



Department  
for Education

# **Work based learners and the Prevent statutory duty**

**Guidance for providers**

**September 2018**

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## Summary

This publication provides non-statutory guidance from the Department for Education. It provides operational level advice and guidance to the Further Education (FE) and Skills sector in England on how to meet the requirements referred to as the Prevent Statutory Duty.

It focuses in particular on those organisations that provide learning within a work based learning (WBL) environment which are subject to the provisions of the Counter-Terrorism and Security Act (CTSA) 2015<sup>1</sup>.

## Expiry or review date

This guidance will be reviewed before September 2019.

## Who is this publication for?

This guidance is for:

- Further Education (FE) Colleges
- Skills Providers within the FE sector who are classed as Specified Authorities as outlined in Schedule 6 of the Counter-Terrorism and Security Act 2015

## What is the Prevent Statutory Duty?

Section 26(1) of the CTSA imposes a statutory duty on “specified authorities”, when exercising their functions, “*to have due regard to the need to prevent people from being drawn into terrorism*”.

The CTSA goes on to say “*There is an important role for further education institutions, including sixth form colleges and independent training providers, in helping prevent people being drawn into terrorism, which includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. It is a condition of funding that all further education and independent training providers must comply with relevant legislation and any statutory responsibilities associated with the delivery of education and safeguarding of learners*”.

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<sup>1</sup> <http://www.legislation.gov.uk/ukpga/2015/6/schedule/6/enacted>

The term Prevent Statutory Duty or the Prevent Duty (The Duty) are the most commonly referred to titles by which this requirement is known to most practitioners across the sector.

It is worth remembering at this point that the fundamental aims of Prevent, as part of the revised 2018 Contest Strategy<sup>2</sup> are, *“to safeguard vulnerable people to stop them becoming terrorists or supporting terrorism”*.

## **What are Specified Authorities?**

In broad terms, Specified Authorities are defined within the sector Statutory Guidance<sup>3</sup> as *“further education institutions on the Skills Funding Agency (SFA) register of training organisations (ROTO), including subcontractors which receive more than £100,000 of SFA funding via lead providers”*.

For clarification organisations should consult the CTSA sector specific Statutory Guidance or the Department for Education’s network of Regional Prevent Coordinators<sup>4</sup>.

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<sup>2</sup> <https://www.gov.uk/government/publications/counter-terrorism-strategy-contest>

<sup>3</sup> <https://www.gov.uk/government/publications/prevent-duty-guidance>

<sup>4</sup> <http://www.safecampuscommunities.ac.uk/guidance/regional-coordinators>

## Safeguarding

The requirements of the Prevent Statutory Duty sit firmly within the raft of responsibilities placed upon organisations sitting under the broad banner of Safeguarding. The advice contained within this report should be considered in that context. Compliance with the Duty is monitored by Ofsted through their inspection regime and in accordance with the standards outlined in the Common Inspection Framework (CIF)<sup>5</sup>.

Providers need to have arrangements in place for ensuring the safety and wellbeing of all learners. This includes initial recruitment through induction, participation in learning and support programmes, and progression to subsequent learning and employment. These arrangements must include the identification of vulnerable learners who are in particular need of support and/or at risk of harm. In order to ensure that these arrangements are effectively implemented, monitored and reviewed, a Designated Safeguarding Person (DSP) must be appointed. This person will be the focal point of Safeguarding and Prevent, taking responsibility for co-ordinating effective responses to dealing with any issues raised that could lead to harm through abuse or neglect. The DSP will also ensure that appropriate referral arrangements are in place and will communicate the need for regular training at appropriate levels for all categories of staff, whether directly employed or not.

Key drivers for this report started with Ofsted's update to the Common Inspection Framework published in September 2015 followed by the publication of Ofsted's Thematic Review in July 2016. This publication showed how FE and Skills providers were implementing the requirements of the Prevent Duty. The latter report was set against the backdrop of specific requirements of The Duty being newly imposed on the sector and the "Severe" level terror threat that currently exists in the UK<sup>6</sup>. The report identified that implementation of the Duty was fragmented and that weaknesses were generally found amongst independent learning providers (ILPs).

Ongoing engagement has identified fully the difficult challenges faced by the sector in effectively implementing the Duty within a WBL environment. The establishment of the Register of Apprentice Training Providers in 2017 brought the requirements of the Duty to a range of new organisations which identified the need for further support in this area.

This guidance focusses on arrangements whereby providers undertake responsibility for learners in a work based learning environment but much of the good practice and recommendations identified are transferable to other learner placements and off site learning.

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<sup>5</sup> <https://www.gov.uk/government/publications/common-inspection-framework-education-skills-and-early-years-from-september-2015>

<sup>6</sup> <https://www.mi5.gov.uk/threat-levels>

## Guidance

This guidance is set out to follow the learner journey from recruitment through to completion (or drop out) from their chosen work based training programme and makes recommendations throughout each of its phases.

### Recruitment

1. The WBL journey inevitably begins at the time of recruitment, which may happen in a variety of ways. This could be from learners self-presenting to enquire about training, to organisations that have well developed teams which proactively conduct specific recruitment and development functions. The size and effectiveness of this operation varies significantly but an identifiable characteristic appears to show that staff who perform this operation exclusively as part of their role, appear to be better equipped to identify learning, welfare and safeguarding needs of learners at an early stage. This is likely to have a significant and positive impact on some learners.

#### **Recommendation 1**

Organisations develop safeguarding awareness amongst those involved in the recruitment process. Consideration should be given to a level of bespoke or specialist input to meet the needs of their role.

2. Whilst organisations often have measures in place to identify recognised learning needs of recruits, some organisations have no systems in place to formally flag welfare or safeguarding issues at this early stage.

#### **Recommendation 2**

Organisations develop systems for the early identification, recording and flagging as appropriate of welfare, learning and potential safeguarding needs of learners at time of recruitment.

3. At recruitment stage, face-to-face engagement may not be the preferred method and the process may be conducted entirely by phone/skype and/or through the medium of online form completion. It is clear that there are additional potential risks where face-to-face engagement does not take place during recruitment. The matching of recruits to employers/training is best served where the recruitment process is robust.

### **Recommendation 3**

The use of specific questionnaires to better ensure all potential safeguarding, Prevent and welfare issues are identified and explored at this stage. This would help to reduce risks where no face-to-face engagement takes place during recruitment.

4. Those providers who enrol 16 to 18 year olds should, from moment of recruitment and throughout the learner journey, consider them to be a specific cohort at greater risk due the vulnerabilities associated with their age. Additional safeguarding considerations should be given to this group in every aspect of their training and working life to counter these risks. For example, where learners may be involved in activities away from the workplace or staying overnight, enhanced safeguarding measures must be put in place to afford them the protection required. Should such activities be undertaken it is advised that specialist advice is sought to ensure that effective risk assessments and management of these activities is in place.

### **Recommendation 4**

Those providers with learners aged 16 to 18 should develop specific policies and procedures (or incorporate into existing ones) providing enhanced protection and support for those learners which ensures that staff are aware of the greater risks to this group.

- The identification and selection of suitable employers and training matched to individual's needs is key to ensuring their success. More importantly, the safety of learners in this context being the effective implementation of the Duty and compliance with safeguarding principles. Effective and ongoing due diligence and standardised checks with employers at this stage is a vital component to achieving this. Good partnership and networking across the sector can significantly enhance the effectiveness in this regard. Employers themselves are not subject to the Duty or to statutory requirements in respect of safeguarding in the same way that providers are (unless the employer themselves are a "specified authority"). Therefore, it is essential that providers ensure that employers are sufficiently well informed to understand their vital role as cooperative partners with providers when undertaking to take learners on training programmes. It is the responsibility of providers to ensure that employers understand the requirements of The Duty (and safeguarding generally) to the sort of issues that may be indicators of concern in this regard. This can be achieved in a variety of ways:
- Employer handbook setting out minimum requirements regarding safeguarding, including referral pathways.

- Minimum safeguarding requirements incorporated into contractual agreements
- Provision of leaflets and flyers providing useful information about Prevent, updates and regular communications. This could include general information regarding safeguarding/Prevent highlighting relevant sector specific incidents as learning examples
- Providing or signposting safeguarding/Prevent training for employers and mandating this for their Single Point of Contact (SPOCS) – see this link for free sector specific online training<sup>7</sup> (face to face training should be a consideration for key staff or where weaknesses have been identified).
- Employer events – It is accepted that the widespread geographic nature of some providers makes the holding of events for employers problematic, however regional events, perhaps combined with other partners or providers may be a solution.

## Induction

5. Although in most cases a learner induction process starts with face to face engagement this is not always the case. The risks highlighted in the recruitment process in this respect are mirrored here. Effective induction should not only cover course requirements but should also seek to confirm and identify the needs of learners including welfare and safeguarding issues such as keeping themselves safe from radicalisation and extremism at the outset of the learner journey.

### Recommendation 5

Where possible face to face induction, at the earliest opportunity, should be the preferred option. Where such practice does not exist (whether occasionally or as routine business) then inherent risks should be addressed through a robust quality checked process to ensure potential issues are identified and addressed.

6. Staff assigned to roles related to the recruitment and induction of learners need to have an effective understanding their role beyond the mere establishment of new learners with a programme. They need to understand that in addition to administrative functions their role is an important one in early identification of Prevent and Safeguarding issues and they should therefore be trained and equipped to do so.

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<sup>7</sup> <http://preventforfeandtraining.org.uk/>



## **Recommendation 6**

Staff engaged in the area of recruitment and induction should be provided with a level of Prevent and Safeguarding training that enhances their ability to identify issues where basic or online training may not equip them with.

7. At the time of induction, most learners are provided with learning plans and learner handbooks which set out all requirements of the learner for successful completion of their training and qualification. This should inform them of the availability of mentoring, pastoral support and standards that they may be expected to meet. This includes attendance, study and engagement with assessors.

8. A hallmark of effective practice in this area is the time devoted to ensuring learners are clear on all requirements and responsibilities as well as avenues for support and help. Measures to test understanding (with all or more vulnerable learners) may be beneficial to this as well as follow up reminders of the key points to this induction. Providers should also be aware that there is an expectation that learners will understand British values and how these relate to their work and studies.

## **Recommendation 7**

The provision of detailed Learner Handbooks setting out all available support and safeguarding contacts should be a key requirement for inclusion in induction processes. Mandated and specific additional testing of understanding for more vulnerable learners (including 16 to 18 year olds) should be integrated into these processes and subject to quality checking.

9. Learners may not always settle into new environments but with simple but effective contact and support at this stage can prevent them becoming disillusioned or dropping out of programmes. Such measures can also be an effective check and monitoring process on welfare and safeguarding issues identified at the time of recruitment or induction. Robust processes in this area would include a mandatory number of contacts with learners, including face to face, in the initial period after their enrolment.

## **Recommendation 8**

Mandated follow up contacts with learners in 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.

10. Some organisations conduct diagnostic assessments of learners at time of induction (sometimes referred to as neuro-diversity assessments). This can help to identify whether more in-depth assessments are needed to identify a wide range of potential safeguarding and learning requirements to support learners at the outset.

11. Larger employers often undertake their own formal induction processes, although it is recognised that smaller employers also do this often in a more informal (but not necessarily less effective) way. It is important the providers support and encourage employers in this practice to ensure that messaging is consistent and appropriate.

## Ongoing Assessment

12. Assessors are used most commonly across the sector to monitor the progress and safety of learners during the time of their training and placements. As such they are probably the single most important aspect of the whole process of safeguarding, retention and progression for WBL. Assessors perform a vital role in supporting learners to progress in their learning but also they are a significant tool to ensure that welfare and safeguarding issues are identified at an early stage. This is particularly important for the often lower level concerns that are associated with the early identification of Prevent related concerns. It will also be the role of assessors to explore and embed the importance of British Values with learners.

### Recommendation 9

In order for assessors to be able to carry out this function effectively they must receive robust and role specific Safeguarding and Prevent training. This will include training in the exemplifying and promoting of British Values to learners, as required by Ofsted. The over reliance, in some cases, on broad, generic online training creates a risk that should be managed as a priority by providers.

13. Regular contact with learners by assessors is critical and the frequency and conduct of sessions should be mandated to ensure that this is effective. Such interactions should take account of learning progress as well as welfare and safeguarding requirements. This should also include dialogue between assessor and an employer's designated contact, often referred to as the employer single point of contact (SPOC).

## **Recommendation 10**

Assessor meetings with learners should primarily be face to face and timetabled to ensure that both learner and assessor can prepare in advance. Sessions should be of sufficient length to allow time for exploration of safeguarding and welfare matters as well as British Values and should be in an environment/location conducive to this.

14. General good practice for assessor's progress meetings with learners is to work from pre-determined "check lists" to signpost attention to key issues and to support consistency. This provides a record that all necessary issues are covered and recorded. The use of such a list to record questions about welfare and safeguarding/Prevent, as well to record dialogue with employers, is a useful tool to ensure that this happens and that outcomes are recorded.

## **Recommendation 11**

Ensure that assessor reports on learners are structured to mandate questions regarding welfare and safeguarding/Prevent with both learner and employer.

15. Most employers designate contact for WBL to a dedicated and knowledgeable member of staff (SPOC) who acts as the focus for a provider's contact with the employer. This person plays an important role in the safeguarding and development of the learner. It is vital that this person is well versed in Safeguarding/Prevent and the specific requirements of the provider with regards to safeguarding and reporting. The SPOC should have sufficient knowledge of the learning requirements of any WBLs as well as having sufficient authority and influence within their organisation. In many cases the SPOC will take receipt of any employer handbook or updated versions of it. It is useful to maintain written or electronic records of the receipt of such handbooks, the signposting of important updates and the fact that the employer (often through the SPOC) accepts the responsibilities and requirements placed upon them by the provider.

## **Recommendation 12**

Providers should ensure that employers have a designated contact (SPOC) who has received (and evidenced) a level of Safeguarding/Prevent training (including refreshers) deemed acceptable to the provider.

### **Recommendation 13**

Employers to guarantee that the SPOC will be available to provide feedback to the assessor as well accepting responsibility for fulfilling the requirements on behalf of the employer as outlined in employer handbooks and contractual agreements.

### **Recommendation 14**

Employers to be advised of all learning, health & safety and safeguarding requirements through either a bespoke employer handbook and/or contractual agreement. Such a document (electronic or hard copy) to be delivered against receipt to the employer or their SPOC as well acknowledgement that all requirements are understood and measures are in place prior to learners commencing their placement.

16. Unexplained and lengthy absence from the workplace, study sessions or pre-arranged meetings with assessors could be an indication of safeguarding/Prevent issues and need to be investigated at an early stage. Providers and employers should have clear guidelines on absence reporting involving learners and the measures that should be undertaken with clarity around timeframes. The existence of implementation of such robust procedures provides consistency, protects staff and helps to identify serious concerns at an early stage. Learners that are absent or avoiding interaction should be classed as vulnerable until the circumstances are clarified and all absence involving 16 to 18 year olds should involve early intervention and reporting.

17. Learners in WBL environments are subject to similar expectations regarding the British Values agenda as those in classroom based environments, this is something that is rigorously tested during Ofsted inspections. The use of themed events and inputs throughout the calendar is one useful way of responding to this and gives the added value of consistency across a provider's learner cohort. Also reacting to and using local, national or international events is equally useful to demonstrate British Values to learners in real life. British Values programmes that are integrated into learning and not treated as "add-on's" tend to be better received and more successful.

18. Ofsted expect to see British Values integrated into the curriculum and training so that learners are able to identify where British Values are relevant to their work and everyday lives. Individual learners may be asked during inspections how British Values relate to their studies or training.

### **Recommendation 15**

Providers should develop programmes of learning supporting the British Values agenda, ensuring that this supports learners to develop a mature and appropriate appreciation of British Values and equips them for life in our modern society. This should be appropriate to each level and age group of learner.

## **Closure**

19. The conclusion of a learner's training ends, in most cases, with the successful completion of their programme and achievement of qualification. Even in instances where learners have successfully completed their programme, there are opportunities to check that they were as well supported and safe as providers would have wished. The use of learner surveys is a useful measure to audit the quality of support by providers themselves and by employers, as well as workplace issues such as Health & Safety. Such enquiries on completion (even to those who drop out prior to completion) can provide useful indicators of real life performance in relation the supportive and safe environment that providers seek to create for learners.

### **Recommendation 16**

Providers should develop clear policies regarding learner absence and these should be communicated to employers. Guidance to those investigating such issues must identify potential signs of common vulnerability, when such matters should be escalated and what interventions should be considered.

### **Recommendation 17**

Providers should ensure that effective systems exist to quickly link absence to existing safeguarding/Prevent concerns so that full an rounded decision making can be made by the provider's Designated Safeguarding Person (DSP).

### **Recommendation 18**

The use of learner exit surveys is a helpful tool to check on real life performance by both providers and employers. Analysis of such surveys is important to obtain a broader understanding of issues across organisations.

20. At the end of a learner's programme, whether successful or incomplete, a process should exist to allow the DSP to be notified, within sufficient timeframe to allow the review of any identified and open safeguarding/Prevent matters. This will allow the provider to make informed decisions on where and how the learner might need and be able to access ongoing support or for families, other agencies or follow on organisations (other providers or employers where known) to be involved. In the case of adult learners this will of course necessitate discussion with the learner and in most cases their consent.

21. Sometimes learners progress well and complete their learning ahead of schedule. Systems should be in place to ensure that early closure of their programme is highlighted to DSLs to allow review to take place.

### **Recommendation 19**

Ensure effective systems are in place to flag learners leaving or completing their programme to safeguarding staff which will allow the consideration of ongoing safeguarding implications and support to take place.

## **General**

22. As indicated throughout this guidance, Prevent and many of the issues relating to it form just part of an organisation's safeguarding responsibilities. It also covers the wide range of available guidance documents specific to safeguarding children and adults as well as the standards outlined in Ofsted's Common Inspection Framework<sup>8</sup>. For this reason Prevent and an institution's response to the Duty should be embedded within its existing safeguarding policy and procedures.

23. Providers should have a clear understanding of how Prevent referrals are escalated and shared externally for appropriate support. This includes developing relationships with DfE HE/FE Regional Prevent Coordinators and where appropriate local authority coordinators and safeguarding teams (see also below for partnership guidance), something that is a recognised challenge for providers who have widespread learner cohorts that spread beyond county and regional boundaries.

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<sup>8</sup> <https://www.gov.uk/government/publications/further-education-and-skills-inspection-handbook>

## Recommendation 20

Providers ensure that their response to the Prevent Statutory Duty is embedded within their Safeguarding policy and that they have clearly established external referral procedures, taking into account the need to respond beyond local boundaries.

24. The Prevent Statutory Guidance sets out a number of areas which should be given consideration by “specified authorities” when exercising the necessary due regard to comply with the CTSA.

25. These are set out below:

### Partnership & Leadership

The approach of providers to partnership working in the context of safeguarding/Prevent varies hugely across the sector. The Statutory Duty is quite specific in its expectations of organisations,

*“we would expect active engagement from governors, boards, principals, managers and leaders with other partners”,*

and goes onto suggest a number of possible key partners (DfE Prevent Coordinators, Local Authority, Police). Leaders must ensure that the requirements of the Duty (and safeguarding generally) are effectively embedded within their organisation and that staff tasked with operational implementation are supported and resourced affectively.

### Training

Providers must ensure that their own and sub-contracted staff are effectively trained to understand what radicalisation and extremism mean in the context of their organisation and how they should protect learners and staff. Again the Duty outlines expectations in this respect,

*“We would expect appropriate members of staff to have an understanding of the factors that make people vulnerable to being drawn into terrorism and to challenge extremist ideas ... staff should have sufficient training to be able to recognise this vulnerability and be aware of what action to take in response.”*

Training requirements extend to managers and Board members, as well as Trustees where they exist.

## **Risk assessment and Prevent action plans**

The Duty mandates that “specified authorities” carry out a risk assessment so that they can identify where and how learners and staff may be at risk of being drawn into terrorism and to subsequently develop an action plan to mitigate those risks.

The DfE Prevent Coordinators are available to support organisations in undertaking this process and share good practice with them.

## **Speakers and events**

Where organisations introduce or facilitate external speakers or groups to meet with learners, perhaps to provide specialist inputs or employability training etc, effective booking and due diligence procedures must be undertaken to protect learners.

Such procedures must be implemented in practice and records of such maintained for inspection if required.

## **Safety online**

The internet plays an increasingly dominant role in the process of radicalisation and is used extensively by extremist and terrorist groups. It is therefore vital that organisations have effective measures in place to protect learners and staff from such dangers. The extent of requirements in this regard will vary depending upon the size and nature of the provider and the resources at its disposal.

As a minimum, IT policies, where learners access the internet via the provider’s equipment or connections, must reflect the requirements of the Duty.

Increasingly systems for filtering and monitoring learner’s internet use (whilst using a provider’s IT systems) are being put in place and there are expectations regarding the effectiveness of these to highlight early indicators of risks through internet activity.

In addition, providers are expected to equip learners with an understanding of how to use the internet safely, its inherent dangers and how learners can protect themselves.

## **Welfare and pastoral care**

The Duty challenges institutions to understand the level and nature of pastoral care and support required by their learners. Such provision is likely to be tested during inspection. This includes the provision of policies to effectively manage prayer rooms or other faith-related and non-faith reflection type facilities. Providing such support and facilities to learners in the WBL environment can be particularly challenging for providers and even “signposting” to local facilities and support needs to be subject to checks and a level of due diligence.



## Conclusion

This non-statutory guidance, which aims to highlight the difficulties faced by providers operating within the WBL sector and offer suggestions on how to respond to those difficulties. It recognises the difficulties of effectively implementing the full range of safeguarding responsibilities to learners who in many cases are not under their immediate care and control and who are often seen for limited periods of time in remote locations presents a challenge.

The guidance identifies many good practices already in place with providers and sets the challenge for others to review their existing practices and to implement its recommendations to enhance the safety and wellbeing of their learners. Safeguarding is not a “bolt on” and where treated as such is usually reflected in poor practice and a failure to meet the standards required of the sector.

The DfE, through its Regional HE/FE Prevent Coordinator network, offers a range of measures and advice to support the sector to meet its responsibilities. This support through identification of good practice, local forums and events showcasing practical advice and one to one advice continues to raise standards across the sector and organisations are commended to take advantage of the offer available to them.

# Appendix A

## List of Recommendations

**RECOMMENDATION 1** - Organisations develop safeguarding awareness amongst those involved in the recruitment process. Consideration should be given to a level of bespoke or specialist input to meet the needs of their role.

**RECOMMENDATION 2** - Organisations develop systems for the early identification, recording and flagging as appropriate of welfare, learning and potential safeguarding needs of learners at time of recruitment.

**RECOMMENDATION 3** - The use of specific questionnaires to better ensure all potential safeguarding, Prevent, welfare issues are identified and explored at this stage would help to reduce risks where no face-to-face engagement takes place during recruitment.

**RECOMMENDATION 5** - Where possible face to face induction, at the earliest opportunity, should be the best form of communication. Where such practice does not exist (whether occasionally or as routine business) then inherent risks should be addressed through a robust, quality checked, process to ensure potential issues are identified and addressed.

**RECOMMENDATION 6** - Staff engaged in this area of business (recruitment and induction) should be provided with a level of Prevent and Safeguarding training that enhances their ability to identify issues which either basic or some online training may not equip them with.

**RECOMMENDATION 7** - The provision of detailed Learner Handbooks setting out all available support and safeguarding contacts should be a key requirement for inclusion in induction processes. Mandated and specific additional testing of understanding for more vulnerable learners, (including 16 to 18 year olds) should be integrated into these processes and subject to quality checking.

**RECOMMENDATION 8** - Mandated follow up contacts with learners in first month/6 weeks after start date to include reminders of key welfare support opportunities, contacts and to explore identified welfare and safeguarding issues.

**RECOMMENDATION 9** - In order for assessors to be able to carry out this function effectively they must receive robust and role specific Safeguarding and Prevent training. This should include training in the exemplifying and promoting of British Values to learners, as required by Ofsted.. The over reliance, in some cases, on broad, generic online training creates a risk that should be managed as a priority by providers.

**RECOMMENDATION 10** - Assessor meetings with learners should primarily be face to face & timetabled to ensure that both learner and assessor can prepare in advance. Sessions should be of sufficient length to allow time for exploration of safeguarding and

welfare matters as well as British Values and should be in an environment/location conducive to this.

**RECOMMENDATION 11** - Ensure that assessor reports on learners are structured to mandate questions regarding welfare and safeguarding/Prevent with both learner and employer.

**RECOMMENDATION 12** - Providers should ensure that employers have a designated contact (SPOC) who has received (and evidenced) a level of safeguarding/Prevent training (including refreshers) deemed acceptable to the provider.

**RECOMMENDATION 13** - Employers to guarantee that the SPOC will be available to provide feedback to the assessor as well accepting responsibility for fulfilling the requirements on behalf of the employer as outlined in employer handbooks & contractual agreements.

**RECOMMENDATION 14** - Employers to be advised of all learning, H&S, safeguarding requirements through either a bespoke employer handbook &/or contractual agreement. Such a document (electronic or hard copy) to be delivered against receipt to the employer or their SPOC as well acknowledgement that all requirements are understood & measures are in place prior to learners commencing their placement.

**RECOMMENDATION 15** - Providers should develop programmes of learning supporting the BV agenda, ensuring that this supports learners to develop a mature & appropriate appreciation of BV & equips them for life in our modern society. This should be appropriate to each level & age group of learner.

**RECOMMENDATION 16** - Providers should develop clear policies regarding learner absence & these should be communicated to employers. Guidance to those investigating such issues must identify potential signs of common vulnerability, when such matters should be escalated & what interventions should be considered.

**RECOMMENDATION 17** - Providers should ensure that effective systems exist to quickly link absence to existing safeguarding/Prevent concerns so that full & rounded decision making can be made by the provider's Designated Safeguarding Person (DSP).

**RECOMMENDATION 18** - The use of learner exit surveys is a useful tool to check on real life performance by both providers & employers. Analysis of such surveys is important to obtain broader picture understanding of issues across organisations.

**RECOMMENDATION 19** - Ensure effective systems are in place to flag learners leaving or completing their programme to safeguarding staff to allow the consideration of ongoing safeguarding implications & support to take place.

**RECOMMENDATION 20** - Providers ensure that their response to the Prevent Statutory Duty is embedded within their Safeguarding policy & that they have clearly established external referral procedures, taking into account the need to respond beyond local boundaries.



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