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11/01/22_V3	Katie Fowler, Lisa Entwistle, Chris Currie	Contents page, designated safeguarding lead and phone number, removal of local contacts and insertion of national guidance contacts for safeguarding and prevent, insertion of reference to Teams guidance, changes to flowchart.

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# Safeguarding Policy

## ***Purpose***

To show how The Apprentice and Training Partnership (“The ATP”) ensures that Safeguarding and Prevent are effectively understood and deployed within the company in order to ensure the protection and benefit to those which these statutes are there to serve.

## **Safeguarding legislation and guidance**

- Counterterrorism and Security Act 2015
- Keeping Children Safe in Education (2018)
- Working Together to Safeguard Children (2018)
- Children Act 1989 and Children Act 2004
- Education Act 2011
- What to do if you are worried a child is being abused (March 2015)
- Keeping children safe in education: Statutory guidance for schools and The ATP (September 2018)
- Guidance for safer working practice those working with children and young people in education settings (Safer Recruitment Consortium May 2019)
- The Police Act 1997 (Criminal Records) (Amendment) Regulations 2013 OR The Police Act 1997 (Enhanced Criminal Record Certificates) (Protection of Vulnerable Adults) Regulations 2002
- Safeguarding Vulnerable Groups Act 2006
- Care Act 2014
- Revised Prevent Duty Guidance: for England and Wales (Home Office July 2015)
- Modern Slavery Act (2015)

## ***Scope***

This policy applies to all of those charged by The ATP with the responsibility to interact with apprentices including paid employees, volunteers, service users and service providers.

Groups that must be safeguarded include children (those aged under 16), young persons (those aged 16 to 18) and vulnerable adults (those aged over 18 who by reason of mental or other disability, age or illness are or may be unable to take care of themselves or are or may be unable to protect themselves against significant harm or exploitation).

All those under the charge of The ATP must be committed to the safeguarding duty of/for every person we serve. Your obligations include understanding the definitions and following the procedures set out in Safeguarding along with maintaining safeguarding CPD and certifications as set out in the company CPD handbook.

Failure to undertake your duties set out in this policy will result in disciplinary as set out in your Employee Handbook.

## ***Definitions***

### **What is safeguarding?**

In the UK, safeguarding means protecting peoples' health, wellbeing, and human rights, and enabling them to live free from harm, abuse, and neglect.

Further definitions relating to safeguarding are provided below.

## ***Policy Authority***

The safeguarding and prevent policies have been implemented by The ATP Board of Directors.

Responsibility for the implementation of this policy is with the Designated Safeguarding Lead [DSL] and in their absence the Deputy Designated Safeguarding Lead.

Designated Safeguarding Lead: Lisa Entwistle  
Date: November 2021

Deputy Designated Safeguarding Lead: Chris Currie  
Date: June 2019

## ***Related Policies***

The safeguarding and Prevent policies should be read in conjunction with the following policies:

- Equality Opportunities & Diversity Policy
- Health & Safety Policy
- Data Protection Policy
- Data Retention Policy
- Data Privacy Policy
- CPD Policy
- Safer Recruitment Policy

This policy does not cover:

- Sexual harassment in the workplace – this is dealt with under The ATPs Disciplinary and Grievance policy located in the employee handbook

## ***Implementation***

Below are definitions and the process that must be adhered to in order to identify a safeguarding concern and to respond appropriately.

## **What is abuse in the following groups and how do you recognize it?**

### **Children:**

Abuse and neglect are forms of maltreatment of a child. A person may abuse or neglect a child by inflicting harm or by failing to act to prevent harm

Types of abuse can include:

- *Physical-* this may include hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating, or otherwise causing physical harm to a child. This can also include fabricating or inducing illness in a child
- *Emotional abuse-* may involve conveying to a child that they are worthless or unloved, or valued only in that they meet the needs of another person; age developmentally inappropriate expectations being imposed on children (possibly including interactions beyond the child's capability,

overprotection and limiting the child's exploration and learning, preventing the child participating in normal social interaction); the child hearing or seeing the ill-treatment of another; serious bullying

- *Sexual abuse*- can include forcing or enticing a child or young person to take part in sexual activities, whether the child is aware or not. This can include penetrative sex or non-penetrative and may include non-contact such as involving children looking at or participating in sexual images
- *Neglect*- the persistent failure to meet a child's basic physical and/or psychological needs. This may include maternal substance abuse during pregnancy. When born it can include a parent failing to provide adequate food, clothing, or shelter; failing to protect the child from physical abuse or harm; failing to ensure adequate supervision; failing to ensuring access to medical care

There are more details on recognizing child abuse on:

[Safeguarding children and child protection | NSPCC Learning](#)

***Please also refer to the national safeguarding referral sheet in the Policies & Procedures section of the ATP Hub.***

### **Adults:**

The Department of Health in 'No Secrets' has defined abuse as:

***"a violation of an individual's human and civil rights by any other person or persons"***

There is a consensus on the main forms of abuse, and these are:

- *Physical abuse*- this may include a person being: hit, punched, kicked, slapped, pushed, thrown, pinched, shaken, strangled, or suffocated; hit or beaten with an object; stabbed, burnt, or scalded. It may also include inappropriate restraint, abuse of medication, deprivation or use or misuse of physical aids and adaptations, neglect of personal care, food, drink, and warmth.
- *Sexual abuse*- this may involve forced or coerced involvement in sexual activity, unwanted physical contact such as rape (heterosexual, gay or lesbian); kissing or unwanted touching, being coerced into activity such as masturbating the perpetrator or carrying out sexual acts for which others pay the perpetrator
- *Non- contact sexual abuse*- can include being forced to be photographed or videos, to allow others to look at their body; to look at photographs or DVDs; being sexually harassed verbally or through sending of unwanted gifts
- *Psychological abuse*- may include intimidation or threats; humiliation; racial, sexual, or homophobic abuse; harassment, coercion, and extortion; being isolated from people other than abuser and other sources of information; being made to say or do things in ways prescribed by the abuser; being deprived of sleep; being kept exhausted or debilitated; having one's sense of reality distorted by misinformation, lies or misuse of medication. It can also include denying choice; deprivation or privacy; lack of access to activities; an abusive institutional regime
- *Financial abuse*- may include theft of money or property; use of money or property without consent; misuse of money intended, or belonging to an adult by someone trusted to handle their finances
- *Neglect and acts of omission* - may include failure to provide the elements necessary for life and to avoid harm; to treat carelessly; to pass by without notice; to fail to give care
- *Discriminatory abuse* - may include harassment; slurs; treatment, which is based negatively upon a person's gender, race, disability, faith, culture, or sexual orientation

- Institutional abuse - may include isolated incidents of poor or unprofessional practice through to pervasive ill treatment or gross misconduct at the other end of the spectrum

*Please also refer to the national safeguarding referral sheet in the Policies & Procedures section of the ATP Hub.*

## Taking Action

**It is the responsibility of staff to report and record their concerns as soon as possible.**

**We actively encourage a ‘never do nothing’ attitude if staff have a concern about an apprentice and promote discussion with DSL if in any doubt.**

**It is not their responsibility to investigate or decide whether an apprentice has been abused.**

Key points for staff to remember for taking action are:

- If an emergency takes the action necessary to help the apprentice, for example, call 999
- **REPORT your concern to the DSL as soon as possible and certainly by the end of the day**
- Do not start your own investigation
- Share information on a need-to-know basis only – do not discuss the issue unnecessarily with colleagues, friends, or family
- Seek support for yourself if you are distressed

## If a learner discloses to you

It takes a lot of courage for anyone to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual; their abuser may have threatened what will happen if they tell; they may have lost all trust in others; or they may believe, or have been told, that the abuse is their own fault.

If an apprentice talks to a member of staff about any risks to their safety or wellbeing, **the staff member will need to let the apprentice know that they must pass the information on** – staff are not allowed to keep secrets. The point at which they tell the apprentice this is a matter for professional judgement. If they jump in immediately the apprentice may think that they do not want to listen, if left until the very end of the conversation, the apprentice may feel that they have been misled into revealing more than they would have otherwise.

During their conversations with the apprentices, it is best practice for staff to:

- Allow apprentices to speak freely
- Remain calm and not overreact – the apprentice may stop talking if they feel they are upsetting their listener
- Give reassuring nods or words of comfort – ‘I want to help’, ‘This isn’t your fault’, ‘You are doing the right thing in talking to me’
- Not be afraid of silences, and allow space and time for apprentice to continue, staff will recognise the barriers the apprentice may have had to overcome to disclose
- Clarifying or repeating back to check what they have heard if needed but will not lead the discussion in any way and will not ask direct or leading questions – such as... whether it happens to siblings too, or what does the apprentice’s mother think about it

- Use questions such as Tell me.....? Is there anything else?
- At an appropriate time tell the apprentice that to help them, the member of staff must pass the information on
- Not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused.
- Remember professional boundaries and not share personal experiences such as 'that happened to me'
- Avoid admonishing the child for not disclosing earlier. Saying things such as 'I do wish you had told me about this when it started' or 'I can't believe what I'm hearing' may be the staff member's way of being supportive but may be interpreted by the child to mean that they have done something wrong
- Tell the apprentice what will happen next. The apprentice may agree to go with you to see the Designated Safeguarding Lead. Otherwise let them know that you will be consulting them.
- Write up their conversation as soon as possible on the record of concern form and hand it to the designated lead
- Seek support if they feel distressed

**Please refer to "Safeguarding Flow Chart" for information for referral.**

## **Records and Monitoring**

### **Recording and sharing information**

Information relating to concerns about the welfare of children or vulnerable adults, should be disclosed as soon as possible after the event, situation, or disclosure.

Information passed to children's or adult services must ensure a clear distinction between fact, opinion and hearsay and must include the following:

- The nature of the concern/allegation
- Details of the child or vulnerable adult, any alleged perpetrator, any witnesses
- A description of any visible injuries i.e., bruising
- An account of anything you have been told, stating who told you. If a child or vulnerable adult tells you their account of what has happened, do not question this, but record it as accurately as possible
- Any times, dates, places

### **Sharing information about adults**

Responsible information sharing plays a key role in enabling services to protect victims of adult abuse and, in extreme cases, can save lives.

As a matter of good practice, you should routinely consider getting explicit consent, but if this is not possible and other vulnerable adults are at risk it may be necessary to over-ride this requirement.

You should not give assurances of absolute confidentiality, where there are concerns about abuse. In circumstances, where abuse is a criminal act or it places other vulnerable people at risk, the information must be disclosed.

## **Allegations against ATP Staff**

If an allegation is made against a member of The ATP staff.

The following action will be taken:



1. The ATP staff member will cease all contact with the person making the allegation
2. The safeguarding officer will interview:
  - a. The person making the allegation; this will be done with a senior member of The ATP present and a member of the employer chosen by the person making the allegation to act in support of them and to act as a witness to the meeting
  - b. The ATP member of staff who the allegation has been made against; this will be conducted with a senior member of The ATP present as support for The ATP member and to act as a witness to the meeting.

*The purpose of the meeting is to establish whether there are grounds for the allegation, and if further action should be taken.*

3. The details of the allegation will be passed to the senior management team who will determine how the matter should be progressed. This may include suspending the staff member from duty until the allegation(s) have been fully investigated.
4. A judgement will then be made based on the findings of the full investigation, and dependent upon the judgement of the matter it may be reported to LADO [Local Authority Designated Officer] as required by law.

## Good practice guidelines and staff code of conduct

The following code of practice applies to all ATP staff (*including freelance and contracted*) working with children, young people, or vulnerable adults, whether acting in a paid or unpaid capacity:

## Good practice guidelines for online teaching and staff code of conduct

The ATP delivers all teaching and learning online, through MS Teams (or other secure platforms). The following good practice guidelines must be followed for online safeguarding.

- Only use ATP approved platforms for communication with apprentices (MS Teams, Zoom, Email, Text Message). Should you need to use an unapproved platform this must be approved by the designated safeguarding lead.
- Ensure all training and mentoring sessions with apprentices are booked through outlook, with access links available.
- Ensure apprentices line managers are always included in the diary invitation as required for 12 weeks review
- Ensure all training and mentoring sessions are recorded for quality, training, and safeguarding purposes.
- Always check in with the apprentice at the start and end of the session so they can raise any safeguarding concerns and for ATP staff to proactively support apprentices.
  - Example Qs:
    - Do you feel safe?
    - Do you feel well?
    - How are you coping?
    - How is your working environment?
    - How is everything at work?
- Ensure apprentices are following appropriate online learning guidance; microphones are on, video cameras are on, in a quiet, private location.
- Monitor apprentice's online behaviour. E.g., should an apprentice's online behaviour change. (Camera off instead of on etc), then ensure you check in with the apprentice on their wellbeing.
- Conduct all training and mentoring sessions using corporate background and remove personal items from view.
- Be positioned away from partners, children and pets or identifying landmarks (if possible, be alone in the room).
- Dress appropriately, using appropriate body language and vocabulary. Avoid wearing stripes and heavy patterns.
- Do not eat or drink during sessions, except for water/ soft drinks.
- Check if students need comfort breaks in longer teaching sessions.

## General good practice guidelines and staff code of conduct

- Do not have physical contact with apprentices.
- Do not take an apprentice alone in a vehicle.
- Unless circumstances make it impossible to comply, do not take an apprentice to the toilet unless either (a) another adult is present or (b) another adult is aware (this may include a parent or group leader).
- If you find you are in a situation where you are alone with an apprentice, wherever practicable make sure that others can clearly observe you.
- If alone with a single apprentice, the staff member must ensure that their face can be seen from the door via a window or open door.

- Only have professional relationships with an apprentice.
- Do not make suggestive or inappropriate remarks to an apprentice, even as fun, as this could be misinterpreted.
- If an apprentice accuses a learner or member of staff of abuse or inappropriate behaviour, you should report this immediately to the safeguarding officer.
- The duty to report applies equally to complaints or accusations of historic, and not just recent, abuse/inappropriate behaviour.
- If you are the recipient of any complaint or accusation from an apprentice, it is important to listen without making or implying any judgement as to the truth of the complaint or accusation.
- All complaints and accusations must be recorded and reported in line with safeguarding policy.
- If an apprentice makes a complaint, or if there are other reasons for suspecting abuse, you should not attempt to investigate this yourself, but should report your concerns to the designated safeguarding officer appointed under The ATP's policy ("*the policy*") on the safeguarding of apprentices.
- Stay current with safeguarding knowledge to support you in your work with apprentices. Regular safeguarding training will be provided.
- All staff must stay current and be aware of potential signs of radicalization and report instances of extremist behaviors to the DSO.
- Remember that abusers can be of any age, gender, ethnic background, or class, and it is important not to allow personal preconceptions about people to prevent appropriate action taking place.
- Good practice includes valuing and respecting apprentices as individuals, and the professional modelling of appropriate conduct – which would exclude bullying, aggressive behavior, and discrimination in any form.
- Those dealing with any allegations of abuse or misconduct should adhere to the principles set out in the policy. Any information received should be acted upon sensitively, effectively, and efficiently. Wherever possible, those making allegations should be given information about the outcome.
- Although allegations should be reported only on a "need to know" basis, staff and learners making allegations need not be concerned that they will be breaching confidentiality or the Data Protection Act, as complying with the policy overrides such obligations. If the person making the allegation feels they need counselling or other appropriate support from the ATP, they are encouraged to seek it.
- Ensure that you comply with appropriate licensing laws.
- All staff are expected to comply with the 2014, Professional Standards for Teachers and Trainers in Further Education.
- [https://www.et-foundation.co.uk/wp-content/uploads/2014/05/ETF\\_Professional\\_Standards\\_Digital\\_FINAL.pdf](https://www.et-foundation.co.uk/wp-content/uploads/2014/05/ETF_Professional_Standards_Digital_FINAL.pdf)

## **Safeguarding training**

Please refer to CPD policy and procedure for further information regarding mandatory safeguarding training.

It is important that all staff have regular training to enable them to recognise the possible signs of abuse and neglect and to know what to do if they have a concern. All staff, including support staff and the Directors, will be regularly trained in safeguarding.

The DSL will receive training updated at least every two years, including training in inter-agency procedures. They will be supported and encouraged to attend additional training to keep up to date, including forums and multi-agency training offered.

All training will be recorded and monitored to flag in advance when updates are required.

- All staff will be required to confirm their acceptance of the safeguarding and Prevent policies, code of practice and implementation.
- All staff must participate in mandatory safeguarding and Prevent training offered either in-house or externally to support ATP's work with children and vulnerable adults.
- All delivery staff are required to undertake safeguarding training (including Prevent)
- All IQA and management staff are required to undertake safeguarding (including Prevent) training to level 3 as a minimum

## **Safer Recruitment**

Please refer to the Safer Recruitment Policy for further information regarding safer recruitment practices.

The ATP endeavours to ensure that we do our utmost to employ 'safe' staff by following the guidance in Keeping Children Safe in Education (2016).

Recruitment, selection, and pre-employment vetting is carried out in accordance with Keeping Children Safe in Education 2016. Including.

- Verifying identity
- Basic DBS check
- Verification on mental and physical fitness
- Right to work in UK
- Professional qualifications

References will be sought before start of employment.

ATP will undertake DBS checks, request information of past convictions and pending cases and will obtain a minimum of one written reference on all new members of staff (employed), However two will be requested where a staff member has worked for more than two organisations. A second personal referee may be requested where there is only one professional reference available.

No member of staff shall have contact with ATP students before DBS and references have been returned and checked.

## PEOPLE TO CONTACT – ATP

*Please also refer to the national safeguarding referral sheet in the Policies & Procedures section of the ATP Hub for any specific details.*

[safeguarding@theatp.co.uk](mailto:safeguarding@theatp.co.uk) – for any advice and guidance or reporting directly of issues to safeguarding officer.

**1st Contact:** Designated Safeguarding Lead

**2<sup>nd</sup> Contact:** Deputy Safeguarding Lead

07944 779769 or 0330 380 0249

## ***Prevent Policy***

### ***Purpose***

To show how The Apprentice and Training Partnership (“The ATP”) ensures that safeguarding and prevent are effectively understood and deployed within the company in order to ensure the protection and benefit to those which these statutes are there to serve.

### ***Scope***

This policy applies to all of those charged by The ATP with the responsibility to interact with apprentices including paid employees, volunteers, service users and service providers.

The Prevent strategy must be deployed should The ATP encounter any apprentice who might be in danger of radicalization or who is demonstrating any extremist tendencies. Such individuals must be deemed as vulnerable and provided with appropriate support under the Prevent strategy or through Channel.

All those under the charge of The ATP must be committed to the Prevent duty of/for every person we serve. Your obligations include understanding the definitions and following the procedures set out in Prevent along with maintaining Prevent CPD and certifications as set out in the company CPD handbook.

Failure to undertake your duties set out in this policy will result in disciplinary as set out in your Employee Handbook.

### ***Key legislation***

The Prevent strategy has been developed as part of the Government’s Counterterrorism and Security Act 2015 (section 26) and has the following aims

- 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.

Other guidance information:

- Prevent Duty Guidance (2015)
- Counterterrorism and Security Act (2015)
- Revised Prevent Duty Guidance: for England and Wales (Home Office July 2015)

### ***Definitions***

Extremism is defined in the 2011 Prevent Strategy as vocal or active opposition to fundamental British values including: democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

British values are democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs.

## ***Policy Authority***

The safeguarding and Prevent policies have been implemented by The ATP Board of Directors.

Responsibility for the implementation of this policy is with the Designated Safeguarding Lead [DSL] and in their absence the Deputy Designated Safeguarding Lead.

Designated Safeguarding Lead: Lisa Entwistle  
Date: November 2021

Deputy Designated Safeguarding Lead: Chris Currie  
Date: June 2019

## ***Implementation***

Extremists of all persuasions aim to develop destructive relationships between different communities by promoting division, fear and mistrust of others based on ignorance or prejudice. Education is a powerful weapon against this, and we aim to equip our learners with the knowledge, skills and critical thinking to challenge and debate in an informed way. We must strive to ensure that The ATP is a safe place, where learners can explore controversial issues safely, and where our trainers, mentors and assessors encourage and facilitate this. We provide provision, delivered by skilled professionals, so that our learners understand and become tolerant of difference and diversity; and, to ensure that they thrive, feel valued and not marginalised.

The ATP will ensure that we promote tolerance and respect for all cultures, faiths, and lifestyles. The Board ensures that this ethos is reflected and implemented effectively in training policy and practice and that there are effective risk assessments in place to safeguard and promote apprentices' welfare. We have a duty to prepare our apprentices for life in modern Britain and to keep them safe.

The ATP promotes British values and holds members responsible for ensuring they are intrinsic in our approach to those we serve.

## **Signs of Vulnerability**

There are no known definitive indicators that a young person is vulnerable to radicalisation, but there are number of signs that together increase the risk.

Signs of vulnerability can include (and not limited to):

- Underachievement
- Being in possession of extremist literature
- Poverty
- Social exclusion or isolation
- Traumatic events
- Global or national events
- Religious conversion
- Change in behaviour

- Extremist influences
- Conflict with family over lifestyle
- Confused identify
- Victim or witness to race or hate crimes
- Rejection by peers, family, social groups, or faith
- Migration
- History of social care
- Perceptions and experience of discrimination
- Peer pressure, seduction of adventure
- Drug abuse

## Recognising Extremism

Early indicators of radicalisation or extremism may include:

- Showing sympathy for extremist causes
- Glorifying violence, especially to other faiths or cultures
- Making remarks or comments about being at extremist events or rallies outside school
- Evidence of possessing illegal or extremist literature
- Advocating messages similar to illegal organisations or other extremist groups
- Out of character changes in dress, behaviour, and peer relationships (but there are also very powerful narratives, programmes, and networks that young people can come across online so involvement with particular groups may not be apparent.)
- Secretive behaviour
- Online searches or sharing extremist messages or social profiles
- Intolerance of difference, including faith, culture, gender, race, or sexuality
- Graffiti, artwork or writing that displays extremist themes
- Attempts to impose extremist views or practices on others
- Verbalising anti-Western or anti-British views
- Advocating violence towards others

## Roles and Responsibilities

### Role of the Board:

It is the role of the Board to ensure that the training provider meets its statutory duties regarding preventing radicalisation.

### Role of Designated Safeguarding Lead:

it is the role of the designated safeguarding lead to:

- Ensure that staff understand the issues of radicalisation, can recognise the signs of vulnerability or radicalisation, and know how to refer their concerns
- Receive safeguarding concerns about children and young people who may be vulnerable to the risk of radicalisation or are showing signs of radicalisation
- Make referrals to appropriate agencies regarding concerns about radicalisation
- Liaise with partners, including the local authority and the police
- Report to the governing body on these matters

### Role of staff:

It is the role of staff to understand the issues of radicalisation, can recognise the signs of vulnerability or radicalisation and know how to refer their concerns.



## **Referral Process**

Staff at The ATP must refer all concerns about apprentices who show signs of vulnerability or radicalisation, these concerns must be passed to the Designated Safeguarding Lead as soon as possible using the appropriate referral method as set out in the policy. Staff are requested to follow procedures in Company's "Safeguarding Flow Chart", and take action.

When there are significant concerns about a learner, the Designated Safeguarding Officer will liaise with the appropriate authorities and provide up to date information to senior management and the Board. If you feel a child or a person is in immediate danger, call 999.

## **Monitoring and Review**

This policy will be monitored by the Board at least annually by receiving a report from the Designated Safeguarding Lead.

## **Prevent training**

Please refer to CPD policy and procedure for further information regarding mandatory safeguarding training.

Staff will be given training to help them understand the issues of radicalisation, are able to recognise the signs of vulnerability or radicalisation and know how to refer their concerns. This information also forms part of induction safeguarding training. Staff are updated as necessary in safeguarding briefings {if there are any current issues.}

All training will be recorded and monitored to flag in advance when updates are required.

- All staff will be required to confirm their acceptance of the safeguarding and Prevent policies, code of practice and implementation.
- All staff must participate in mandatory safeguarding and Prevent training offered either in-house or externally to support ATP's work with children and vulnerable adults.
- All delivery staff are required to undertake safeguarding training (including Prevent) to level 2 as a minimum
- All IQA and management staff are required to undertake safeguarding (including Prevent) training to level 3 as a minimum

## **Local Contact Details – Prevent**

*Please also refer to the national safeguarding referral sheet in the Policies & Procedures section of the ATP Hub.*

### **Reporting concerns about Terrorism**

- How to report your concerns about terrorism and individuals who may be at risk of radicalisation.
- If you are worried about anyone who is at risk of being radicalised by people who are involved in, or support, terrorism please contact;
- In an emergency, dial 999
- Anti-Terror Hotline - 0800 789 321
- **MIS** Freephone: 0800 111 4645  
Telephone: 020 7930 9000
  
- **PREVENT Officer(s)**
  - *Lisa Entwistle– Lead Safeguarding Officer – 0330 380 0249 - office hours*

*Out of hours – 07944 779 769*

If you consider anything to be suspicious or connected with terrorism, call 101

Alternatively, you can email us [safeguarding@theatp.co.uk](mailto:safeguarding@theatp.co.uk) email address to request advice and guidance.

If you suspect it, report it.

# IT Acceptable Usage Policy

## ***Purpose***

The Internet and web can be considered to be the greatest informational resource ever produced by mankind, but it can also be an un-regulated, un-governed environment which contains materials that would be considered to be illegal in the UK, plus content that is unsuitable for employees, learners, and visitors.

The ATP is committed to bringing the maximum benefits of ICT to its learners, and to equipping them with the knowledge, skills and attitudes that will enable them to thrive in the digital age.

ICT exists within the ATP for the primary purpose of supporting our role in providing apprenticeship training and assessment. ICT assists the company in discharging these functions and provides apprentices with an opportunity to become familiar with ICT. However, the ATP recognises that misuse of ICT by apprentices can occur. This can be by, for example,

- accessing or transmitting offensive or unacceptable material
- accessing or transmitting extremist or radicalising content

The purpose of the policy is to clearly state what is deemed to be acceptable use of The ATPs computing and ICT resources and supports the duty on the company to prevent people from being drawn into terrorism and/or extremism

## **Legislation and guidance**

Some of the UK legislation applicable to computer use is listed below. This is by no means an exhaustive list and users are reminded of their responsibility to be aware of their legal obligations.

- Equality Act 2010
- Obscene Publications Act 1959
- Protection of Children Act 1978
- Copyright, Designs, Patents Act 1988
- Computer Misuse Act 1990
- Criminal Justice and Public Order Act 1994
- Defamation Act 1996
- Data Protection Act 1998
- General Data Protection Regulations 2018
- Human Rights Act 1999
- Regulation of Investigatory Powers Act 2000
- Counter-Terrorism and Security Act 2015
- Keeping Children Safe in Education 2015
- Prevent Duty Guidance 2015
- Working Together to Safeguard Children 2015
- Children Acts 1989 and 2004
- Education Act 2002
- Safeguarding Vulnerable Groups Act 2006

## ***Scope***

All users of The ATP ICT facilities and in relation to IT facilities owned, leased, hired, or otherwise provided by the company, as well as those connected directly or remotely to the ATP's network or IT facilities.

It also covers any personal equipment used on our premises, or individuals connecting their own equipment to our network i.e. personal laptops connecting wirelessly to the internet. ICT facilities include all networks, computer systems and/or computing hardware and software made available by the company.

Failure to undertake duties applicable to staff set out in this policy will result in disciplinary as set out in your Employee Handbook.

A “User” is therefore either a member of ATP Staff, or, an ATP Student.

### ***Policy Authority***

The safeguarding and Prevent policies have been implemented by The ATP Board of Directors.

Responsibility for the implementation of this policy is with the Designated Safeguarding Lead [DSL] and in their absence the Designated Safeguarding Lead.

Designated Safeguarding Lead: Lisa Entwistle  
Date: November 2021

Deputy Designated Safeguarding Lead: Chris Currie  
Date: June 2019

### ***Implementation***

#### **Procedures**

#### **Authorisation and Access Control**

Based on the job role of staff members, a list of accounts and role based permissions are outlined.

Additional access must be authorised by the Board of Directors before being granted.

#### **Auditing and Privacy**

The company reserves the right to:

- Conduct checks on internet usage, user files stored on the shared drive, company owned or leased computers, and their usage, where such action is justified for the purposes of system administration, investigation of suspected breaches of the Acceptable Use Policy, to comply with Prevent Duty, or any other lawful purposes.
- Compress, archive, or delete files stored on computing and IT resources, such as shared drive, company cloud storage or the hard drives of company owned or leased computers, by existing or past users.
- Access, and, where necessary, to examine the content of user files held on any ATP computing and IT resources, private computers connected to the ATP network, or otherwise downloaded onto personal computers, discs, or separate drives for the purposes of investigating suspected breaches of the Acceptable Use Policy, or other lawful purposes.
- Monitor use of company Wi-Fi by any device including but not limited to computers, laptops, smart phones, tablets, notebooks for the purposes of investigating suspected breaches of the Acceptable Use Policy, or other lawful purposes including Prevent.
- Log and retain records of all electronic communications (web browsing activities, email exchange etc.) between users of company ICT and computing facilities and all external organisations for a period of no more than 18 months.

- monitor any and all aspects of its telephone and computer system that are made available to staff, apprentices, and visitors, and to monitor, intercept and/or record any communications including telephone, e-mail, or Internet communications.

## **Breaches to Policy**

The list below provides examples of potential ways in which a user may contravene this policy. This list is not exclusive or exhaustive and there may be other matters of a similar nature which would be considered as a breach of this policy. The consequences of the breach will depend on the level of severity:

- Playing computer games
- Sending nuisance (non-offensive) email
- Unauthorised access through the use of another user's credentials (username and password) or using a computer in an unauthorised area
- Assisting or encouraging unauthorised access
- Sending abusive, harassing, offensive or intimidating email
- Maligning, defaming, slandering, or libelling another person
- Misuse of software or software licence infringement
- Copyright infringement
- Interference with workstation or computer configuration
- Theft, vandalism or wilful damage of/to IT facilities, services, and resources
- Forging email. i.e. masquerading as another person
- Loading, viewing, storing, or distributing pornographic or other offensive material
- Unauthorised copying, storage, or distribution of software
- Any action, whilst using The ATP computing services and facilities deemed likely to bring the The ATP into disrepute
- Attempting unauthorised access to a remote system
- Attempting to jeopardise, damage circumvent or destroy IT systems security
- Attempting to modify, damage or destroy another authorised users data
- Disruption of network communication capability or integrity through denial of service attacks, port scanning, monitoring, packet spoofing or network flooding activities
- Attempting to use the company's ICT facilities, systems, and resources to draw people into acts of terrorism or extremism or promoting terrorism/extremism.

## **Security**

The ATP will endeavour to take reasonable care to ensure that users' data is safe and secure, however this is done in good faith, and no responsibility can be taken for any loss or damage howsoever caused. Facilities are provided "as-is" without any warranty or guarantee of suitability for any purpose, implied or otherwise.

The company requires all users to store and backup their own work.

## **Enforcement**

In the event of a known or suspected breach of policy, The ATP may take immediate action to ensure both the security and accessibility of its computing and ICT resources. Breaches of the Acceptable Use Policy will be dealt with according to their severity.

Incidents which are deemed to be in contravention of this policy will be assessed for their severity and as a result may lead to formal disciplinary action. In extreme circumstances the police may be called. Investigating such incidents may require the collection and evaluation of user related activity and evidence.

Employees: Action may consist of (but is not limited to) warnings; suspension or removal of user access to computing and ICT resources, including (but not limited to) services such as e-mail and/or Internet access; and suspension or termination of the user's account. Immediate action does not constitute any judgement of guilt, and appeals may be made.

Employees that identify a suspected breach of the Acceptable Use Policy is responsible for reporting the incident immediately to an ATP Director, and preserving any evidence.

For employees, upon receipt of a reported suspected breach of policy an investigation will be carried out, in confidence, and the findings will be considered in accordance with the company's Disciplinary Policy and Procedures.

## **Appeals**

All users are entitled to the right of appeal and any user wishing to appeal must write to then an ATP Director stating the basis for their appeal.

## **Usage**

### ***Laptops, computers, smart phones, tablets, and other devices***

Employees, apprentices, and others in receipt of a company owned device should be aware that the device, accessories, software, and operating system remain the property of the company and are provided on a loan basis only. Additional software **MUST NOT** be installed, nor hardware modifications made, without authorisation from an ATP Director.

Personal use of the ICT system is authorised within reasonable limits as long as it does not interfere with or conflict with business use. Employees, learners, and others are responsible for exercising good judgement regarding the reasonableness of personal use

## **Social Networking**

Under no circumstance should staff communicate with apprentices via social media unless in a business context, such as Linked In.

## **Personal Telephone Numbers**

Staff should not give personal telephone numbers or a personal email address to learners/young adult learners. Should it be necessary for learners /young adult learners to contact staff members only the Centre's office number and email correspondence should be given by staff.

For further guidance please see

**'Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings' dated March 2009.**

## **Computing and ICT Facilities**

Although the ATP do not have any physical sites that students have access to, when using The ATP computing and ICT facilities (which includes all virtual machines and devices) users must not:

***Please refer also to ATP Teams Guidance Notes on IT Acceptable Usage.***

- Alter any settings
- Allow other people to use your account,
- Give their password to someone else to use, and/or disclose their password to someone else, and/or be otherwise careless with their password (N.B. personal passwords should be changed regularly),
- Disrupt the work of other people,
- Corrupt or destroy other peoples' data,
- Violate the privacy of other people,
- Offend, harass, or bully other people,
- Break the law,
- Waste employee effort or resources,
- Store files not related to their study or work at The ATP on The ATP computing resources,
- Engage in software piracy (including infringement of software licences or copyright provisions),
- Generate messages which appear to originate with someone else, or otherwise attempting to impersonate someone else,
- Physically damage or otherwise interfere with computing facilities, including attaching any un-approved hardware,
- Waste computing resources by playing games or using software, which is not needed for studies or work,
- Engage in any activity which is rude, offensive, or illegal,
- Use the ICT facilities to draw people into terrorism and/or extremism,
- Download and/or run programs or other executable software from the Internet or knowingly introduce viruses or other harmful programmes or files,
- Enable unauthorised third-party access to the system,
- Use the ICT facilities for commercial gain without the explicit permission of the Head of Finance and Contracts.
- Engage in any activity that denies service to other people or brings the ATP.

When using computing and ICT facilities users may:

- Join a public forum (e.g., social networking site, news group, etc.) if this is a specific requirement of their course or work,
- Only attach headphones and external memory drives to computers,
- Alter computer settings to improve accessibility with the support of an appropriate employee and return to the original settings after use.
- Log out of your account if you are leaving a computer for an extended period of time, or otherwise lock the screen if you leave the keyboard and computer,
- Take appropriate actions to physically secure equipment issued to you for the purposes of study or work.

## **Company Provided Mobile Phones – Telephony System**

Employees with company provided mobile telephones must remember the phone is for company business use only and personal calls should be kept to a minimum. Employees will be obliged to reimburse the company for excessive private calls made on a phone, or excessive use of data, when requested to do so.

The ATP does not allow any members of staff to use mobile telephones when driving on company business without a hands-free kit. An employee who fails to comply with these procedures will be subject to the Disciplinary Procedure.

## **Employee laptops**

When issued with a company laptop, employees will be required to agree to several insurance conditions which will include:

- The laptop will be encrypted prior to issue
- The laptop will at no time be left in a visible position in any unattended, unlocked vehicle but will be placed in the locked boot of a vehicle,
- The laptop will only be kept at employees work premises (home unless otherwise stated) or a locked hotel bedroom when away on company business, but will not be taken on a private holiday,
- Any property in which the laptop is kept will be secured when unoccupied,
- Agreement to make the laptop available for inspection by directors or managers at any time,
- Agreement to inform the company immediately if the laptop is lost, stolen or damaged,
- Agreement to return the laptop to the employee's line manager on their last day of service with the company,
- Accept responsibility for any damages caused by neglect, misuse etc. excluding reasonable wear and tear,
- Accept responsibility for the cost of repair/replacement of the laptop in the event of a breach of the above conditions.



Concerned about a child, young person, vulnerable adult, or person(s) in danger, or at risk of radicalisation?

**YES**

Are they in immediate danger?

**NO**

If a child/person is in immediate danger of being harmed or potentially harmed the police should be called on **999**

**Reporting concerns about Terrorism**

- How to report your concerns about terrorism and individuals who may be at risk of radicalization.
- If you are worried about anyone who is at risk of being radicalized by people who are involved in, or support, terrorism please contact.
  - In an emergency, dial 999
  - Anti-Terror Hotline - 0800 789 321
  - MI5 Freephone: 0800 111 4645
  - Telephone: 020 7930 9000

Discuss issues with your line manager ASAP  
Email [safeguarding@theatp.co.uk](mailto:safeguarding@theatp.co.uk)

If issues are not resolved, do you feel more action needs to be taken?

Discuss issues with the lead Safeguarding Officer and PREVENT contact – Lisa Entwistle- office hours 0330 380 0249 Ext 25 (out of hours **- 07944 779 769**)

Can the issues be resolved by the lead Safeguarding Officer?

**NO**

**YES.** Refer to provide a full detailed written account of issue/concerns or episode. Remember to provide dates and names of those involved, if sending electronic, data must be password protected.

**THINK, TAKE ACTION!**

Safeguarding Officer(s) to contact relevant agencies in necessary; ensuring all issues are documented and data kept secure.



Reviewed: January 2022  
For review: January 2023