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Policy Title:	Safeguarding of Learners on Apprenticeships
Date Published:	September 2025
Business Lead:	Learning and Professional Development Business Partner
CCMT sponsor:	Director of People

Thames Valley Police ensures that all policies have been assessed and comply with MoPI Guidance, and the Data Protection Act 2018. In addition, this Policy has been reviewed by the Health and Safety Governance Board and has undergone an Equality Impact Assessment.

1.0 About this Policy

1.1 Rationale

This policy aims to inform everyone connected with Thames Valley Police, and those with whom it subcontracts or comes into connection with, of the Force's position with regard to the safeguarding of apprentices for whom we are the main training provider. See Appendix 5 for an outline of the Police Constable Degree Apprenticeship Programme (PCDA).

1.2 Legislation/National Standards

Education Act (2002)
Children Act (1989 & 2004)
Safeguarding Children (2006)
Care Act (2014)
In Harm's Way – HMIC [2015]
Keeping Children Safe in Education – Department for Education (updated May 2024)
Working Together to Safeguard Children - Department for Education (updated June 2025)

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Information Sharing – Department for Education 2015 (updated May 2024)
Criminal Exploitation of Children & Vulnerable Adults: County Lines
Guidance - Home Office (2017 updated Sep 2018)
Safeguarding Vulnerable Group Act 2006 (updated 2024)
Education inspection framework (EIF) – Ofsted 2019 updated 2023
Further education & skills handbook for Sept 2024 – Ofsted
Guidance for further education providers on work-based learners and the
Prevent statutory duty – Gov.UK (updated 12 May 2021)
Prevent risk assessment tool for FE & Skills – Dept. for Education (Updated
Nov 2023)
Prevent Duty Guidance: England and Wales (updated 2023)

1.3 Intention

Thames Valley Police recognises its legal and moral responsibility to safeguard the welfare of all apprentices by commitment to practice that protects them and looks to minimise potential harm. The purpose of this policy and its supporting documents will be to:

- Provide protection for those on the apprenticeship programmes
- Provide staff and contractors with guidance on procedure they should follow if they suspect an apprentice may be experiencing, or at risk of harm or abuse
- Provide staff with training, guidelines and a code of conduct

1.4 General Principles

1.4.1 Thames Valley Police is committed to ensuring that its apprenticeship programmes offer a safe and friendly environment, where apprentices feel comfortable and valued. Thames Valley Police believes that:

- the welfare of each child is paramount, as enshrined in the Children Act 1989 & 2024 amended
- some children are additionally vulnerable, because of the impact of previous experiences, their levels of dependency, communication needs or other issues
- all apprentices have the right to learn in a safe and caring environment and their welfare is paramount
- all apprentices have the right to expect an adult in a position of responsibility to listen to them when they need to express themselves
- all apprentices regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity have the right to equal

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protection from all types of harm or abuse and should be valued and respected as individuals

- bullying in any form is strictly unacceptable
- racist, homophobic and sexist language or behaviour is strictly unacceptable
- working in partnership with apprentices and with other agencies is essential in promoting a safe learning environment
- adopting robust safeguarding guidelines through procedures and a code of conduct for apprentices, staff, volunteers and contractors is essential
- it is essential to share information about concerns with agencies that need it, and involving apprentices [and their parents if the learner is under 18 years of age] appropriately
- offering support services, referrals and promoting healthy lifestyles is essential, and
- all apprentices must have a ready point of contact, referral or support, such as a Designated Lead, trainer, assessor, line manager and mentor support.

1.4.2 This policy applies to all police officers, police staff, apprentices and other agencies working on behalf of Thames Valley Police. The policy will be reviewed on a regular basis.

2.0 Statement of Policy

2.1 Safeguarding is intended to keep children and adults at risk safe from a range of potential harm and looks at preventative action, not just reaction. It is protecting children from maltreatment, preventing impairment of children's health and development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and taking action to enable all children to have the best outcomes. [Keeping Children Safe in Education, updated 2023]. Thames Valley Police extends its statutory responsibilities to adults at risk.

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2.2 Safeguarding defines how we shall respond to:

Child and Adult at Risk Protection

- Protection from maltreatment [abuse, neglect, exploitation or victimisation] or risk of harm where the perpetrator is a member of the apprentice's family, the wider community, another apprentice or a member of staff, volunteer or contractor.

Welfare Support Needs

- Responding to an apprentice [of any age] via either direct intervention, advice and guidance or signposting where an issue exists within their day to day lives [including the workplace] which could impact upon their ability to achieve.

Recruitment

- Recruiting staff who are committed to offering apprentices a safe, happy and healthy environment and who share in the belief that the welfare of the apprentice is paramount. All staff, volunteers and contractors are required to participate in a vetting and security clearance process proportionate to role. Vetting and security clearance is the subject of periodic review

2.3 Who are we Safeguarding?

The term 'child' means anyone who has not yet attained the age of 18 and the term 'adult at risk' is defined as someone who is:

- aged 18 or over, and
- at risk of abuse or neglect because of their need for care and support.

Even if the adult does not receive any care and support, the fact that they may have a need for such support is enough to mean they are covered by the legislation if they face abuse or neglect

2.4 What are we Safeguarding from?

In line with Working Together to Safeguard Children 2018, safeguarding is defined as:

- Protecting children from maltreatment
- Preventing impairment of a child's health or development
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care

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2.5 Thames Valley Police extends these principles to also cover adults at risk. The following should be considered when working with apprentices:

- Sexual abuse or inappropriate relationships
- Physical and emotional abuse or neglect
- Exploitation e.g. financial, sexual, forced marriage, trafficking
- Female genital mutilation
- Grooming behaviour
- Domestic violence
- Bullying – including cyber bullying, bullying in the workplace
- Radicalisation and/or extremist behaviour & British Values
- Online safety
- The impact of new technologies on sexual behaviour e.g. sexting
- Teenage relationship abuse
- Substance misuse

2.6 Prevent Duty

We have a duty to safeguard and support those vulnerable to radicalisation, to stop them from becoming terrorists or supporting terrorism. We aim to do this by early intervention, identifying them and offering support.

2.7 Identification of Concerns Relating to the Prevent Duty

Concerns might include:

- Expression of views which are against protected groups or individuals
- Third party reports of concerns about behaviour e.g. plans to travel abroad or extremist activities
- Evidence of discriminatory treatment of other groups or individuals
- Evidence of bullying behaviour or harassment
- Evidence of non-compliance with the providers expectations of behaviour
- Possessing, accessing extremist materials, including incel culture
- Evidence of family concern about vulnerability to extremism
- Expression of extremist views including on social media
- Use of extremist language
- Threats of violence

2.8 Online safety

The IT Security Policy states that employees must follow legislation & forbids the use of sites relating to racism/hate, weapons, political/extremist content. The IT Security Policy is included in induction lessons.

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Certain internet sites are blocked via a Secure Web Gateway product. Internet access can be viewed or audited by others, including the Professional Standards Department.

Apprentices shall be made aware of the importance of online safety during induction and reminders included in regular newsletters.

2.9 Use of External Speakers

Where we introduce or facilitate external speakers or groups to meet with apprentices - perhaps to provide specialist inputs - effective booking and due diligence procedures must be undertaken to protect apprentices.

The person responsible for arranging the guest speaker should carry out a risk assessment using the risk assessment checklist at **Appendix 4**. The checklist needs to be available for inspection if required.

2.10 Levels of Responsibility

All staff have a duty to act to ensure that the welfare of the apprentice is paramount.

Where it is suspected that an apprentice is experiencing abuse or is vulnerable to radicalisation, this should be immediately reported to the Designated Safeguarding Lead [DSL] or Deputy DSL. The action the DSL shall take will depend on the individual circumstances. **See Appendix 2** for information.

2.11 Code of Conduct - **See Appendix 3**

2.12 Training for Staff, Apprentices, Families, and Carers

All relevant police officers and police staff are required to undertake the Moodle E-learning 'Safeguarding Learners on an Apprenticeship Programme', which aims to ensure all have a shared understanding of how to identify a safeguarding or Prevent duty concern and how to report a disclosure or suspicion of abuse or risk of harm. This shall be followed by regular updates to refresh and extend knowledge on the minimum of a biannual basis.

2.13 All staff shall be made aware of this policy and the processes to follow if they become aware there may be a safeguarding issue. The action that a staff member shall take and the reporting form is available to all relevant staff via Moodle. All apprentices [and where applicable their families and carers] should be aware of information about safeguarding and good practice and how to share

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concerns. Apprentices shall be made aware of how to report concerns at Induction and the information will be permanently available via Moodle.

Safeguarding awareness shall be discussed at team meetings and standardisation meetings. While maintaining confidentiality, safeguarding issues shall be reported to the Apprenticeship Governance Group in order to address any issues and identify any trends and patterns.

Information and Support for Apprentices

2.14 All apprentices shall receive safeguarding information during their induction. Safeguarding shall also be addressed directly with apprentices via the review process.

Apprentices shall be treated sensitively and with dignity should a safeguarding incidence/concern occur or an allegation of abuse be made. Staff shall treat such matters confidentially, notifying colleagues only on a 'need to know' basis under the direct guidance of the Designated Safeguarding Lead.

Confidentiality

2.15 Whilst respecting confidentiality and data protection, Thames Valley Police cannot guarantee confidentiality in all circumstances. If we discover anything that we believe parents/carers, social services or the police should be informed of, we shall do so believing it is in the best interests of the individual involved.

2.16 Reacting to Child Protection Disclosure, Incidents or Concerns

Staff should operate in line with the following process:

Recognition

- Recognition covers both disclosures of abuse and your personal concerns
- Disclosure of abuse is likely to be direct
- A concern that you have may arise from either a conversation or a change in the apprentice's behaviour

Response

- Do not interview – just listen and clarify if necessary
- Remain calm and listen carefully
- Reassure the person that they have done the right thing in reporting their concerns
- Do not make unrealistic promises around confidentiality
- Inform the person that the concerns need to be recorded and passed on so that they can be fully supported, but that only those people who need to know will be informed
- If the issue relates to a crime tell them that we have a duty to record that and they may be asked more about it by a police officer

Reporting

- If you feel confident to take appropriate action (e.g. referring the apprentice to welfare, occupational health), please do so
- Report concerns, and if applicable the action you have taken, verbally to the DSL [or Deputy] as soon as practicably possible, but before the end of the working day
- All disclosures of abuse must be urgently reported to the DSL [or Deputy in their absence]
- Do not discuss the disclosure with anyone else

Recording

- Record precisely what has been alleged/happened – use the words of the apprentice
- The reporting form should be emailed to the DSL – **Appendix 1**
- Your record should use accurate quotation
- If appropriate, include factual observations
- Once reported, it is the DSL's responsibility to take any further decisions as to the actions which would follow

Referral

- The DSL or Deputy DSL shall make a decision to refer a complaint, suspicion or allegation of abuse to the appropriate body, having gathered and examined all the relevant information

In an emergency/risk to life situation

- Do anything necessary to make sure the person is safe; this could include medical attention or ringing 999
- Where possible, consult with your DSL, but do not delay if this would place the individual at increased risk

2.17 Record Keeping

Records regarding an apprentice's welfare need to be clear, concise and accurate. The reporting form to use is at **Appendix 1**.

The Data Protection Act 2018 and UK General Data Protection Regulation shall not be a barrier to the sharing of information for the purpose of safeguarding. Information regarding safeguarding and Prevent should have limited circulation and be marked as 'Official – Sensitive'. Records of safeguarding issues shall be kept by the DSL. The person reporting the concern must destroy their copy of the reporting form once it has been sent to the DSL.

2.18 Reporting Process

The flow chart at **Appendix 2** shows the process to follow.

3.0 Human Rights Articles Engaged

- Article 3 - Freedom from torture and inhuman or degrading treatment
- Article 8 - Right to respect for private and family life
- Article 14 - Protection from discrimination

4.0 Health and Safety at Work

Purpose of the policy is to protect the health and safety of all learners on apprenticeship programmes by ensuring their health and wellbeing.

5.0 Communications, Challenges and Representations

5.1 Communication

The Safeguarding Policy is made available to all delivery staff via the Knowzone and Moodle.

5.2 Challenges and representation

Any challenges or representations in respect of this policy should be directed to:

Learning and Professional Development Business Partner
Thames Valley Police
Force Training Centre
Sulhamstead
Reading
Berkshire
RG7 4DX

6.0 Review Date

August 2026

7.0 Related Guidance

Guidance on Safeguarding of Learners on Apprenticeships document on Moodle via the Supporting Apprentices course.

8.0 Freedom of information

Suitable for publication.

9.0 Government Security Classification Policy

Official

10.0 Relevant Supporting information

Guidance on Safeguarding of Learners on Apprenticeships document on Moodle via Supporting Apprentices course.

Chief Officer Policy Authorisation

Policy signed off by:

Director of People

Date 7/08/2025

APPENDIX 1

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Recording Form for Safeguarding Concerns

Staff and volunteers are required to complete this form and pass it to the Designated Safeguarding Lead if they have a safeguarding concern about a learner on an apprenticeship programme.

All safeguarding concerns will be stored securely by the Designated Safeguarding Lead. Please ensure that you delete the copy of the form you send to avoid any breaches of data protection.

Full name of apprentice	Age if under 18	Your name and job role

Nature of concern/disclosure

Record precisely what has been alleged/happened – use the words of the apprentice and, if appropriate, include factual observations. Include where you were when the apprentice made a disclosure, what you saw, and what you said.

Please make the apprentice aware that you will need to pass this information on to the DSL.

Time & date of incident/disclosure:

Was there an injury? Yes / No	Did you see it? Yes / No
Delete as appropriate	Delete as appropriate

Describe the injury:

Was anyone else with you? Who?

Please state what action you have taken [if any]

Have you made the apprentice aware you will need to pass on this information?
Yes/No
Delete as appropriate

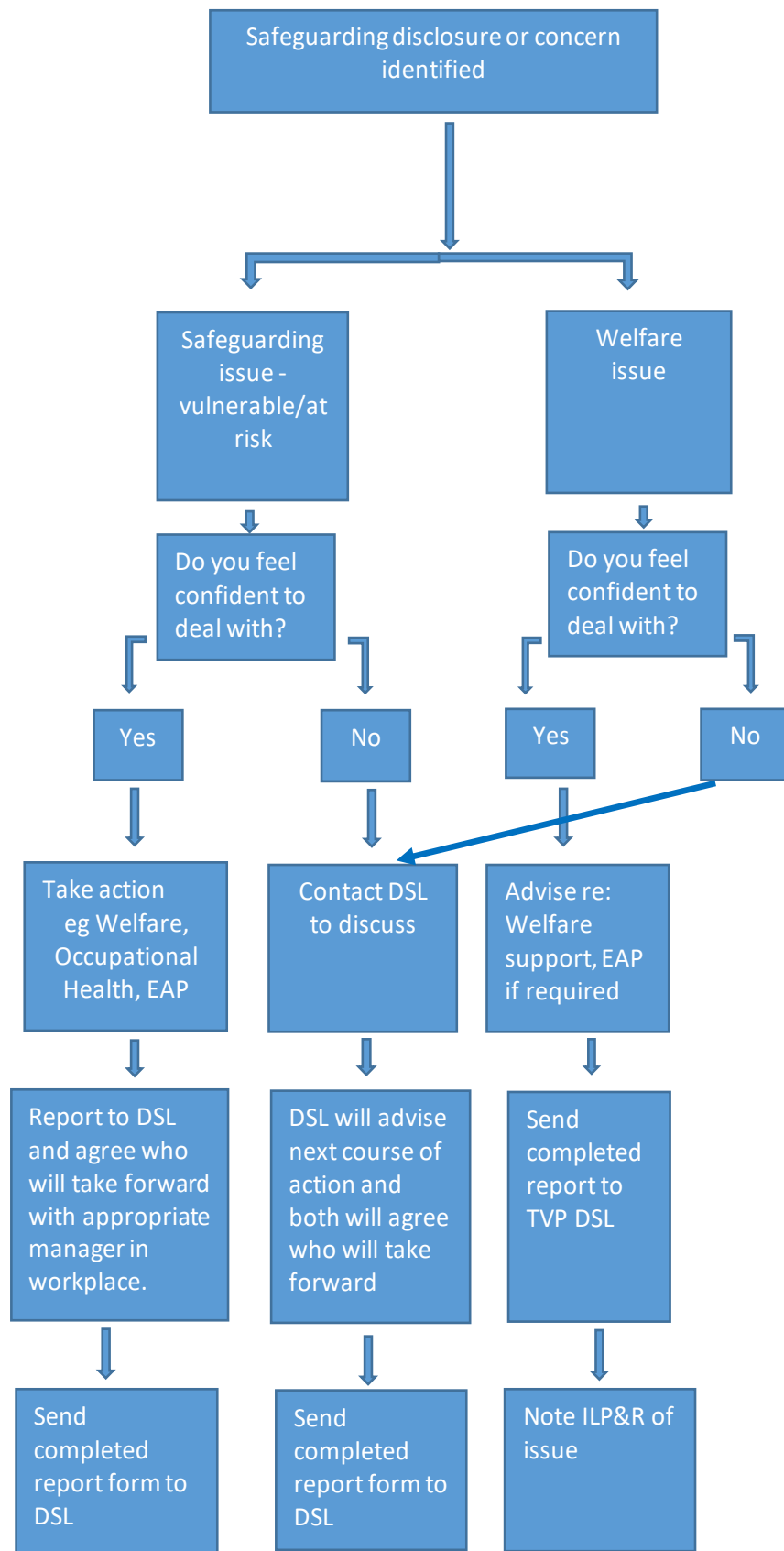
If No, please provide an explanation as to why the apprentice has not been informed

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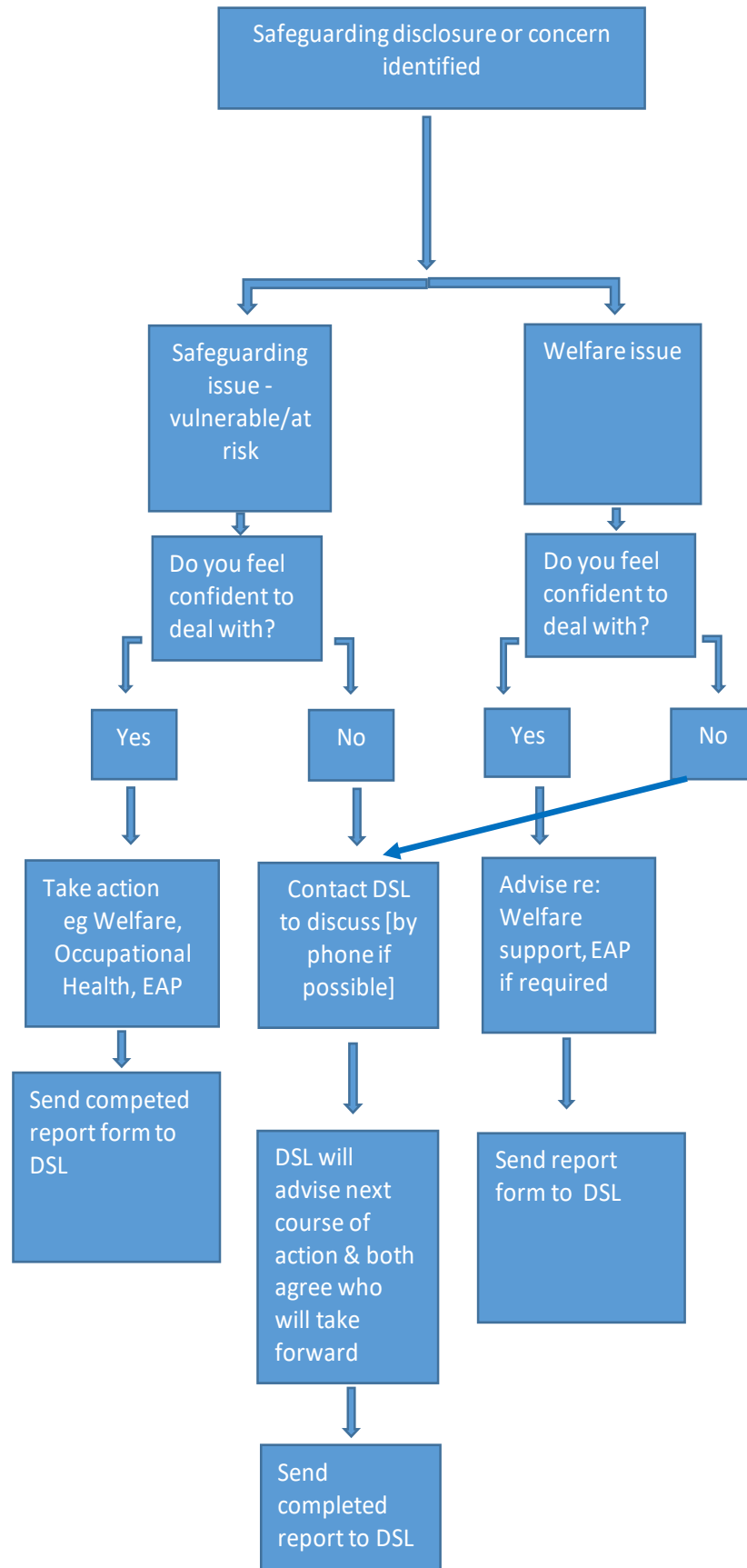
Date information entered onto page 1 of Training ILP&R [if necessary]:
Who are you passing this information to? Name: Position: Designated Safeguarding Lead
Your signature: Time form completed: Date:
Date & time form received by DSL: Action taken by DSL: Full name: DSL Signature: Date:
Further Action Agreed: Full name: DSL Signature: Date:
Follow up action by DSL: Full name: DSL Signature: Date:

Appendix 2

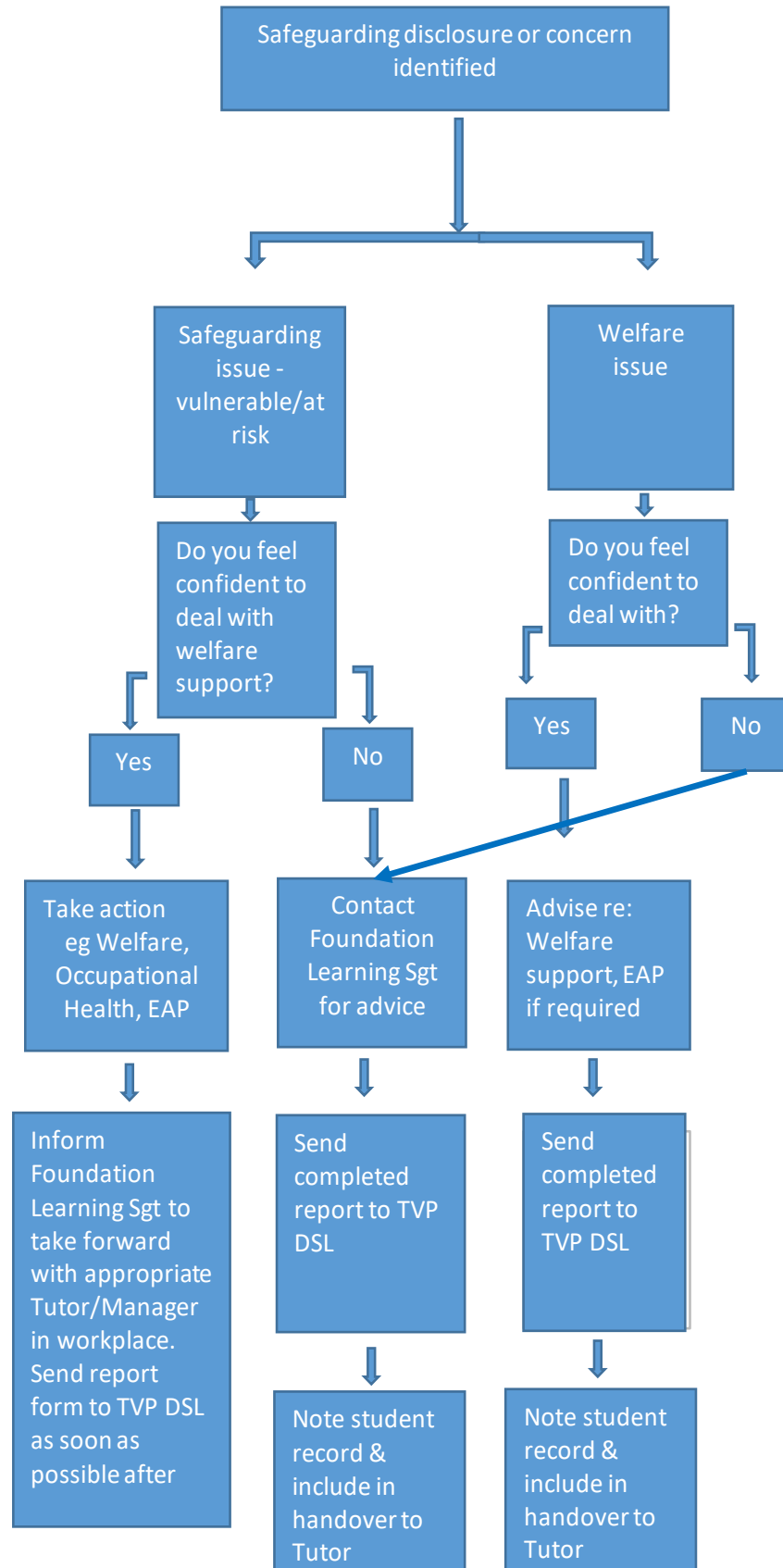
Reporting process for safeguarding issues in CM Training



**Reporting process for safeguarding issues
CM Line managers**

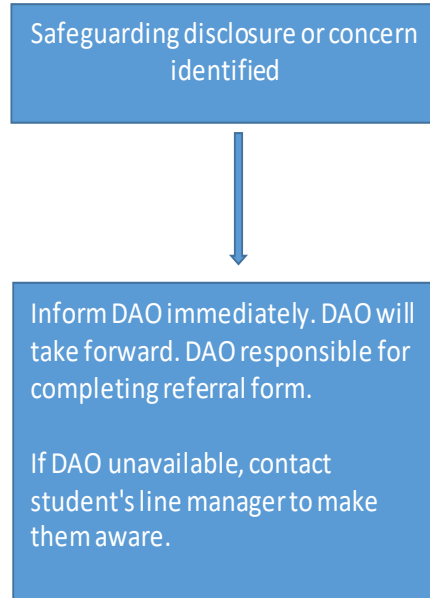


Reporting process for safeguarding issues in training PCSO

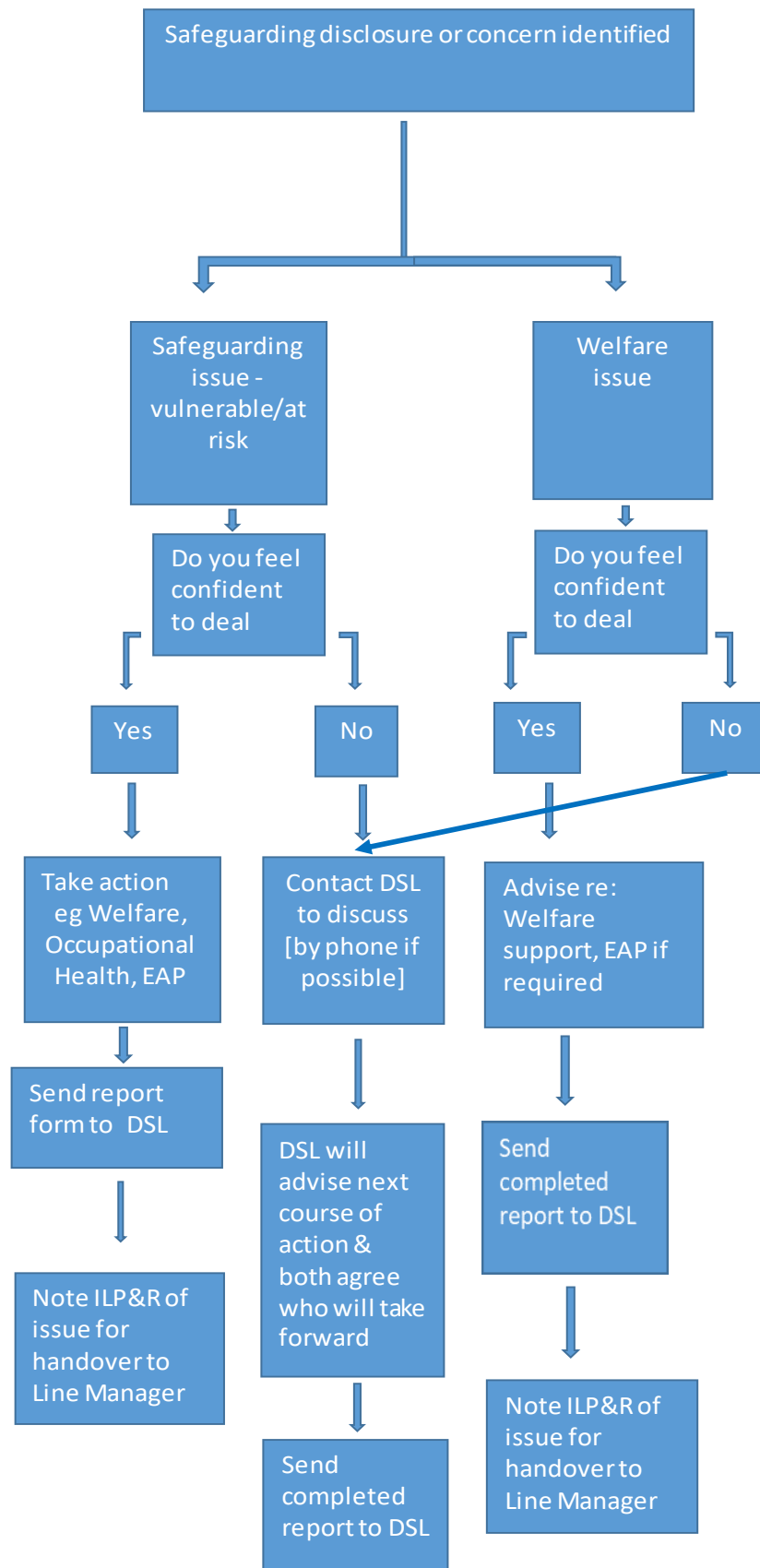


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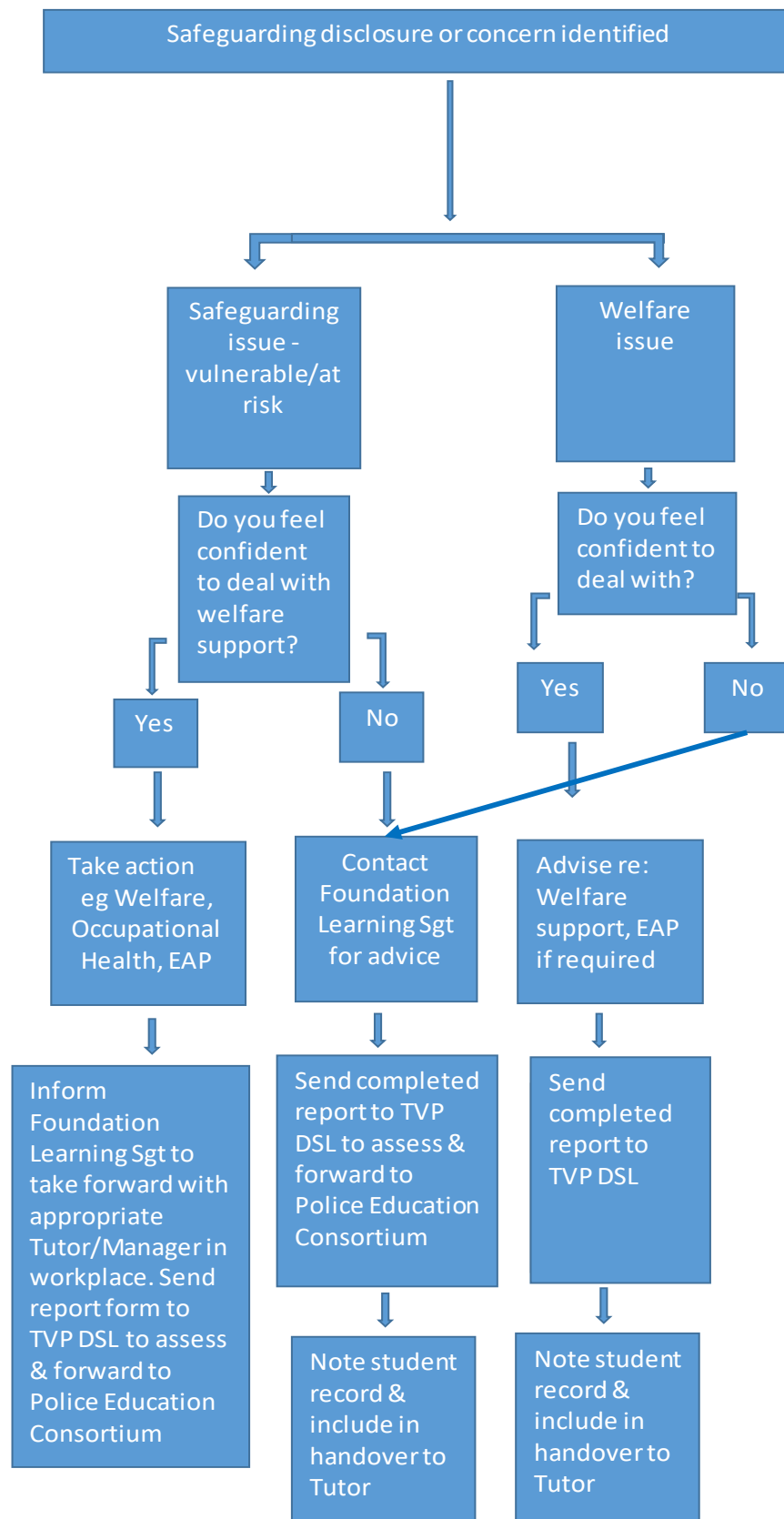
Reporting process for safeguarding issues PCSO Tutors



Reporting process for safeguarding issues - all DAOs

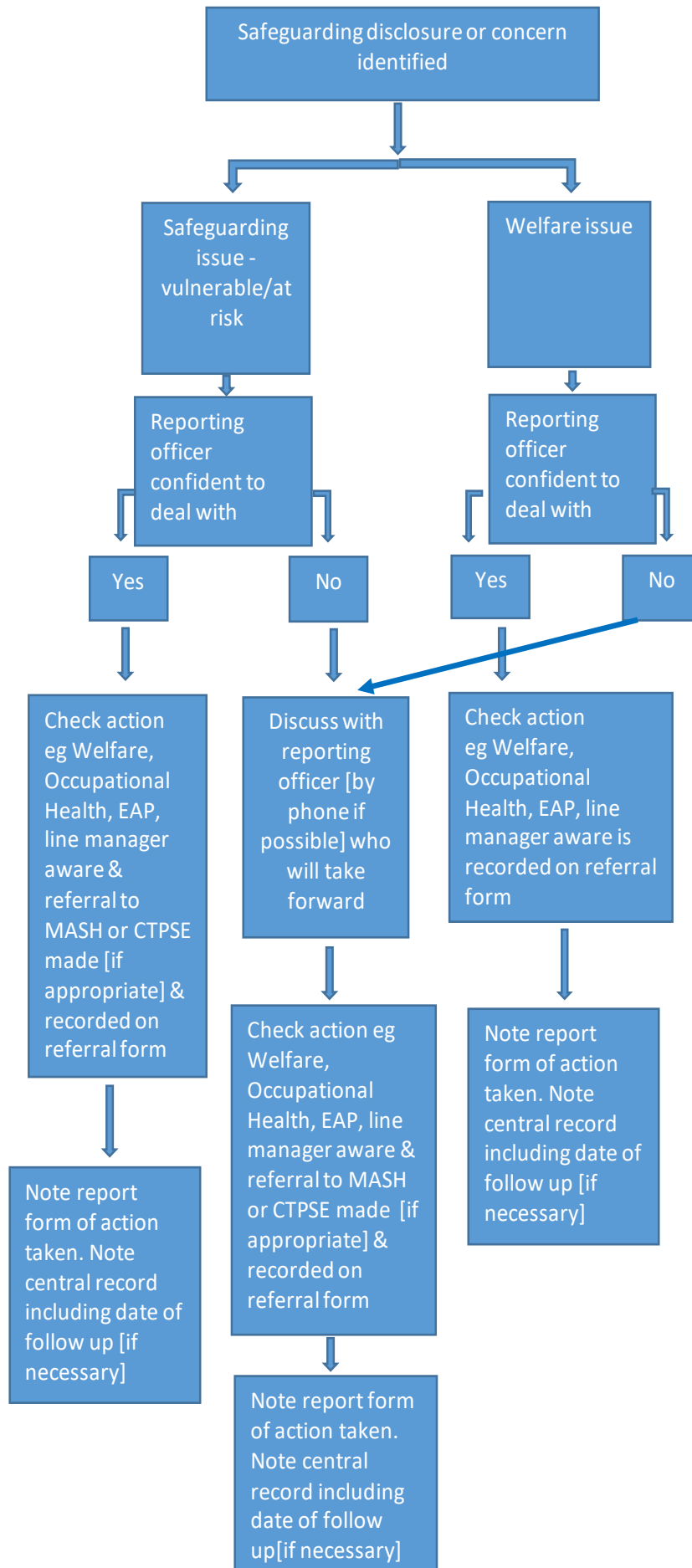


Reporting process for safeguarding issues in training - PCDA



Process for referral of safeguarding issues

DSL actions



APPENDIX 3

Safeguarding Code of Conduct

Thames Valley Police employees are expected to comply with the Code of Ethics, which outlines standards of professional and ethical behaviour. In addition, employees involved in the delivery of apprenticeship training are expected to support the safeguarding concept by following the Safeguarding Code of Conduct:

- Staff should always be aware of the needs of apprentices, and be vigilant for any possible signs of abuse or concerns about their general well-being
- Ignoring abuse is not an option and will not be tolerated
- All staff must report any concerns for the well-being of apprentices in accordance with this policy
- Raise awareness of safeguarding and equip our apprentices with the skills needed to keep them safe
- Ensure all individuals supporting the apprenticeship programme understand their responsibilities in being alert to the signs of abuse and responsibility for referring any concerns to the Designated Safeguarding Lead
- Staff must follow the procedures for identifying, reporting and dealing with suspected cases of abuse or allegations of abuse
- The Designated Safeguarding Lead will develop effective links with relevant agencies and co-operate as required with their enquiries regarding safeguarding matters as required
- The Designated Safeguarding Lead will share information internally and externally about vulnerable individuals whilst maintaining appropriate confidentiality
- All meetings with apprentices should take place as openly as possible. If privacy is needed other staff should be aware of the meeting
- Staff should not have any unnecessary physical contact with apprentices. There may be occasions when physical contact is unavoidable, desirable or necessary, such as providing comfort, reassurance or for physical support. Physical contact should however only take place with the consent of the apprentice and the purpose of the contact should be made clear
- Staff should never meet with an apprentice outside organised meetings or activities

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- Staff should be aware that on occasions, apprentices themselves can be responsible for abusing their peers

Staff should never:

- Allow apprentices to use inappropriate language without challenging them [i.e. racist, sexist or homophobic comments], make suggestive comments in front of, about, or to an apprentice
- Let allegations made by an apprentice go, without being addressed and recorded
- Deter apprentices from making allegations through fear of not being believed
- Jump to conclusions without checking facts
- Rely on their own name and reputation to protect them [i.e. everyone, regardless of position should adhere to these guidelines]
- Discriminate favourably or unfavourably towards any apprentice
- Accept or give gifts
- Develop a personal or sexual relationship with an apprentice

APPENDIX 4**Risk assessment when using external speakers in connection with apprenticeship programmes**

The person responsible for arranging the external speaker should carry out a local risk assessment.

Apprenticeship programme:**Speaker/Subject:****Date risk assessment completed:**

Points to consider	Yes	No
Subject matter to be covered - is it necessary, appropriate and relevant?		
Does the speaker have a presentation and/or notes?		
Has this previously been checked/quality assured by TVP?		
If not previously checked, this needs to be done to ensure in accordance with Code of Ethics and Prevent duty		
Is the presenter a professional from another organisation? If so are there rules/regulations that they are bound by?		
If they are a private individual, has consideration been given to their ability to present to learners and answer questions		
What access do they need? Provided they will be accompanied at all times there is no need for vetting		
Does the audience need to be advised or warned regarding the content of the presentation?		
If so, will the audience be given the option to leave the presentation or speak to someone if they find the subject matter distressing?		

APPENDIX 5

Police Constable Degree Apprenticeship Programme

The Police Education Consortium and Buckinghamshire New University are the main training providers for the PCDA programme and as such have ultimate responsibility for the safeguarding of apprentices. BNU safeguarding and Prevent policies cover the PCDA programme and can be found here:

Safeguarding Policy.pdf (bucks.ac.uk)

Prevent Policy.pdf (bucks.ac.uk)

Police Education Consortium policy

TVP also has a responsibility to ensure apprentices are safeguarded and is committed to practice that protects them and looks to minimise potential harm in the same way as for apprentices for whom TVP is the main training provider. There is therefore a collaborative approach taken to safeguarding and Prevent duty and the preceding information in this policy is to be applied to PCDA apprentices with a slightly different re reporting process for concerns identified. See App 2.

Safeguarding, Welfare, Prevent Process Flow TVP/BNU – PCDA ONLY

