

(NOTE: Throughout this document, THE TEACHER TRAINER LTD is referred to as TTT)

TTT POLICY DOCUMENT

Safeguarding and Prevent Duty Policy

Protecting learners, staff and associates from harm, abuse, neglect and radicalisation.

Document Control

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Policy Owner	Phenil Mehta, Centre Manager and DSL
Designated Safeguarding Lead	Phenil Mehta, 01908 736 777, phenil@theteachertrainer.co.uk
Deputy DSL	Shiera Mae Irizari, Course Coordinator
Approved By	Phenil Mehta, Centre Manager
Classification	Public
Applies To	All learners, staff, assessors, IQAs, associates and third parties

Safeguarding and Prevent Duty Policy

1. Purpose

This policy sets out TTT's commitment to safeguarding the welfare of every learner, staff member and associate engaging with our provision. It defines the principles, responsibilities and procedures that protect individuals from harm, abuse, neglect and radicalisation and it sets out how TTT discharges its statutory Prevent Duty under the Counter-Terrorism and Security Act 2015.

2. Scope

This policy applies to:

- All learners enrolled on TTT qualifications or short courses, including adult learners aged 19 and over and any learner aged 16 to 18 where such provision is delivered
- All TTT staff, including Course Tutors, Course Assessors, IQAs and administrative staff
- Associates, freelance assessors and third parties involved in the delivery or support of TTT provision
- All contexts of engagement, including online virtual classrooms, forums, assessment interactions, written communications and any face-to-face delivery such as employer-led cohorts

3. Definitions

The following terms carry the meanings given throughout this policy.

Safeguarding	Protecting people's health, wellbeing and human rights and enabling them to live free from harm, abuse, neglect and exploitation.
Child	Any person under the age of 18 (Children Act 1989).
Vulnerable Adult	An adult aged 18 or over who has needs for care and support and is unable to protect themselves against abuse or neglect (Care Act 2014).
DSL	Designated Safeguarding Lead. The person accountable for safeguarding decisions and external liaison.
Prevent Duty	The statutory duty under the Counter-Terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism.
Radicalisation	The process by which a person comes to support terrorism and forms of extremism leading to terrorism.
British Values	Democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs.
LADO	Local Authority Designated Officer. The statutory point of contact where an allegation is made against a person who works with children.

Channel	A voluntary, confidential, multi-agency safeguarding programme that supports people vulnerable to being drawn into terrorism.
Disclosure	An account shared by a learner or staff member of harm, abuse or a concern about themselves or another.

4. Policy Statement

TTT is committed to the following principles and commitments.

1. TTT has zero tolerance of abuse, neglect, bullying, harassment or radicalisation in any form.
2. TTT will create and maintain a safe, respectful and supportive learning environment for every learner, staff member and associate.
3. TTT complies with all relevant legislation and statutory guidance, including the Children Act 1989, the Safeguarding Vulnerable Groups Act 2006, the Care Act 2014, the Counter-Terrorism and Security Act 2015, the Equality Act 2010, Working Together to Safeguard Children 2023 and Keeping Children Safe in Education where 16 to 18 provision is within scope.
4. TTT actively promotes fundamental British values throughout its curriculum, delivery and associate conduct.
5. TTT ensures that all staff and associates receive safeguarding and Prevent awareness training at induction and annually thereafter, with additional enhanced training for the DSL and Deputy DSL.
6. All concerns, disclosures and allegations will be taken seriously, recorded and acted upon promptly, proportionately and in line with this policy.
7. TTT will cooperate openly with external agencies, including Local Authority safeguarding services, the Police, the LADO, Channel Panels, the Disclosure and Barring Service and Awarding Organisations where required.
8. TTT adopts safer recruitment practices for all staff and associates who have contact with learners.
9. Confidentiality is respected at all times, balanced with the overriding duty to protect individuals from harm. Information will be shared on a need-to-know basis and in accordance with data protection law.

5. Roles and Responsibilities

The table below sets out safeguarding responsibilities across TTT.

Role	Responsibility
Centre Manager (Phenil Mehta)	Overall accountability for safeguarding and Prevent; designates the DSL and Deputy DSL; ensures resources and training are in place; reviews this policy annually.
Designated Safeguarding Lead	First point of contact for all safeguarding and Prevent concerns; makes referral decisions; liaises with external agencies; maintains the

Role	Responsibility
Deputy DSL	Safeguarding Incident Log; briefs staff on updates; holds enhanced DSL training refreshed every two years.
	Provides cover for the DSL; supports investigation, reporting and record-keeping; holds DSL-level training.
Course Tutor	Creates a safe learning environment; recognises signs of harm or radicalisation; reports concerns to the DSL within 24 hours; promotes British values during delivery.
Course Assessor	Reports concerns arising from assessment submissions, recordings or communications; maintains professional boundaries.
IQA	Monitors safeguarding practice through the sampling strategy; flags any concerns to the DSL.
All Staff and Associates	Complete mandatory safeguarding and Prevent training annually; follow reporting procedures; maintain professional conduct and boundaries; report low-level concerns.
Learner	Know how to raise a concern; treat others with respect; behave safely in all TTT contexts; cooperate with safeguarding procedures.

6. Types of Abuse, Harm and Radicalisation

Staff should be alert to the following categories of harm. Indicators may be subtle, cumulative or absent, so concerns should always be raised even where evidence is uncertain.

Type	Brief Description and Possible Indicators
Physical abuse	Hitting, restraining or causing injury. Indicators include unexplained injuries, pain or withdrawal.
Emotional abuse	Threats, humiliation or coercion. Indicators include anxiety, low self-esteem or fearfulness.
Sexual abuse	Unwanted sexual contact or exposure. Indicators include withdrawal, inappropriate sexualised language or distress.
Neglect	Failure to meet basic needs. Indicators include poor hygiene, hunger or lack of support at home.
Financial abuse	Theft or coercion over money. Indicators include sudden inability to pay fees or loss of possessions.
Discriminatory abuse	Harassment based on a protected characteristic. Indicators include isolation, distress or reports of slurs.
Domestic abuse	Controlling, coercive or violent behaviour by a partner or family member.
Online harm	Cyber-bullying, grooming, exploitation or exposure to extremist content. Indicators include withdrawal from online sessions or distress during or after online interactions.

Type	Brief Description and Possible Indicators
Self-neglect and mental health decline	Failure to care for self; significant deterioration in wellbeing.
Radicalisation	Progression towards support for terrorism or violent extremism. Indicators include expressing extremist views, sudden change in appearance or associates, isolation or rejection of differing views.

7. Prevent Duty and British Values

TTT discharges its Prevent Duty through the following measures.

7.1 Risk assessment

The DSL completes an annual Prevent risk assessment covering learner profile, delivery modes, online spaces and partnerships. The assessment is reviewed after any incident or significant change.

7.2 Curriculum and delivery

British values are embedded throughout delivery. Course Tutors promote open, respectful debate and challenge extremist or intolerant views constructively.

7.3 Online safety

Virtual classrooms and forums are moderated. Learners are briefed on acceptable conduct during induction. Concerns about extremist content are escalated to the DSL immediately.

7.4 Referral and Channel

Where radicalisation is suspected, the DSL will contact the regional Prevent coordinator or local police Prevent team and, if appropriate, refer to the Channel programme. Channel participation is voluntary and confidential.

7.5 Staff training

All staff complete the Home Office Prevent awareness e-learning at induction and refresh annually. The DSL completes enhanced Prevent training.

8. Procedure

8.1 Recognising a concern

Staff should be alert to changes in behaviour, appearance, engagement or written output. Concerns may arise from learner disclosures, observations, third-party reports or content within assessments.

8.2 Responding to a disclosure

- Listen calmly without interrupting or leading the account
- Reassure the learner that they have done the right thing
- Do not promise confidentiality; explain the need to share with the DSL
- Record the words used by the learner as soon as possible after the conversation

- Report to the DSL without delay

8.3 Reporting to the DSL

All concerns are reported to the DSL within 24 hours of identification, in person or by secure email. Where there is immediate danger to life, the Police (999) are contacted first and the DSL is informed thereafter.

8.4 Referral to external agencies

The DSL decides the appropriate external referral within 24 hours of receiving the concern. Routes include:

- Local Authority Children's Social Care or Adult Social Care
- Police (999 for emergencies or 101 for non-emergencies)
- LADO where the allegation concerns a person who works with children
- Channel or local Prevent team where radicalisation is suspected
- Relevant Awarding Organisation where the concern affects assessment integrity

8.5 Allegations against staff or associates

Allegations against a member of staff or associate are reported directly to the DSL. The DSL notifies the LADO within one working day where the allegation relates to a person in a position of trust. The accused person may be suspended on full pay pending investigation. Confidentiality is maintained and natural justice is upheld.

8.6 Low-level concerns

Concerns that do not meet the threshold of significant harm are recorded on the Low-Level Concerns Log and reviewed termly by the DSL for patterns. Recording supports early intervention and protects learners, staff and the centre.

8.7 Record keeping

All concerns, referrals and actions are recorded in the Safeguarding Incident Log maintained by the DSL. Records include date, time, source, content, decisions taken and outcomes. Records are held securely for a minimum of seven years after the learner's last engagement with TTT or longer where required by law. Data retention aligns with the TTT Data Protection Policy.

8.8 Information sharing

Information is shared on a need-to-know basis. Consent is sought where appropriate but is not required where sharing is necessary to protect a person from harm. Sharing complies with the UK GDPR and the seven golden rules of information sharing.

9. Online Safety

Given TTT's predominantly online delivery model, online safety is a central safeguarding priority.

- Virtual classrooms are password-protected and only accessible to enrolled learners and approved staff
- Recordings, where made, are stored securely and retained in line with the Data Protection Policy

- Course Tutors avoid one-to-one online contact with learners outside scheduled sessions; where contact is necessary, a second staff member is copied in or the session is recorded
- Staff do not communicate with learners through personal social media accounts
- Learners are briefed during induction on acceptable online behaviour, image and recording consent and how to raise concerns
- Incidents of online harm are reported to the DSL and, where appropriate, to the Police, CEOP or the UK Safer Internet Centre

10. Safer Recruitment

TTT follows safer recruitment practice for all staff, associates and assessors. This includes verified identity checks, right-to-work confirmation, full employment history with any gaps explained, at least two professional references obtained before engagement and Enhanced DBS checks for any role involving regular contact with under-18s or vulnerable adults. All references are checked in writing. The Safer Recruitment Policy provides full detail.

11. Training

Training requirements are as follows.

Role	Training	Frequency
All staff and associates	Safeguarding awareness; Prevent awareness; online safety	Induction and annual refresh
DSL and Deputy DSL	Enhanced DSL training; Prevent lead training	Induction and every two years
Course Tutors	British values in delivery; recognising radicalisation	Annual
All staff	Data protection; professional boundaries; online conduct	Annual

12. Monitoring and Review

This policy is reviewed annually by the Centre Manager as part of TTT's self-evaluation process. Interim reviews are triggered by legislative change, Awarding Organisation requirements, statutory guidance updates, a significant safeguarding incident or stakeholder feedback. The Safeguarding Incident Log is reviewed termly by the DSL for patterns and lessons learned. All outcomes are recorded in the Version History at Section 14.

13. Related Documents

This policy should be read alongside:

- Equality, Diversity and Inclusion Policy
- Health and Safety Policy
- Anti-Bullying and Harassment Policy
- Accessibility and Reasonable Adjustments Policy

- Safer Recruitment Policy
- Data Protection and GDPR Policy
- Staff Code of Conduct
- Learner Code of Conduct
- Online Learning and Digital Conduct Policy
- Whistleblowing Policy

14. Version History

Version	Date	Author	Summary of Changes
1.0	22/04/2026	Phenil Mehta	Supersedes prior Safeguarding Policy dated 07/04/2026. Full rebuild to align with Ofqual centre expectations, Prevent Duty, Care Act 2014, Working Together 2023 and online safeguarding practice.

15. Approval

This policy has been reviewed and approved by the Centre Manager of TTT.

Phenil Mehta
Name

P Mehta
Signature

22/04/2026
Date

16. Key Safeguarding Contacts

Learners and staff with a safeguarding concern should contact the DSL in the first instance. The external contacts below are provided for reference and direct contact where required.

Contact	Details
TTT Designated Safeguarding Lead	Phenil Mehta phenil@theteachertrainer.co.uk 01908 736 777
TTT Deputy DSL	Shiera Mae Irizari admin@theteachertrainer.co.uk
Police (emergency)	999
Police (non-emergency)	101
NSPCC Helpline	0808 800 5000 help@nspcc.org.uk
Milton Keynes Adult Social Care	01908 253772
Milton Keynes Children's Social Care	01908 253169
Milton Keynes LADO	01908 254307
Anti-Terrorist Hotline	0800 789 321
Channel / Prevent	Through local police Prevent team (101)
CEOP (online child exploitation)	www.ceop.police.uk