplace, through the Tripartite reviews concerns and issues that have arisen under the categories as identified within this document, will be formally recorded and reported through the programme level concern log meetings.

These feed into the employer reports which are issued centrally and part of the tracking and monitoring of concerns.

## Document History

Issue Date	Author	Summary of Changes	Date of next review
September 2023	Sarah Reynolds-Golding	Revised and updated in line with statutory guidance (KCSIE 2023), Ofsted EIF updates (Sept 23), addition of categories of staffing and Prevent duty guidance updates (Sept 23)	September 2024
January 2024	Emma Parker	Section 2 (Legislation and recommendations) updated, addition of link to Ofsted Inspecting safeguarding in early years document.	September 2024
February 2024	Sarah Reynolds-Golding	Updates to changes to internal staff structure and Designated Safeguarding Lead role.	September 2024

## Document and External Links

[Working together to safeguard children \(gov.uk\)](https://www.gov.uk)

[Positive environments where children can flourish \(gov.uk\)](https://www.gov.uk)

[Prevent duty guidance: England and Wales \(2023\) \(gov.uk\)](https://www.gov.uk)

[Prevent duty guidance update: a briefing for Higher Education providers \(HEPs\) \(educateagainsthate.com\)](https://educateagainsthate.com)

[Ofsted Inspecting safeguarding in early years, education and skills settings \(theeducationpeople.org\)](https://theeducationpeople.org)

[University of York Safeguarding Policy and Procedure](#)

[University of York Prevent Duty Policy and Procedures](#)

[University of York Prevent Approach Summary Document](#)

[University of York Prevent Duty Oversight Group](#)

[University of York Apprenticeship Good Practice for the Prevent Duty Checklist](#)

[University of York Apprenticeships guest speaker risk assessment form](#)

[University of York Apprenticeships Guest Speaker Code of Conduct](#)

[University of York IT Investigations and Data Access Policy](#)

## Appendix 1

### Categories of Staffing and Expectation under Safeguarding.

Category	Remit of Role	Expectations	Rationale
Category 1	Core Apprenticeship Leaders, Managers	Enhanced DBS clearance.	Access to confidential information.

	and Delivery Teams.	Safeguarding, Prevent and County Lines Training.  SCR	Repeated and extended engagement with apprenticeships.  Safeguarding duties.
Category 2	Departmental Apprenticeship support and administration staff.	Safeguarding, Prevent and County Lines Training	Access to confidential information.  Repeated engagement with apprentices.
Category 3	Guest Speakers, industry experts and wider University staffing.	Risk assessment for guest speakers.  Agreement/adherence to Code of Conduct.  Chaperone (where appropriate)	Non-regular contact with the apprentices.  Recorded content for delivery.  Group engagement with apprentices.  No access to confidential information.