

SANDWELL & WEST BIRMINGHAM NHS TRUST PROVIDER

SAFEGUARDING POLICY (INCLUDING PREVENT RADICALISATION)

Policy author	Apprenticeship Co-ordinators
Approving body	SWB Apprenticeship Board
Accountable Executive Lead	Director of People and OD
Signature	
Policy Sign Off Date	10 June 2025

**ESSENTIAL READING FOR THE
 FOLLOWING STAFF GROUPS:**

- 1 All Provider Staff
- 2 Apprentices
- 3 Employers

**STAFF GROUPS WHICH
 SHOULD BE AWARE OF THE
 POLICY FOR REFERENCE
 PURPOSES**

1. Apprenticeship Board Members
2. Trust Safeguarding Leads

POLICY APPROVAL DATE:
April 2022

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IMPLEMENTATION DATE:**
April 2022

**DATE POLICY TO
BE REVIEWED:**
June 2026



**Sandwell and
West Birmingham**
NHS Trust

DOCUMENT CONTROL AND HISTORY

Version no	Date Approved	Date of Implementation	Next Review Date	Reason for change (e.g. full rewrite, amendment to reflect new legislation, updated flowchart)
1	May 2019	May 2019	May 2021	March 2019, policy created.
2	May 2021	May 2019 ongoing	January 2022	Covid Appendix 2 added May 2021 Policy reviewed by the Safeguarding Trust leads May 2021. Policy reviewed locally and remained current until January 2022 due to Covid pandemic.
3	April 2022	April 2022	April 2023	September 2021 amendment; the policy now needs to be reviewed annually under the statutory guidelines of "Keep Children Safe in Education 2021." Included relevant safeguarding children's legislation and added detail on peer-on-peer abuse. Annual Review due.
4	August 2023	August 2023	August 2024	12/07/23 policy reviewed. Legislation dates and regional safeguarding coordinator details updated. Governance Board responsibilities reviewed and updated.
5	August 2024	August 2024	August 2025	03/07/24 policy reviewed. Legislation dates updated. Board and subcontractors training and responsibilities reviewed and updated.
5	June 2025	June 2025	June 2026	Change of review date due to management structure

Safeguarding Policy (including Prevent Radicalisation)

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1.0 Introduction

- 1.1 The welfare of all Apprentices is paramount. Sandwell & West Birmingham NHS Trust Provider Team is committed to supporting Apprentices by valuing them, listening to them, and respecting them within a learning setting which promotes success.
- 1.2 All Apprentices have access to the resources, planned programmes, support and at least 20% off-the-job training to meet their individual needs. Developing Apprentices awareness through training and education of safeguarding and Prevent ensures we recognise good practice that protects them.

Other policies and forms to which this policy relates:

Information and Cyber Security Policy, Domestic Violence/Abuse Policy, SWB Safeguarding children policy, SWB Policy for the safeguarding and protection of adults at risk, Prevent Policy, IT User Policy, Younger Works Policy, Workplace Health and Safety Assessment and Agreement and Safeguarding Reporting Form. In addition, employer organisations external to SWB NHS Trust, should also adhere to their own organisational policies and procedures, relevant to Safeguarding and Prevent.

2.0 Objectives

- 2.1 This policy will be reviewed on an on-going basis in accordance with changes to legislation. The formal review and on-going development of this policy will be led by the Designated Safeguarding Officer and approved by the Widening Participation Manager. This policy covers Apprentices, managers/ employers, trainers/coaches, including senior managers, directors and or clinical specialists. Staff at the Sandwell & West Birmingham NHS Trust Provider should adhere to this policy and share it with any external visitors who are connected to our Apprenticeship training programmes. It should be used in line with each employer's individual organisational guidance / policies for safeguarding and Prevent and with any Awarding Bodies' / EPA guidelines. Safeguarding is promoted throughout via emails, conversations, and our e-portfolio (OneFile).

3.0 Scope

- 3.1 Sandwell & West Birmingham NHS Trust Provider believe that the safety and welfare of all Apprentices is essential. It is our responsibility to recognise and deal with any concerns in relation to safety and welfare, by committing to practices that protect Apprentices and prevent abuse. This policy sets out our pledge to safeguard our Apprentices and provides a clear framework to fulfil that assurance in which we promote safety and welfare of all. This policy incorporates all aspects of safeguarding including the prevention of young people becoming extremist or being radicalised. It details how to record and report concerns. It defines our methods to ensuring safe staff recruitment practices, staff training, and how to deal with safeguarding issues. The policy applies to all Apprentices and staff, including senior managers, board members, employers and sub-contractors. The policy is available on the Trust website.
- 3.2 This policy will apply to all connected to an Apprentice receiving training from Sandwell & West Birmingham NHS Trust Provider, as well as their Employers, and it is issued to them on the commencement of a new Apprentice. New provider staff receive a copy of the policy on induction. The policy considers the parameters regarding the following:

- 3.2.1 'Working Together to Safeguard Children' (HM Government July 2023)
[Working Together To Safeguard Children](#)

- 3.2.2 'Keeping Children Safe in Education' September 2024, statutory guidance from the Department of Education (DfE), including, What to Do if You are Worried a Child is being Abused.
[Keeping Children Safe in Education September 2024](#)
- 3.2.3 Children's Act 1989, Children's Act 2004, Children and Social Work 2017, and Education and Training (Welfare of Children) Act 2021 ,these Acts make provision for the safety and welfare of children.
- 3.2.4 Safeguarding Vulnerable Groups Act 2006 and the Protection of Freedoms Act 2012, which aims to help avoid harm, or risk of harm, by preventing people who are deemed unsuitable to work with children and vulnerable adults from gaining access to them through their work.
- 3.2.5 Counter-Terrorism and Security Act 2015, which under section 26 requires Sandwell & West Birmingham NHS Trust Provider as a Training Provider, to have due regard to the need to prevent people from being drawn into terrorism, also in line with the revised 2018 Contest Strategy Prevent aims to safeguard vulnerable people to stop them becoming terrorists or supporting terrorism.
- 3.2.6 The duty is commonly referred to as Prevent statutory duty or Prevent duty (the duty), these are the terms known to most practitioners across the sector.
- 3.2.7 The Education Inspection Framework July 2023
[Education inspection framework \(EIF\) - GOV.UK \(www.gov.uk\)](#)

4.0 **Definition of Safeguarding**

- 4.1 The term 'safeguarding' is the action that is taken to promote the welfare of both child and vulnerable adult protection and promotes them from harm. Safeguarding incorporates Apprentices' health and safety, human rights, welfare and mental well-being.
- 4.2 This policy outlines the importance of the Provider's responsibility to safeguard and promote the welfare of all our Apprentices and staff by protecting them from physical, sexual or emotional abuse, neglect and bullying. This policy should be read in conjunction with the Trust's and/ or the employer organisation's Safeguarding Children Policy and Safeguarding and Protection of Vulnerable Adults Policy.
- 4.3 As a provider of a government funded training programme, we have a duty to safeguard our Apprentices and to take steps that will try to ensure their safety (children under 18 or vulnerable adults) at all times.

5.0 **Roles and Responsibilities**

5.1 Apprenticeship Training Provider Manager

- 5.1.1 Has overall and ultimate responsibility for Safeguarding (supported by the Apprenticeship Board) and will deal with issues or concerns in the absence of a Designated Safeguarding Officer (DSO).

5.2 Designated Safeguarding Officer (DSO)

- 5.2.1 Leads on Safeguarding for the provider, managing on a day-to-day basis and keeping up to date with safeguarding changes.

- 5.2.2 Ensures working practices are in place to safeguard and promote the welfare of all Apprentices and staff.
- 5.2.3 To be the first point of contact within the provider for guidance, support, referrals and general queries on safeguarding.
- 5.2.4 All Apprentices have a briefing with the Sandwell & West Birmingham NHS Trust Provider DSO within the first 6 weeks of commencing their learning programme.
- 5.2.5 The DSO will contact all vulnerable Apprentices, including 16–18-year-olds, in the first month/6 weeks after their start date to include reminders of key welfare support opportunities, contacts and to explore identified welfare and safeguarding issues.
- 5.2.6 Responsible for making appropriate decisions when investigating and reporting concerns in conjunction with the Trusts' Safeguarding Leads.
- 5.2.7 Attend the Trust's Safeguarding Steering Group
- 5.2.8 Create, and maintain secure concern files of safeguarding referrals and or allegations of abuse.
- 5.2.9 Complete the referral process and follow up referrals made, internally and with external agencies.
- 5.2.10 Ensure effective systems are in place to flag learners leaving or completing their programme to DSO which will allow the consideration of ongoing safeguarding implications and support to take place.
- 5.2.11 Monitor any possible safeguarding trends.
- 5.2.12 Plan, develop and manage Provider staff training.
- 5.2.13 Keeps the Widening Participation Manager up to date with Safeguarding arrangements and any necessary policy amendments.

5.3 Sandwell & West Birmingham NHS Trust Provider Staff

- 5.3.1 Have a responsibility to promote safeguarding to learners and employers; and ensure they offer a safe working and learning environment for Apprentices. All staff must attend and complete Safeguarding training and comply with all mandatory training applicable to their role. As a provider we follow the SWB Trust's Recruitment Policy when recruiting staff, this includes such things as ensuring an interviewer has safeguarding training, gaps in interviewees employment history are reviewed and written references are approved.
- 5.3.2 The employer of the Sandwell & West Birmingham NHS Trust Provider Team has robust recruitment arrangements in place to ensure any necessary Disclosure and Barring Service checks are completed at each recruitment opportunity.
- 5.3.3 To have a clear understanding of what is meant by safeguarding and promote the welfare of Apprentices.
- 5.3.4 Be aware of their statutory duties for the Apprentice and or vulnerable adult
- 5.3.5 Be aware of any potential signs or indicators of safeguarding issues or abuse
- 5.3.6 Be familiar and clear on their role should there be an incident or concern occur and the action they may need to complete.
- 5.3.7 Be aware of the national Prevent strategy and reporting arrangements.

5.4 Employers

- 5.4.1 To have a clear understanding of what is meant by safeguarding and promote the welfare of Apprentices.
- 5.4.2 Be aware of their statutory duties for the Apprentice and or vulnerable adult.
- 5.4.3 Be aware of any potential signs or indicators of safeguarding issues or abuse.
- 5.4.4 Be familiar and clear on their role should an incident or concern occur and the action they may need to complete.
- 5.4.5 Be aware of the national Prevent strategy and reporting arrangements.

- 5.4.6 It is the responsibility of the employer to ensure employees working alongside the Apprentices are free from convictions and of sound character and judgement and will not pose as any danger or threat to Apprentices.

5.5 Governance Board

- 5.5.1 To have a clear understanding of what is meant by safeguarding and promote the welfare of Apprentices.
- 5.5.2 Be aware of their statutory duties for the Apprentice and or vulnerable adult.
- 5.5.3 Be aware of the national Prevent strategy and reporting arrangements.

5.6 Subcontractors

- 5.6.1 To have a clear understanding of what is meant by safeguarding and promote the welfare of Apprentices.
- 5.6.2 Be aware of their statutory duties for the Apprentice and or vulnerable adult.
- 5.6.3 Be aware of the national Prevent strategy and reporting arrangements.

6.0 **The Management of Safeguarding**

- 6.1 We commit to ensuring that the Apprentice has, as set down in the ESFA rules, 20% off-the-job training time. We commit to providing support through line management and the Apprenticeship Team Co-ordinators, to support all Apprentices' wellbeing and mental health. We will ensure that managers, coaches and co-ordinators from the Sandwell & West Birmingham Provider Team have regular meetings to discuss progress and to action plan should an Apprentice fall behind in learning, or if there is a concern with their wellbeing or they are seen to be struggling to achieve. If an Apprentice requires additional support to pass the apprenticeship they should not be disadvantaged and our commitment is to ensure as many Apprentices as possible who start a programme finish that programme successfully.
- 6.2 All staff have a key responsibility for the Safeguarding of the Apprentices when they attend training. Safeguarding is woven throughout the Apprentice's journey so that we continually educate and increase their awareness and empower our Apprentices to understand the key values within the 'Prevent Agenda', Equality, Diversity and Inclusion and fundamental British Values. When Apprentices are expected for training if they do not attend, we notify the Employer to discuss the absence. The DSO is informed if contact cannot be made, and our Safeguarding/ Prevent Reporting Process is followed. (see Appendix 1)

7.0 Apprentices in the Workplace

- 7.1 As part of the sign up onto a programme a Workplace Health and Safety Assessment and Agreement Health and Safety Form is completed so that health and safety are evaluated and recorded. Apprentices follow their employer absence procedures and employers are encouraged to notify the Trainer/ Coach or the Sandwell & West Birmingham NHS Provider Designated Safeguarding Officer directly, if an apprentice does not attend work and their whereabouts are unknown.

7.2 Photographing Apprentices

- 7.2.1 All persons wishing to record any images of Apprentices must complete the necessary consent form. The Sandwell & West Birmingham NHS Provider Staff

should always challenge any persons acting suspiciously and recording images of an Apprentice without consent. With advances in technology, especially with mobile phones being able to record and transmit images, staff must be extra vigilant. Whilst a ban on the use of mobile phones is not practical and would be difficult to police, staff should certainly challenge any persons using recording equipment without consent.

7.3 All Apprentices

- 7.3.1 The Sandwell & West Birmingham NHS Provider Team aim is to raise awareness and support Apprentices to stay safe and build resilience to threats (including on-line threats). Apprentices are updated and conscious of whom they can contact if they have a concern or issue about their own, or others, safety. Details of SWB Provider Designated Safeguarding Officers are also displayed in all training rooms and we have confidential email only accessed by the Designated Safeguarding Officers.

7.4 Process for raising, recording and investigating concerns

- 7.4.1 The Sandwell & West Birmingham NHS Provider Team have Qualified Designated Safeguarding Officers (DSO) who are available for support and also to report concerns to. Provider team staff, employers, board members, subcontractors and apprentices should report any safeguarding concerns to the DSO. The Safeguarding Officers record and investigate concerns in conjunction with the Trusts' Safeguarding Leads. The Safeguarding Officers keep confidential concern files, compliant to GDPR, and monitor possible trends. In addition all apprentices and all employers have individual logins via their e-portfolio – OneFile and this confidential email address number and Designated Safeguarding Officers contact details are accessible to all.

7.4.1.1 See appendix 1: Safeguarding/ Prevent Reporting Process

7.4.1.2 Safeguarding/ Prevent Reporting Form

7.5 Staff Recruitment, Selection and Pre-employment Checks

- 7.5.1 SWB creates a culture of safe recruitment and, as part of this, ensure that we have in place procedures that help deter, reject, or identify people who pose a risk of harm to our provision. This includes ensuring that ALL persons involved with Apprentices, in all capacities, hold a current and appropriate DBS Certificate. This also includes administration staff, board members and subcontractors.
- 7.5.2 Processes comply with Keeping Children Safe in Education 2023. The Disclosure and Barring Service (DBS) was introduced in 2012, through the Safeguarding Vulnerable Groups Act 2006 and Protection of Freedoms Act 2012, its purpose to reduce the risk of harm to children and vulnerable adults.
- 7.5.3 SWB has DBS and Vetting Procedures in place as part of its recruitment processes to enable SWB to carry out DBS checks as appropriate.
- 7.5.4 When a member of staff changes their job role within SWB, a risk assessment will be completed to ascertain if a new DBS is required. Further guidance can be found in Keeping Children Safe in Education 2022.
- 7.5.5 Independent Safeguarding Authority can be found on the following website www.gov.uk/disclosure-barring-service-check/overview.

8.0 Training

8.1 All staff receive 'Safeguarding and Prevent' training which results in a shared commitment to this policy.

8.2 Apprentice Training

8.2.1 Within induction we ensure ALL apprentices complete Trust Safeguarding mandatory Level 1 Safeguarding Children and Adults. Level Two Safeguarding Children and Adults is also completed dependent on the Apprentices job role, and it is the Apprentice's employer's responsibility to arrange and schedule this within the local on-boarding process. Table of training provided to apprentices:

	Provider Induction- Safeguarding Level 1 (Induction)	Safeguarding Level 2 (e-learning)	Basic Prevent Awareness (e-learning)	WRAP Training (Preventing Radicalisation - Awareness of Prevent) (e-learning)
Clinical Apprentice	✓	✓	✓	✓
Non- clinical Apprentice	✓	Dependant on job role / Employer responsibility	✓	✓

8.2.2 After induction the Apprentices also complete the following training:

- 8.2.2.1 Harassment & Bullying Level 2 – e-learning and assessment
- 8.2.2.2 Health & Safety Level 1- e-learning and assessment
- 8.2.2.3 Oliver McGowan Mandatory Training – Tier 1 or Tier 2 depending on role

8.3 Whilst on their training programme all Apprentices complete additional safeguarding learning:

- 8.3.1 Introduction to Safeguarding Officers and how to report any concerns
- 8.3.2 Training session on Safeguarding in Learning. This covers the following subject:
 - 8.3.2.1 Child Sex Exploitation (CSE)
 - 8.3.2.2 Female Genital Mutilation (FGM)
 - 8.3.2.3 Cyberbullying

8.3.3 Personal Safety and How To Stay Safe – this covers “Safe arrival/ Leaving site”, security arrangement within your workplace

8.3.4 Prevent / Counter Terrorism Police –Run/Hide/Tell

8.3.5 Online Safety– this covers the following topics.

8.3.5.1 Apprentices are made aware of their organisations policies using the internet in their workplace.

8.3.5.2 To understand the risks of the technology, including mobiles, laptops and online activity and how to minimise these risks

8.3.5.3 Know how to communicate any concerns about online safety to the employer and Provider.

8.3.6 Relevant Safeguarding E-learning modules, throughout the duration of their apprenticeship, covering a wide range of current, relevant safeguarding awareness topics for example gun crime; cuckooing, child on child abuse.

8.4 The Sandwell & West Birmingham NHS Provider Team Training

8.4.1 All new Sandwell & West Birmingham NHS Provider staff complete Level 1 Safeguarding within Corporate induction and specific Provider Team policies and processes in relation to apprentices are covered in their local team induction. The Sandwell & West Birmingham NHS Provider Team’s safeguarding training is detailed below:

	Provider Induction- Safeguarding Level 1 (Induction)	Safeguarding Level 2 (e-learning)	Safeguarding Level 3 (classroom)	Basic Prevent Awareness (e-learning)	WRAP Training (Preventing Radicalisation - Awareness of Prevent (e-learning)
Senior Management Team	✓	✓	✓	✓	✓
SWB Provider Staff	✓	✓	✓	✓	✓
Designated Safeguarding Officers (DSO)	✓	✓	✓	✓	✓

8.4.2 After induction the Provider staff also complete the following training:

8.4.2.1 Harassment & Bullying Level 2 – e-learning and assessment

8.4.2.2 Health & Safety Level 1- e-learning and assessment

8.4.2.3 Oliver McGowan Mandatory Training – Tier 1 or Tier 2 depending on role

8.4.3 All staff undertake refresher training for the above every year which can be achieved through eLearning and is monitored by their Line Manager and/ or via our Provider Apprenticeship Board.

8.4.4 Members of Sandwell & West Birmingham NHS Provider Team undertake the following training/CPD:

8.4.4.1 Annual West Midlands Counter Terrorism Police Prevent seminar.

8.4.4.2 Safeguarding in Learning

- 8.4.4.3 Relevant Safeguarding E-learning modules
- 8.4.4.4 Research on new safeguarding issues that are specific for their role, training and geographical area of the provision.

8.4.5 All staff within the Provider team are trained to Level 2 Safeguarding Adults and Level 3 Safeguarding Children, and WRAP Training for 'Preventing radicalisation and Awareness of Prevent'.

- 8.4.5.1 Provider staff are trained to identify and deal with concerns about online safety.
- 8.4.5.2 Provider staff must keep up to date on any risk of harm associated with using the internet, new technology or mobile apps.
- 8.4.5.3 Provider Staff must support appropriate training for apprentices so that they are able to work safely and effectively
- 8.4.5.4 Provider Staff have clear understanding on what is and is not acceptable and report any concerns to DSO

8.4.6 We will also deliver regular safeguarding updates through team meetings (an item on the agenda), OneFile tasks and reading the intranet, at least annually to coincide with any Policy review. It is the responsibility of the Designated Safeguarding Officers to raise awareness amongst the team on a regular basis for example: to support the team to look for safeguarding concerns. The Designated Safeguarding Officers will ensure their formal training is updated annually. Training will be revised and moderated in-line with Government policies and local priorities. Records of both internal and external training will be held on individual OneFile e-portfolio profiles.

8.5 Employers Training

- 8.5.1 Safeguarding is promoted to employers by issuing them with an Apprentice Handbook, on the Apprentice's induction, discussions within progress review meetings and via updates on OneFile announcements.
- 8.5.2 Commitment from both internal and external employers is expected and monitored by ensuring apprentices are supported to receive training; apprentice and manager attendance at Progress Reviews; identification and escalation of Safeguarding/ Prevent concerns.
- 8.5.3 Within the role of the employer it is the employer's responsibility within the local on-boarding process to schedule the appropriate safeguarding training for the Apprentice dependant on the job role and organisational requirements.

8.6 Board Members Training

8.6.1 The Sandwell & West Birmingham NHS Provider Apprenticeship Board members' safeguarding training is detailed below:

	Provider Induction- Safeguarding Level 1 (Induction)	Safeguarding Level 2 (e-learning)	Basic Prevent Awareness	WRAP Training (Preventing Radicalisation - Awareness of Prevent (e-learning)
Board Members	✓	✓	✓	✓

8.7 Subcontractors Training

8.7.1 Subcontractors will complete the safeguarding training as detailed below:

	Provider Induction- Safeguarding LI 1 (Induction)	Safeguarding Level 2 (e-learning)	Basic Prevent Awareness	WRAP Training (Preventing Radicalisation - Awareness of Prevent (e-learning)
Subcontractors	✓	✓	✓	✓

9.0 Risk Assessment

- 9.1 Sandwell & West Birmingham NHS Provider Team ensure a Workplace Health and Safety Assessment and Agreement Form is completed for all 16- to 18-year-old Apprentices in conjunction with the (Health and Safety) Young Workers Policy. This needs to be reviewed on a need's basis (minimum annually).
- 9.2 SWB Training Provider Health & Safety policy and workplace assessment requirements must be adhered to by all, including subcontractors.
- 9.3 Sandwell & West Birmingham NHS Trust Apprenticeship Provider staff will have regular conversations with the Apprentice and employers on safeguarding during progress meetings.

10.0 Prevent

- 10.1 Prevent is part of the Government's counter-terrorist strategy known as CONTEST. Prevent aims to reduce the risk we face from terrorism. All NHS employees have a key role in Prevent and have a legal responsibility to fulfil the prevent duty statement. The strategy focuses on working with vulnerable individuals who may be at risk of being exploited by radicalisers and drawn into terror-related activity.
- 10.2 All Apprentices and members of Sandwell & West Birmingham NHS Provider Team, including board members, employers and subcontractors, undertake the following provider training:

	Prevent Level 1 e-Learning	Basic Prevent Awareness e-learning	WRAP Training (Preventing Radicalisation - Awareness of Prevent (e-learning)
Apprentices	✓	✓	✓
SWB Provider Staff	✓	✓	✓
Designated Safeguarding Officers (DSO)	✓	✓	✓

- 10.3 Employers are informed on how to identify changes in employees and apprentices' behaviour via the 'Apprenticeship Handbook', and this is reviewed bi-monthly via a conversation to discuss awareness and concerns, within the tripartite progress reviews.

Staff, including board members, and apprentices' attend the West Midlands Counter Terrorism Police Prevent seminar which supports them to identify changes in behaviour and signs of radicalisation relating to the local region. For further support in this area, the regional Prevent coordinator is Pardeep Brar and is contactable via email pardeep_brar@sandwell.gov.uk; Mobile: 07500 129348.

10.4 All learning is embedded by staff and Apprentices completing quizzes and e-learning modules relevant to Prevent.

10.5 All concerns should be reported in accordance with the Sandwell & West Birmingham NHS Trust Apprenticeship Safeguarding Policy (including Prevent)

11.0 **Safeguarding Issues**

11.1 **Different Types of Abuse**

11.2 Physical, emotional/psychological, financial, neglect by others (e.g. as a child by your parents), self-neglect, discriminatory abuse (as defined in the Equality Act 2010), organisational abuse.

11.3 **Specific Safeguarding Issues**

11.4 The following issues give an overview of some of the particular safeguarding themes that may affect any Apprentice;

11.4.1 Peer to Peer Abuse

Peer to Peer abuse can happen both inside and outside the Trust and may include, but may not be limited to, bullying (including cyberbullying), up skirting, gender based violence/sexual assaults, consensual and non- consensual sharing of nudes and semi-nudes.

11.4.2 Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example).

11.4.3 Child Sexual Exploitation (CSE)

This is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online. A considerable number of children who are victims of sexual exploitation go missing from home, care and education at some point.

11.4.4 People who are missing

Every year an estimated 200,000 people go missing in the UK. In some cases, missing adults may have made a choice to leave and 'start their lives over again', but the vast majority of missing people, children and adults, are vulnerable and need protection and support. SWB Provider track and monitor the Apprentices attendance on training, so that staff can quickly detect potential safeguarding issues.

11.4.5 Domestic Abuse

Domestic abuse is defined by the Home Office as "any incident of controlling, coercive or threatening behaviour, violence or abuse (psychological, physical, sexual, financial or emotional) between adults, aged 16 and over, who are or have been intimate partners or are family members, regardless of gender and sexuality." This includes honour-based violence, forced marriage and female genital mutilation (FGM). We follow the Trust Domestic violence/abuse policy.

11.4.6 Female Genital Mutilation (FGM)

This comprises all procedures that involve partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reasons. Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act 2003 ("the 2003 Act"). It is a form of child abuse and violence against women. The FGM mandatory reporting duty is a legal duty provided for in the FGM Act 2003 (as amended by the Serious Crime Act 2015). The legislation requires regulated health and social care professionals and teachers in England and Wales to make a report to the police where, in the course of their professional duties, they either:

- 11.4.6.1 Are informed by a girl under 18 that an act of FGM has been carried out on her; or observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth
- 11.4.6.2 For the purposes of the duty, the relevant age is the girl's age at the time of the disclosure/identification of FGM (i.e. it does not apply where a woman aged 18 or over discloses she had FGM when she was fewer than 18). Complying with the duty does not breach any confidentiality requirement or other restriction on disclosure which might otherwise apply. The duty is a personal duty which requires the individual professional who becomes aware of the case to make a report; the responsibility cannot be transferred. The only exception to this is if you know that another individual from your profession has already made a report; there is no requirement to make a second. For more details on how to report FGM please refer to the organisation's guidance on FGM Mandatory Reporting Duty and follow the Trust's Protocol for the Management of Female Genital Mutilation (FGM) in girls under 18 years.

11.4.7 Radicalisation

Protecting individuals from the risk of radicalisation is seen as a wider safeguarding duty and is similar in nature to protecting individuals from other forms of harm and abuse. During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Prevent is part of the Government's counter-terrorist strategy known as CONTEST. Prevent aims to reduce the risk we face from terrorism. NHS employees have a key role in Prevent. The strategy focuses on working with vulnerable individuals who may be at risk of being exploited by radicalisers and drawn into terror-related activity. A training programme of awareness is in place for the duration of their Apprenticeship which includes topics about how to keep them safe from Radicalisation. Provider Staff report concerns on the Safeguarding/ Prevent Reporting Process (Appendix 1) and Safeguarding Reporting Form.

11.4.8 Extremist groups use the internet and social media to spread their ideology and recruit vulnerable young people. They know young people are using the internet much more, quite often by themselves and so utilise these opportunities to exploit and recruit. There is a chance that an Apprentice may meet people online or visit websites that could lead them to adopting what is considered extreme views and become radicalised.

11.4.9 Below is some guidance on how to safeguard your Apprentice from being radicalised and how to identify a concern that they may be at risk.

11.4.9.1 Why do people become radicalised?

- i) The reasons for people being drawn into extremist views are many and varied but may include the following:
- ii) They are trying to make sense of world events.
- iii) They feel that their culture or religion is under threat.
- iv) It makes them feel a sense of identity or belonging or being part of something.
- v) They are looking for adventure or excitement. They have a personal grievance or experience of racism or discrimination and feel they want to change things.
- vi) They are under pressure from their peers who have links with these groups.

11.4.9.2 How are people radicalised?

- i) Apprentice's today have open and unrestricted access to extensive information, so SWB Provider teach skills of critical thinking and questioning the validity of sources. Apprentices are informed that they have a voice; that they can have differing beliefs and views to others, that they are valued members of society who can make an impact on society and bring about change for the better. We ensure that there is transparency regarding Prevent and ensure that everyone involved with Apprentices are all given the same information and know how to request support should they have a concern about someone getting drawn into extremist narratives. Extremists often manipulate people by using emotional

triggers to engage with them and may target them when they are experiencing difficulties such as bereavement, emotional trauma, mental health issues or social isolation. The Prevent Duty is concerned with all forms of grooming that could lead to violent extremism. At the moment, the biggest threats come from Islamist and far right groups but there have also been referrals linked to black supremacism and animal rights extremism.

11.4.9.3 How to voice a concern

- i) If an individual is worried about an Apprentice or have concerns that the Apprentice, or any member of staff, may be being radicalised then the individual can speak to their coach/ trainer or the Apprenticeship Designated Safeguarding Leads, Joan Docherty and Helen Colbourne on their Trust mobiles, or contact them via email (see appendix 2 for contact details).

11.4.10 Grooming

11.4.10.1 This is a word to describe people befriending children and vulnerable adults to take advantage of them for sexual preferences. Grooming is also used by extremist groups to radicalise individuals into supporting and potentially committing terrorist attacks. Groomers will hide their true intentions and may spend a long time gaining a child or vulnerable adult's trust. They may try to gain the trust of the whole family to allow them to be left alone with a child or vulnerable adult. Groomers may deliberately try to work with children or vulnerable adults and gain the trust of their colleagues.

11.4.10.2 Sexual online grooming is when people form relationships with children pretending to be their friend, using social media platforms to do so. The person carrying out the online grooming will try to establish the likelihood of the child telling someone. They will also find out as much as they can on the child's family and social networks. Online groomers will tend to use chat rooms, which are focussed on young people. Those carrying out the grooming will pretend to be a child themselves, similar in age to the person they are grooming. Grooming online is anonymous, and children find it easier to trust an online 'friend' than someone they have met 'face to face'. Children or vulnerable adults may not speak out about their situation because they feel ashamed, guilty or are unaware what they are experiencing is abuse. They may also believe they are in a relationship with the groomer. Key factors that you might observe if someone is being groomed online:

- i) Wanting to spend more and more time on the internet
- ii) Being secretive about who they are talking to online and what particular sites they are viewing
- iii) Switching screens when you come near the computer
- iv) Possessing items – electronic devices or phones expect them to know
- v) Becoming emotionally volatile.

11.4.11 So-called Honour Based Violence

- 11.4.11.1 So-called “honour-based violence” (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community.

11.4.12 Bullying

- 11.4.12.1 Bullying is behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally. Bullying can take many forms (for instance, cyber-bullying via text messages, social media or gaming, which can include the use of images and video) and is often motivated by prejudice against particular groups.
- 11.4.12.2 The rapid development of, and widespread access to, technology has provided a new medium for ‘virtual’ bullying, which can occur in or outside the organisation. Cyber-bullying is a different form of bullying and can happen at all times of the day, with a potentially bigger audience, and more accessories as people forward on content at a click. Cyberbullying involves the use of electronic communication devices. These include mobile phones, tablets, iPods, laptops and PCs. Social media platforms such as Facebook, Instagram, Twitter and WhatsApp are used by cyberbullies to interact negatively with their victims. The Sandwell & West Birmingham NHS Provider has a zero-tolerance approach to all forms of bullying.
- 11.4.12.3 Online Safety- The use of IT / the internet and digital technology plays a vital role in all apprenticeship training programmes, allowing Apprentices to access e-learning, carry out research and collate their portfolio using e-portfolios such as ‘One-file’. To understand and maintain personal online safety, Apprentices need to develop the knowledge and skills to enable them to use the internet/ intranet and digital technology safely and effectively and cultivate appropriate online behaviours. This training is included on their apprenticeship programme – please see section 7.1. IT usage is monitored in conjunction with the Trust’s Information and Cyber Security Policy and IT User Policy, where applicable. For external Apprentices their usage will be monitored by their employer policy.

11.4.13 Mental Health

- 11.4.13.1 Mental health support is available to Apprentices directly and to managers of Apprentices. Links to possible resource:
- i) <https://www.mind.org.uk/information-support/>
 - ii) <https://www.thecalmzone.net/>
 - iii) <https://www.papyrus-uk.org/>
 - iv) <https://www.samaritans.org/>

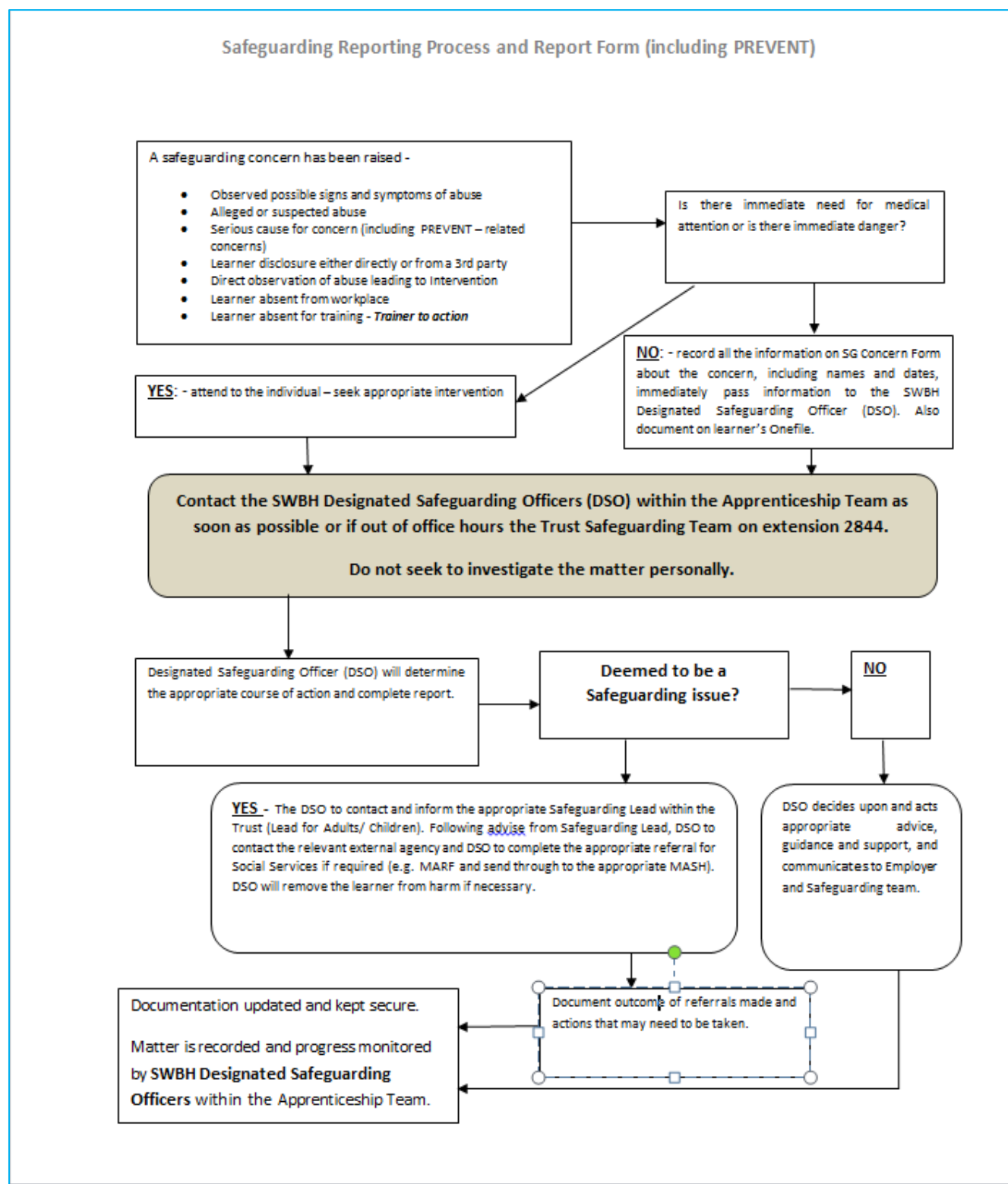
12.0 **Dealing with a Concern**

12.1 Warning signs that may indicate a concern regarding an Apprentice. The list below is not complete, but some of the following identified changes might suggest a possible concern:

- 12.1.1 Sudden lack of money
- 12.1.2 Self-harm
- 12.1.3 Drugs
- 12.1.4 Absence - Missing work or not turning up for training provider sessions
- 12.1.5 Changes in appearance, unwashed, weight loss or gain
- 12.1.6 Alterations in behaviour and character
- 12.1.7 Changes in mood
- 12.1.8 Anxiety
- 12.1.9 Excessive drinking
- 12.1.10 Physical injuries - cuts or bruises
- 12.1.11 Change to/poor living conditions, homelessness
- 12.1.12 Sudden holiday planned/absence from work

Appendix 1

Safeguarding/ Prevent Reporting Process



Appendix 2

Safeguarding Policy – ‘At Risk’/ vulnerable groups and COVID considerations

1.0 Safeguarding of Apprentices

- 1.1 Whilst acknowledging the challenge of the current environment, it is essential from a safeguarding perspective, that, as a Provider, we support our Apprentices during these difficult times.

2.0 Definitions and Scope of Appendix

- 2.1 Whilst this policy and appendix supports all Apprentices of the Provider the key ‘at risk’ groups are children/young people (18 or under), vulnerable children, vulnerable adults and individuals from Black, Asian and Minority Ethnic groups. The Government COVID-19 guidelines for schools and education establishments refer us to the 1989 Children’s Act for the definition which can be found below.

3.0 The definition of vulnerable children is:

- 3.1 Children (18 or less) in need – these include children who are disabled within the meaning of the Children’s Act 1989 Act Section 17(11) which states: ‘... a child is disabled if he is blind, deaf or dumb or suffers from mental disorder of any kind or is substantially and permanently handicapped by illness, injury or congenital deformity...’ NB: It should be noted that this is a direct quote from the 1989 act as per the COVID-19 Governance guidance however the correct term would not be ‘dumb’ but ‘deaf without speech’.
- 3.2 Children (18 or less) who are on/have an Education, health or care (EHC) plan.

4.0 The definition of vulnerable adult is:

- 4.1 Apprentices between 19 and under 25 years old who are on/have an Education, health or care (EHC) plan
- 4.2 Apprentices who are 19 or over and have raised concerns that have identified them as vulnerable e.g. domestic abuse.

5.0 Provider Staff

- 5.1 On any given day Provider staff should be aware of staff locations by consulting the relevant staffs’ shared calendar.

6.0 Learner Mental Health

- 6.1 “Negative experiences and distressing life events, such as the current circumstances; can affect the mental health of pupils and their parents” (DoE 2020). Provider staff should be aware of this in setting expectations of Apprentices’ work where they are at home/staying within their workplace.
- 6.2 The employers of Apprentices have a wealth of health and wellbeing support which they can access and will be signposted to as needed; including mental health support tools and

counsellors for learners to access. Should Apprentices be on site working/ learning they will have access to the SWB Trust health and wellbeing services.

- 6.3 Mental health issues can change Apprentices' behaviours or emotional state, which can be displayed in a range of different ways which can be an indication of an underlying problem. Support for learners in the current circumstances can include existing support (although this may be delivered in different ways, for example over the phone) or from specialist colleagues in occupational health or the wellbeing team. It is important that Provider staff and employers are aware of any changes in learner behaviour to enable support to be offered.

7.0 Online Safety

- 7.1 It is imperative that Apprentices have access to a safe environment to learn, including online. As a Provider we will continue to use the Trusts appropriate filters and monitoring systems for when Apprentices access Provider IT systems or recommended resources.
- 7.2 As the Provider we continue to do what we continue to ensure the safety of all our learners. It is important that all staff that interacts with Apprentices aged 18 years or less, including online, continue to look out for signs a child or adult may be at risk. Any such concerns should be dealt with in line with the Safeguarding policy and where appropriate referrals should still be made to the apprentice's manager, safeguarding team, and social care and as required the police.
- 7.3 The Provider considers the safety of their Apprentices when they are asked to work online. The starting point for online teaching should be in-line with the same principles as set out in the 'Remote Learning Policy' and Safeguarding Policy. These documents describe the acceptable use of technologies, staff learner relationships/ behaviour and communication including the use of social media.
- 7.4 There should be no video messaging with Apprentices.
- 7.5 Enrichment activities to support Cyber Bullying, Online Safety will be shared with Apprentices.
- 7.6 Enrichment activities will ensure there are clear reporting routes in place so that Apprentices can raise any concerns whilst online, to both the Provider and to externally age-appropriate practical support services such as:
- 7.6.1 ChildLine - for support
 - 7.6.2 UK Safer Internet Provider - to report and remove harmful online content
 - 7.6.3 CEOP - for advice on making a report about online abuse
- 7.7 The Provider will ensure the use of online learning tools and systems is in line with privacy and data protection/GDPR requirements.
- 7.8 The Provider will be clear who the Apprentice is going to be interacting with online.
- 7.9 If learners choose to supplement and enrich their learning independently from online companies, the Provider highlights via the 'Remote Learning Strategy' the Apprentice's responsibility for accessing only reputable organisations /individuals.

8.0 Work Placements

- 8.1 It is recognised that Apprentices may be working in an area that is less familiar to them. They should ensure that they raise any concerns with the line manager and only conduct activities which they feel safe and trained to do so. Ensuring there is sufficient handover and training in e.g. Personal Protective Equipment (PPE) and Infection Prevention and Control for the area of work is paramount.
- 8.2 If Apprentices take a break in learning, and are contracted to complete a substantive post during this time, the safeguarding will be the employers' sole responsibility. However, the Provider will support with queries from Apprentices wherever possible during these circumstances.

9.0 Domestic Abuse

- 9.1 As a nation during these stressful times and lockdowns there is unfortunately an increase in domestic abuse. Please be aware of the support that is available to you from external agencies (in the additional information in section 10) and the Trust's Domestic Violence/Abuse Policy. It is important that you raise concerns and access any support in this area that you need. You are welcome to speak to a member of the Provider team who will be able to support signposting you to relevant help and advice or counselling services.

10.0 Raising Concerns and Safeguarding Leads Contact Details

- 10.1 Provider staff should continue to be aware of any concerns in regards to their Apprentices and report these to the Provider safeguarding leads and follow the Safeguarding policies initially.

10.2 Safeguarding Leads:

- 10.2.1 Apprenticeship Safeguarding Leads:
Helen Colbourne helen.colbourne@nhs.net 07790601269
Joan Docherty joan.docherty@nhs.net 07817953097
- 10.2.2 Safeguarding Adult Team SWB Trust:
Clare Cotterill, Safeguarding Adult Lead Nurse,
- Office telephone number: Ext.2612/ 5461- email: clarecotterill@nhs.net
Available 8am to 4pm, phone advise 4pm to 5pm (mobile number only)
- 10.2.3 Safeguarding Children Team SWB Trust:
Safeguarding Adult Lead Nurse Jayne Clarke – email: jayneclarke2@nhs.net
Mobile: 07964039019

11.0 Resources and Links to Support the Safeguarding of Apprentices

- 11.1 SWB Trust Domestic Violence and Abuse Policy – available on Intranet
- 11.2 Occupational Health Service currently offers a free and confidential counselling service, contact number is 0121 507 3306.
- 11.3 Listening Ear - someone to talk to, in strict confidence, at the end of a phone:
- 11.4 Lavinia Hines, 07970 88 21 08 & Chris Rickards, 07976 49 91 80

- 11.5 Visit SWB Wellbeing Sanctuary at The Learning Works in Unett Street, Smethwick. Call 0121 507 5886 for more information and to book a session.
- 11.6 The Recharge Booth - 'virtual' space that allows people to come together with others, reflect, recharge, decompress, and join a safe and confidential discussion - SWB.rechargebooth@nhs.net.
- 11.7 <https://www.legislation.gov.uk/ukpga/2014/6/contents/enacted>
- 11.8 <https://www.gov.uk/government/publications/covid-19-safeguarding-in-schools-colleges-and-other-providers/coronavirus-covid-19-safeguarding-in-schools-colleges-and-other-providers>
- 11.9 <https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2>
- 11.10 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/441643/Children_Act_Guidance_2015.pdf
- 11.11 <https://www.saferinternet.org.uk/advice-Provider/teachers-and-school-staff/appropriate-filtering-and-monitoring>
- 11.12 The UK Council for Internet Safety provides information to help governing boards and proprietors assure themselves that any new arrangements continue to effectively safeguard children online.
- 11.13 The UK Safer Internet Provider's professional online safety helpline also provides support for the children's workforce with any online safety issues they face. Local authorities may also be able to provide support.
- 11.14 Internet matters - for support for parents and carers to keep their children safe online
- 11.15 Net-aware - for support for parents and careers from the NSPCC
- 11.16 Parent info - for support for parents and carers to keep their children safe online
- 11.17 Thinkuknow - for advice from the National Crime Agency to stay safe online
- 11.18 UK Safer Internet Provider - advice for parents and carers
- 12.0 Sources of Advice and Support to Sufferers/Survivors of Domestic Abuse National & Local Support Agencies**
- 12.1 Helplines
 - 12.1.1 National Domestic Abuse Line - 0808 2000 247
 - 12.1.2 **Rights of Women**
 - 12.1.2.1 Rights of Women provides runs a domestic violence and sexual violence advice line and also provides free legal advice for women and produces free leaflets which you can download from their site (including

ones on sexual violence and on sexual harassment). Monday 11am–1pm; Tuesday 10am–12noon.
Textphone: 020 7490 2562
Telephone: 020 7251 8887
Web Address: www.rightsofwomen.org.uk

12.1.3 Men's Advice Line

12.1.3.1 If you are a male victim of domestic violence, in a heterosexual, gay, bisexual or transgender relationship and need confidential help, contact the helpline.

- Telephone: 0808 801 0327
- E-mail: info@mensadviceline.org.uk
- Web Address: www.mensadviceline.org.uk

12.1.4 The Samaritans

12.1.4.1 Available 24 hours a day to provide confidential emotional support for people who are experiencing feelings of distress or despair, including those which may lead to suicide.

- Phone: 0116 2700 007 (local charges apply)
- National helpline: 116 123 (this number is free to call)
- Website: www.samaritans.org
- jo@samaritans.org (UK and ROI) 19

13.0 Action plans

13.1 MIND Wellness Action Plans

13.1.1 The Wellness Action Plan (WAP) is designed for anyone in employment or a voluntary role who would like use the plan to support and promote their mental health and wellbeing at work. You could be:

13.1.2 Currently experiencing a mental health problem and want to find out how a WAP can help you

13.1.3 Currently well, and interested in using the WAP as a proactive tool to map out what needs to be in place for you to be mentally well at work

13.1.3.1 MIND Wellness Action Plans-Employees

13.1.3.2 MIND Wellness Action Plan-Managers

13.1.4 For any further information regarding the WAP please visit the MIND website (link below)

13.1.4.1 Dealing with Anger

13.1.4.2 Depression

13.1.4.3 Eating Disorders

13.1.4.4 Effects of recreational drugs and alcohol

13.1.4.5 Panic Attacks

13.1.4.6 Post -Traumatic Stress Disorder (PTSD)

- 13.1.4.7 Understanding anxiety and panic attacks
- 13.1.4.8 Understanding Mental Health Problems
- 13.1.4.9 What works for you
- 13.1.4.10 Action for happiness
- 13.1.4.11 Suicide Awareness
- 13.1.4.12 Looking after your Mental Health

13.2 **Top Rated Apps**

The below apps are available to download to your smartphone to help you to access the latest information, advice on Mental Health:

13.2.1 **Catch it**

Catch It uses cognitive behavioural therapy (CBT) to help you change the way you think and feel about things.

13.2.2 **Thrive**

A Mental Wellbeing app, which is there for the prevention, screening and management of anxiety, depression and stress.

13.2.3 **Stress and Anxiety Companion**

Stress & Anxiety Companion uses cognitive behavioural therapy (CBT) to help you change the way you think and feel about things.

13.2.4 **SilverCloud**

SilverCloud uses cognitive behavioural therapy (CBT) to help you change the way you think and feel about things. Once registered, you work through a series of topics chosen by your therapist at your own pace, where and when it suits you.

13.3 Links to external websites:

- 13.3.1 Mind Charity – Information and support
- 13.3.2 Mind Charity - How to cope with loneliness
- 13.3.3 Mind Charity – Mental health at work
- 13.3.4 Re-think mental illness – it's time to talk
- 13.3.5 NCT Post Natal Depression
- 13.3.6 Heads Together
- 13.3.7 Mental Health Organisation
- 13.3.8 Young Minds
- 13.3.9 Managing Mental Health In The Workplace
- 13.3.10 Mental Health First Aid-Managers Resource Tool
- 13.3.11 Mental Health First Aid-Support in Leicester
- 13.3.12 Public Health England-Every Mind Matters
- 13.3.13 Children's Mental Health

14.0 **Resources to support Mental Health due to Bereavement**

14.1 **Cruse Bereavement Care**

- 14.1.1 A listening service for those or someone they know who has been affected by a death.

14.1.2 They provide information on practical and financial matters and details of groups available.

14.1.2.1 National Helpline: 0808 808 1677

14.1.2.2 Website: www.cruse.org.uk

14.2 **The Good Grief Trust**

14.2.1 Provides practical help and advice to newly bereaved.

14.2.1.1 Website: <http://www.thegoodgrieftrust.org>

14.3 **Widowed and Young**

14.3.1 A self-help group created to offer support for those bereaved who are under 50. Their website offers helpful information about talking to children, the practicalities of planning the funeral and its aftermath.

14.3.1.1 Website: www.widowedandyoung.org.uk