

# Apprenticeship Main Provider Policies & Procedures

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# 1 Summary & Introduction

Leeds Teaching Hospitals Trust (LTHT), through the School of Dental Care Professionals (SODCP), will deliver the Oral Health Practitioner Apprenticeship as a Main Provider which means directly delivering training to apprentices for other organisations.

A regulation of the Education and Skills Funding Agency, (EFSA), and to be compliant, is that all appropriate policies and processes must be specific to LTHT, apprentices, trainers, and any staff involved in the delivery of the apprenticeship.

## 2 Purpose and Effect

The purpose of this document is to provide:

- Guidance
- Key principles
- Detail roles and responsibilities.
- Detail process and procedures.
- Monitoring arrangements

for all apprentices, employers, all School of Dental Care Professionals (SODCP) staff and others who support the delivery of apprenticeship programmes. This is not applicable to all areas of the Trust.

It covers the following key policies:

- Complaints and Grievances
- Equality & Diversity
- Health & Safety
- Learning & Development
- Safeguarding & Prevent

## 3 Key Definitions

Any Key Definitions (if relevant) will be detailed at the start of each policy.

## 4 Key Processes and Supporting Information

### 4.1 Complaints & Grievance

#### 4.1i Key Definitions

<b>Informal Complaint</b>	<p>Is defined as an issue which an apprentice or Employer wishes to raise with a member of SODCP staff, without using the formal complaints process.</p> <p>Informal complaints are usually quick to resolve and unlikely to require an in-depth investigation.</p>
<b>Complaint</b>	<p>Is defined as 'an expression of dissatisfaction about SODCP's action or lack of action, or about the standard of service provided by, or on behalf of SODCP.</p>
<b>Appeal</b>	<p>Is 'a request for a review of a decision taken by an individual or academic body charged with making decisions about student's progression, assessment, and awards.</p>

#### 4.1ii Purpose

This policy sets out Leeds Teaching Hospitals Trust (LTHT) complaints process for employers of apprentices who want to make a complaint about the service provided by LTHT in relation to the apprenticeship programs that we deliver.

LTHT is committed to delivering a high-quality service and takes feedback from both our apprentices and employers very seriously. It is LTHT's aim to settle complaints promptly, fairly and courteously in the best interest of all parties, and to address areas where improvement is needed. LTHT is keen to ensure that the interests and well-being of all those associated with a complaint are properly safeguarded.

LTHT aims to handle complaints in a manner which:

- there is the fair and efficient resolution to issues at the first point of contact
- will be handled by LTHT staff with appropriate seriousness, sympathy and confidentiality; in an open, professional and restorative manner.

- where relevant, ensures that LTHT practice improves as a result.

For effective oversight of processes and provision, our Quality Assurance lead will monitor the complaints received to check for evidence of trends in the failure of provision or delivery. An anonymised summary of complaints on record and how they have been managed will also be reported quarterly to the School Performance and Quality Improvement Group and reported annually to Strategic Apprenticeship Review Group.

#### **4.1iii Employer Guidance Notes for the Appeals & Complaints Procedure**

### **Complaints**

The process for raising a complaint by an employer of an apprentice studying with LTHT is detailed below.

#### **Stage 1: Informal complaints**

Where possible, informal complaints should be raised immediately with relevant departments at the source of the complaint, or via the [leedsth-tr.SODNinfo@nhs.net](mailto:leedsth-tr.SODNinfo@nhs.net). The aim is to resolve the problem directly and informally at the earliest opportunity. It is anticipated that the vast majority of informal complaints will be resolved in this manner.

Although Stage 1 is informal, the member of staff involved should provide a written outcome to the employer complainant, copying in the [leedsth-tr.SODNinfo@nhs.net](mailto:leedsth-tr.SODNinfo@nhs.net) who will record the details of all informal employer complaints. Acknowledgement of the complaint will be provided within 2 working days and a full response given within 4 weeks.

If the employer is unable to raise the complaint at the source, or is dissatisfied with the outcome, they should make a formal complaint (see Stage 2 below).

#### **Stage 2: Formal complaints**

To make a formal complaint, the employer should put the matter in writing to The School of Dental Care Professionals (SODCP) [leedsth-tr.SODNinfo@nhs.net](mailto:leedsth-tr.SODNinfo@nhs.net)

The email should be titled as a complaint and set out the details of the complaint in full and what would be an appropriate resolution.

The SODCP Team will log the complaint on the Quality Escalation Log.

LTHT will acknowledge receipt of the complaint within two working days, and the complaint will be forwarded to an 'Investigating Officer' who has not been previously involved with the complaint. The Investigating Officer will be an appropriately trained person working locally with the site where the apprenticeship is being delivered.

The Investigating Officer will review all information submitted and meet with relevant members of staff to review the complaint. The Investigating Officer will also speak with the employer complainant to clarify facts where required. As part of the process, mediation may be offered to resolve the complaint. If mediation is offered, revised timescales for the resolution of the complaint will be agreed in writing between LTHT and the complainant.

A written response relating to findings of the inquiry will be issued by the Investigating Officer within a maximum of four weeks from the date of receipt of the original complaint.

If the employer complainant is not satisfied with the action taken, he/she may proceed to Stage 3 of the procedure.

### **Stage 3: Review**

Where the employers are not satisfied with the response provided at Stage 2, they should refer their complaint to the Head of School of Dental Care Professionals, using the email [leedsth-tr.SODNinfo@nhs.net](mailto:leedsth-tr.SODNinfo@nhs.net) and annotate it for the attention of the Head of School, who will review the investigation and the complaint.

The complainant can also request that the complaint is escalated for investigation by an independent reviewer. The reviewer will not re-investigate the complaint unless new evidence is presented. The independent reviewer will ensure that appropriate procedures are followed, the decision was reasonable, as well as considering any new evidence submitted.

Stage 4: Escalating Complaints to Education and Skills Funding Agency (ESFA)  
If after exhausting this process the complainant is still not satisfied, they can escalate their complaint to the Education and Skills Funding Agency (ESFA) [Complaints about post 16 education and training provision funded by ESFA - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/organisations/esfa)

## 4.1iv Apprenticeship and Employee Guidance Notes for the Appeals & Complaints Procedure

A study complaint is a specific concern about the provision of a programme of study or related education service e.g. delivery of teaching, availability of learning resources, final grading for each. For complaints of a non-study nature apprentices should also follow the process detailed below.

Any Apprentice has the right to appeal or complain against an assessment or internal quality assurance (IQA) decision if they believe that the decision is unfair or unreasonable. Apprentices are made aware of these appeals and complaints procedure at induction and the link to this policy is added to their commitment statement and is also referenced on our website.

<https://www.leedsth.nhs.uk/services/school-of-dental-care-professionals/>

It is the policy of LTHT to try and find solutions that make formal appeal unnecessary. To this end, it is the responsibility of the Apprentice, Assessor and the IQA to discuss objections to assessment decisions in an attempt to find a solution before the formal process of appeal is invoked. Apprentices wishing to appeal against assessment decision must do so in writing to the appropriate Programme Lead within **21 working days** following the assessment decision.

Should an apprentice have problems during their apprenticeship programme, they will be able to sort these out straightaway, in most cases, by talking them through with their tutor. However, it occasionally happens that there are serious grounds for dissatisfaction which can be dealt with only by someone other than the course tutor(s) concerned. If you, as an individual or as a group of apprentices, feel that the basic requirements of good teaching are not being met, or that there are other issues to do with the programme or its tutor(s) which give grounds for complaint, then this should be addressed through the LTHT Complaints Process detailed below. This process is also followed if you wish to appeal against the grade you achieved at the end of a unit.

### **Dissatisfied appellants and complainants on a LTHT Apprenticeship Programme who have exhausted the relevant LTHT procedures:**

If the complaint is judged to be justified you may wish to claim that it has affected your final assessment, in which case your complaint will be brought to the attention of the End Point Assessment Organisation after exhausting the LTHT procedure.

Alternatively, the complaint could be raised via the ESFA complaints website:  
[Complain about a further education college or apprenticeship - GOV.UK](#)

LTHT recognises that there will be a small number of cases where a mutually satisfactory resolution may not be achieved informally. Apprentices are entitled to make a complaint and The Apprentice Complaints Procedure, is in place to deal with such cases. Please remember that apprentices' right to express opinions is balanced by the responsibility to do so without being defamatory or derogatory to or about individuals whether online, in writing, or in person and in line with Apprentice Fitness to Practice

### **Informal Stage**

If you are considering making a complaint, in the first instance you should raise the matter informally with your tutor. If this is not appropriate you can contact any member of the SODCP team. Your complaint will be acknowledged within 2 working days and be resolved within 5 working days of acknowledgement. Where this timeframe needs to be extended you will be notified and told of the period within which we will have it resolved by.

We hope that the majority of complaints can be resolved informally without the need to use the formal process.

### **Formal Stage**

If after following the informal route you do not feel your complaint has been dealt with satisfactorily, or if you feel the informal route is not appropriate for your specific complaint, we ask that you follow a formal procedure by providing the following details:

1. Nature of the complaint
2. Date the matter occurred
3. Consequences for you as result
4. Remedy sought
5. Supporting evidence

When you have completed the complaints form please email it to [leedsth-tr.SODNinfo@nhs.net](mailto:leedsth-tr.SODNinfo@nhs.net)

### **Formal Stage actions**

1. We will acknowledge receipt of your complaint in writing within 5 working days, together with a copy of this procedure and include the following:
  - a statement of what they understand the complaint to be about

- the action they intend to take to investigate the matter
  - a date by which they expect to be able to respond to the complainant
2. Quality Assurance lead will then investigate the complaint. This may involve passing your complaint to the relevant Programme Lead who will review the complaint to identify the cause and may investigate or seek feedback where required from any associated teams, or indeed require further clarification from yourself.

Every attempt will be made to ensure that a level of confidentiality is maintained. However, the circumstances giving rise to the complaint may be such that it may not be possible to maintain confidentiality. Should this be the case we will inform you of this before we take action, unless there were exceptional circumstances, for example, where doing so could pose a risk of harm to you or others.

In the case of apprentices under the age of 18 raising a complaint, depending on the nature of the complaint, we may be obliged to inform their parent/guardian.

3. We will respond to you within 15 days of your complaint being acknowledged to let you know, in writing, if your complaint has been upheld or not. If further information is required or we are likely to exceed the 15 days response period, you will be informed of the status of your complaint and the period within which we will have completed any investigations.
4. If the complaint is found to be justified, the apprentice will be informed of any action which has been taken, or will be taken, in order to remedy the complaint. However, if the complaint is not upheld, the apprentice will be given reasons for the decision.
5. If an apprentice complaint gives rise to action under the staff disciplinary or poor performance procedures, the apprentice cannot be told what action, if any, was taken. They may only be told that appropriate action was taken. It may also be that the resolution or redress they were seeking is inappropriate. In this situation, it will be necessary for the SODCP team to provide support and guidance to the apprentice as appropriate.

At any stage during the process, you can try and resolve the complaint informally.

## Appeal Stage

If you are not satisfied that your complaint has been dealt with effectively you should advise us within 28 days of the date of the decision. We ask that you send the following details to [leedsth-tr.SODNinfo@nhs.net](mailto:leedsth-tr.SODNinfo@nhs.net)

1. Your original complaint and all reasons relating to this complaint.
2. The reasons why you are not satisfied with the outcome.

It will then be escalated to Head of School who will be responsible for convening the School Performance and Quality Improvement Group, which is made up of the following staff members (if appropriate):

- Head of School
- Appropriate Programme Lead
- Member of Triumvirate Team

Where it is not appropriate for the Head of School to escalate the complaint, the Quality Assurance Lead will do so.

Following the School Performance and Quality Improvement Group meeting, a member of the team will provide a written response within 28 days of receipt of the appeal. Please note this will be our final decision on the matter.

If you have any questions on our complaints procedure, please contact [leedsth-tr.SODNinfo@nhs.net](mailto:leedsth-tr.SODNinfo@nhs.net)

Following our appeal stage, if you wish to escalate your complaint you may contact the Education and Skills Funding Agency (ESFA). Employers may make a complaint either on their own behalf or on behalf of their apprentice where permission has been given.

Apprentices and their employers can contact the apprenticeship helpline regarding apprenticeship concerns, complaints and enquiries by calling 08000150400 or by emailing [nationalhelpdesk@apprenticeships.gov.uk](mailto:nationalhelpdesk@apprenticeships.gov.uk) in the first instance.

There is also additional guidance on complaints published by the ESFA on the GOV.UK website:

<https://www.gov.uk/government/publications/complaints-about-post-16-education-and-training-provision-funded-by-esfa>

You can also email your complaint to [complaints.esfa@education.gov.uk](mailto:complaints.esfa@education.gov.uk).

The SODCP team will keep a record of the complaint, in accordance with the provision of current Data Protection legislation, including:

- all documents submitted relating to the complaint.
- dates and notes of meetings held with all parties during the investigation of the complaint, including any actions to be taken.

## **4.2 Equality & Diversity**

## 4.2i Key Definitions

<b>Protected Characteristics</b>	Personal characteristics protected by the Equality Act 2010 as a result of the less favourable treatment experienced.
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## 4.2ii Aim

LTHT is committed to both eliminating discrimination and encouraging diversity amongst our workforce and apprentice learners whilst on our programmes. All employees, whether part-time, full-time or temporary, and apprentice learners will be treated fairly and with respect. Selection for employment, promotion, training or any other benefit will be on the bases of aptitude and ability will be decided by the apprentice's employer. A similar set of values will underpin the recruitment of learners to our programmes of training and study. All apprentices or employees will be helped and encouraged to develop their full potential and the talents and resources of the workforce will be fully utilised to maximise the efficiency of the organisation. To that end, the aim of this policy is to foster equality and fairness for all and those who deal with us. Through our LTHT culture, we aim to educate, inform and nurture best practise and behaviour in relation to Equality and Diversity.

## Language

Staff and apprentice learners each have a 'Code of Conduct' to which they are expected to adhere. These 'Codes' explain about behaving and communicating in a respectful way to all. Staff should endeavour to use neutral language which does not imply value judgements when referring to the protected characteristics. This applies whether the language is spoken, electronic or published. This is because use of language can imply attitudes which could be interpreted as negative or discriminatory. Staff should take care to demonstrate respect and be mindful of inappropriate references which may, albeit willingly, give offence to people who are members of groups which have historically been subject to bigotry or discrimination.

## Policy

Equal and fair treatment and protection from discrimination is a fundamental human right. LTHT believes that all forms of prejudice and discrimination are unacceptable. All staff and apprentice learners are expected to consider their behaviour and demonstrate respect for others.

## 4.2iii Protected Characteristics

## **Age**

LTHT is committed to ensuring that all staff and apprentice learners are treated fairly irrespective of their age. Age will not be a consideration in any decisions made concerning staff recruitment and selection, opportunities for promotion or training, appraisals, discipline or capability procedures or selection for redundancy. The opportunity to access education throughout life is a human right.

## **Disability**

We recognise that disabilities take many forms, both hidden and visible and welcome the definition of disability as set out in the Equality Act. LTHT is committed to identifying the disadvantages that disability causes and removing any consequent barriers to learning. Apprentice learners are asked during the initial assessment to notify us of any learning or disability needs so supportive measures can be implemented.

## **Sex**

Staff and apprentice learners are entitled to dignity and respect in the workplace and learning environment. We recognise that discrimination, whether direct or indirect, based on sex is unjust and it will not be tolerated. We are mindful of wider issues relating to the gender pay gap, under-representation of women in senior posts and gender segregation in employment and are committed to promoting gender equality in all our functions.

## **Pregnancy and Maternity**

We will not treat pregnant staff or apprentice learners less favourably or discriminate against them on the grounds of their pregnancy or maternity status.

## **Marriage and Civil Partnership**

We will not treat staff or apprentice learners less favourably or discriminate against them on the grounds of their marital or civil partnership status.

## **Race**

We seek to provide a learning environment in which staff and apprentice learners can develop their potential without any racial discrimination barriers. To this end, we will actively promote understanding and good relations between members of different ethnicities and nationalities. We encourage and expect all members of LTHT to evidence this commitment in their teaching and learning.

## **Religion & Belief**

LTHT does not promote any particular religion or belief but welcomes religious and cultural diversity and wishes to treat everyone's views with dignity and fairness. We therefore, uphold the principle that there is a human right to freedom of thought, belief and conscience. Atheists, humanists, agnostics and those of no belief have an equal right to respect for their beliefs or absence of belief as do religious adherents.

The right to manifest such thoughts and beliefs are, however, qualified by the need to protect the rights and freedom of others. LTHT acknowledges that some general holidays are based around the Christian calendar and that some holy days of other religions may coincide with timetables. Apprentice learners should inform a member of staff at the beginning of the course of any request for reasonable accommodation. Where practicable during breaks, facilities can be booked for activities to meet the religious and cultural needs of staff and apprentice learners on the understanding that other staff/apprentice learners are neither pressurised to join in or made to feel excluded.

## **Sexual Orientation**

We welcome the opportunity afforded by legislation changes to ensure practises are equal and fair for all four legally protected orientations, namely bisexual, gay, heterosexual and lesbian. We will tackle discrimination and promote equality for staff and apprentice learners, relating to policy, practise and ethos.

## **Gender Reassignment**

LTHT recognises gender differences and individuality and that there can be differences between sexes assigned at birth and gender identity. We recognise that some people may have a specific identity that they want to follow through choice. We will not discriminate against people on the ground of gender variation at any stage in the process of gender reassignment, whether proposing to undergo, commenced, partial or complete. We will take positive steps to combat unlawful discrimination and harassment on these grounds.

## **4.2iv Implementation**

### **Monitoring**

The impact of our Equality and Diversity initiatives will be monitored through measures such as:

- Teaching and learning objectives.
- Feedback from apprentice learners and staff by means of surveys or other measures of attitudes and opinions.
- Analysis of complaints and incidents arising.
- Collecting and using data and information to evaluate Equality and Diversity progress in our provision on learner admission, retention, progress and achievement.
- Analysis of recruitment and selection (onto our programme) monitoring forms

## 4.2v Roles & Responsibilities

### **School of Dental Care Professionals (SODCP)**

SODCP is responsible for implementing the Equality and Diversity policy and ensuring that it complies with current statutory requirements. They have responsibility for ensuring that LTHT complies with the requirements of the Equality Act:

- Eliminate unlawful discrimination, harassment, and victimisation and other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

They are responsible for achieving high standards in teaching and learning and we recognise that access and inclusivity is essential to this aim. Learning resources will be free from racist, sexist and any other prejudiced assumptions, images and language and actively promote diversity. We will take steps to develop staff in the best teaching and learning practises, ensure that their best practise is promoted and shared, and policies and practises reflect the principles of equality. Breaches of the Equality and Diversity policy can be regarded as misconduct leading to disciplinary proceedings.

LTHT is committed to:

- Creating an environment in which individual differences and the contributions of all our staff are recognised and valued.
- A working environment that promotes dignity, fairness and respect to all.
- Intolerance of all forms of intimidation bullying or harassment.
- Making training, development and progression opportunities available equitably;
- Understanding that equality in the workplace is good management practise and makes sound business sense.

### **All Staff**

It is the responsibility of all staff to ensure that Equality and Diversity is at the heart of our functions and services.

All staff have a responsibility to:

- Participate in annual training to continually improve their knowledge of the equality and diversity agenda included within which is the mandatory reading and acknowledgement of this policy'.

- Challenge discriminatory incidents reporting those of an equality nature through our procedures.
- Keep up-to-date with legislation and participate in training and learning opportunities.
- Reflect the values, principles and standards described in this policy.

**Notes:** To get engagement, all apprentices are given access to this policy as part of their induction and are informed on how they can raise Equality & Diversity (E&D) complaints/ issues/ comments either to us as the training provider, or to the ESFA or Apprenticeship Service. Learners are required to sign induction documentation to confirm they are aware of this policy and how to raise issues. Every learner receives 8-12 weekly progress reviews whilst on programme during which any issues pertaining to E&D can be raised and discussed. All issues or complaints are dealt with as per our learner complaints policy and are immediately raised, discussed, risk assessed and acted upon in our School Performance and Quality Improvement Group.

All apprentice learners that join our Apprenticeship training programmes are required to complete the required ESFA apprenticeship documentation which contains an E&D section to be populated. This documentation also requires the apprentice learner to make known any disability or learning needs they have to ensure appropriate support can be provided.

E&D surveys are circulated periodically.

All staff and apprentice learners are expected to complete the required mandatory training for E&D and our delivery teams will request evidence from the apprentice's employer as assurance this has been completed and a record of completion kept on file.

E&D is embedded in all curriculums delivered to apprentice learners and is also included in their 1-1 discussions in progress reviews to ensure all learners are aware and engaged with this agenda.

LTHT have an Equality Impact Assessment Toolkit/guidance available to identify whether there will be an adverse impact for anyone who may have one of the legally defined protected characteristics should a change in service provision be required.

## 4.3 Health & Safety

### 4.3i Key Definitions

<b>Risk</b>	An uncertain event or set of events, that should it occur, will have an effect on the achievement of objectives. A risk is measured by the combination of the probability of a perceived threat or opportunity and the magnitude of its impact on objectives.
<b>Risk Assessment</b>	The process used to evaluate the risk and to determine whether controls are adequate or more should be done to mitigate the risk.

### 4.3ii Purpose

The purpose of this policy is to set out how LTHT is fully committed to promoting the health, safety and welfare of all staff and learners. The Execs of LTHT will provide the leadership to ensure that exemplary health and safety practices are firmly embedded throughout the organisation to provide a secure and healthy environment in which to work. This policy is issued in accordance with the duties imposed under the Health and Safety at Work Act 1974 (HASWA).

It is the policy of LTHT that no one will be discriminated against on grounds of, age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity leave, race (including colour, nationality, ethnic or national origin), religion or belief, sex or sexual orientation.

LTHT will provide interpretation services or documentation in other mediums as requested and necessary to ensure natural justice and equality of access.

We owe a duty of care to all staff, apprentices, visitors, employers and other stakeholders.

In order to discharge this duty, we take steps to ensure working and learning environments are safe with risks to health being reduced to a minimum or eliminated. These steps include:

- Local fire and H&S risk assessments carried out by trained H&S staff
- Well-designed, user-friendly documentation.

- Robust action plans
- Staff awareness & training initiatives
- H & S being a standing agenda item at the School Performance and Quality Improvement Group and Executive meetings
- H & S training delivered to apprentices
- Robust vetting & approval process for subcontractors
- H & S being part of apprentice 8-12 weekly progress reviews
- Common sense at all times
- An annual review of the policy

This policy applies to those members of staff and learners that are directly employed or trained by LTHT and for whom LTHT has legal responsibility. For those staff covered by a letter of authority/honorary contract or work experience the organisations policies are also applicable whilst undertaking duties for or on behalf of LTHT.

### **4.3iii ROLES & RESPONSIBILITIES**

#### **Chief Executive**

The Chief Executive has overall responsibility for the Health, Safety and Wellbeing of all patients, staff, contractors, members of the public and other persons who may be affected by the activities of the Trust. This objective will be achieved through the development and successful implementation of the Trust's Health and Safety Management System (SMS)

#### **SODCP Governance**

Will ensure health and safety management is successfully implemented and included within their governance and performance monitoring forums this will be achieved by ensuring Health and Safety is a standing agenda item on the SODCP governance and performance meetings.

SODCP is required to develop, consult and communicate a local Health and Safety Implementation Plan, which describes their safety management system to ensure compliance with all legal requirements and policy/procedural requirements.

The SODCP Health and Safety implementation plan will be reviewed and approved through the governance arrangements established.

In the event that the SOCDP monitoring and performance management arrangements identify risks that may lead to non-compliance with legislation and

Trust Policies, actions will be implemented to address this to achieve compliance. If significant risks are identified they will be escalated and described on the Risk Register, together with actions that are being taken to mitigate the risk.

SODCP will review their annual Health and Safety Controls Assurance findings through their governance and performance forum and develop action plans to address areas for improvement. Local managers are required to consult with all staff when Health and Safety improvements are being planned and implemented in addition to the results of Active Monitoring e.g., Health and Safety Controls Assurance process outcomes.

### **Head of SODCP**

Reviewing and approving this policy and ensuring compliance via the Strategic Apprenticeship Review Group and LTHT Policy and Procedures Team.

### **Apprenticeship Programme Managers**

Responsible for H&S in their delivery location and is the first point of contact. Keep staff & learners informed of H&S updates/changes. Review the learning & working environment in training centres and work with colleagues to bring about the necessary changes/ improvements. Carry out maternity risk assessments and risk assessments for people with disabilities and/or specific learning differences. Help develop better processes & shape policy.

### **All employees**

Share a collective responsibility for ensuring we offer safe environments to all staff/ apprentices/ visitors.

All LTHT staff including delivery staff and apprentices are issued with this policy and are made aware of how to raise H&S concerns. This policy is stored on shareable platforms and can be made available to anyone, at any location at any time. All apprentices are required to sign induction paperwork that confirms they acknowledge this policy. These steps ensure that this policy is fully promoted, and all our staff involved in delivery and our apprentices are committed to this policy and its objectives and are aware of how to implement it during a H&S incident.

All NHS apprentices and tutors are required to undertake H&S training or H&S Basic Awareness linked to their level of operation and training competencies as specified in their Employer Trust.

The apprenticeship team ensure checks are carried out to ensure our apprentices and Tutors complete their mandatory training. All LTHT staff are made aware during their mandatory training how to implement this policy and report an incident.

All employees and those detailed in the Scope of this policy have a duty under Section 7 and 8 of the Health and Safety at Work etc Act 1974, specifically:

- Developing people for health and healthcare
- to co-operate with LTHT's health and safety requirements and statutory health and safety at work obligations.

- comply with all lawful instructions given to them to ensure their safety and the safety of others.
- not to endanger themselves or others by their ‘acts or omissions’ (i.e. what they do, or don’t do)
- bring to the attention of their line manager any defective equipment or potential health or safety hazard, or any practice likely to cause an accident or incident;
- document all incidents (including near misses), using the LTHT incident reporting system.
- observe all procedures laid down concerning processes, material or substances.
- keep work equipment in good condition, and report defects to the supervisor or manager.
- attend / complete, as directed, any statutory or mandatory or other health and safety training appropriate to their role.
- observe and comply with the fire prevention and evacuation procedures and be familiar with the position of their departmental fire equipment and fire exits and
- must not interfere with or misuse equipment provided in the interests of health and safety.

#### **4.3iv RISK ASSESSMENT and RISK MITIGATION**

LTHT is committed to ensuring that staff remain safe at all times when completing any work tasks both within our offices and when they are working from home.

LTHT has a range of self-assessment tools, checklists, and risk assessment templates which staff can use (along with their Line Manager) to ensure that any element of risk or potential danger is highlighted and removed.

We would actively encourage all staff to complete the working from home checklist and risk assessment with their Line Manager to ensure that home working is safe. LTHT is committed to ensuring that all of our premises are safe for colleagues to work in. Each property is risk assessed by an Independent Risk Assessor in relation to both overall health and safety and fire safety.

#### **4.3v MANAGEMENT OF HEALTH & SAFETY**

Apprentices in Delivery Locations:

Are introduced to premises layout, health & safety requirements, emergency and first aid procedures during induction.

Are introduced to the concept of “safe working” in readiness for work experience or employment. This concept is embedded throughout their time with us.

#### **Apprentice Trips / Outings**

For accompanying apprentices on trips/outings, the ratio is 1 staff member to 15 apprentices (maximum). 2 staff members are required for accompanying between 16 and 30 apprentices.

Risk assessments are undertaken and steps taken to reduce any identified risks.

### **Accident, Near Miss and Ill-Health Reporting Procedure**

All accidents, near miss, incidents and ill-health and concerns are recorded via the agreed mechanism within LTHT, Datix. Those resulting in serious injury are reported immediately to the SODCP Triumvirate team. Serious accidents/incidents are reported to the ESFA & local authority (if SODCP appropriate) via our ESFA Contract Manager.

Our ESFA Contract Manager will also be informed within 10 days of the incident. All accidents & near misses are recorded on to a database for review by the H & S Rep. Reports are compiled and reviewed at School Performance and Quality Improvement Group meetings every quarter, with action taken to reduce/eliminate risks as appropriate. Action needed is channelled via School Performance and Quality Improvement Group Meeting to Apprenticeship Programme Managers.

The ill-health of apprentices is also reported and consideration given to contagion and cause, including factors to mitigate symptoms.

### **Staff Training**

We ensure that staff are trained to implement this policy in various ways. These include training during staff induction, involving them in risk assessments, specific H&S qualifications for those undertaking risk assessments, H&S as an agenda item in School Performance and Quality Improvement Group Meeting and executive meetings, delivery location risk assessments being visually displayed and discussed in team meetings, refresher training, First Aid training and an annual policy review.

### **Lone Workers**

Lone workers are categorised as staff working within a delivery location separately from others (e.g. isolated training room) or those who are mobile working away from their deliver location or those staff working from home or those staff not attending staff training days.

It is our policy to give instruction & training to such staff which minimises or eliminates the risk of danger or harm.

All staff are asked to accept that they have a responsibility to take reasonable care of themselves. The risk assessment is evidenced in writing and retained at delivery location level.

### **Health & Well-being**

LTHT are committed to improving the health and well-being of their employees. We have several well-being programmes and benefits that are aimed at reducing sickness absence, improving employee well-being and promoting a work-life balance.

## **Maternity**

A risk assessment of the employee's/apprentice working environment is carried out by the Apprenticeship Programme Manager (copy sent to HR):

- immediately we are formally informed of the pregnancy
- at mid term
- on return to work

The health & well-being of the “mum to be” is regularly monitored by the line manager and apprenticeship programme manager throughout the pregnancy and adjustments made as necessary.

## **Disabilities and/or Specific Learning Differences**

Risk assessment completed by the Line Manager/HR/Apprenticeship Programme Manager when informed that a member of staff/apprentice has a disability and/or specific learning difference:

- Working Practices – Any reasonable adjustments are evidenced in the apprentice file
- Reviewed as a minimum annually, but more frequently if deemed necessary
- Apprentice assessment is kept on the apprentice file. Staff assessments are sent to HR Manager, with a copy retained by the Line Manager

## **Fire Drills & Evacuation**

- All delivery locations have a trained Fire Marshall who takes responsibility for co-ordinating evacuations. The identity of whom is displayed prominently in reception areas and at gathering spots.
- The evacuation procedure and meeting point is displayed prominently in all areas.
- The fire alarm is tested weekly by the landlord/building managers/delivery location staff.
- Dry run evacuations are conducted routinely in line with LTHT fire policy• Disabled evacuees – evacuation apparatus is provided where necessary. When the evacuation is dependent on stairs “safe zones” in close proximity to the delivery location are established. Evacuees are to be positioned here to await the help necessary to have them removed from the building. To be accompanied by a member of staff at all times.
- Visually impaired – will be accompanied by a member of staff at all times and receive clear verbal instructions.
- Hearing impaired - will be accompanied by a member of staff at all times and receive clear physically noticeable gestures.

**Hostile Attack – see ‘Hostile Attack Procedures’**

The most likely scenario for a hostile intruder/s at LTHT are intruders who have intentions of injuring a person(s) they know and could already be at LTHT (i.e. another apprentice or member of staff). This situation would be dealt with locally with assistance from the police. In this situation every attempt must be made to keep the assailant(s) and the intended victim(s) apart and keep the assailant(s) out of LTHT premises/rooms. A lock-down situation is NOT necessary in these situations unless events escalate and mass casualties become likely.

### **Bomb Threat / Unidentified Item**

In the event of a bomb threat (verbal or written), the building alarm is raised and the evacuation procedure followed, with emergency services informed immediately. All mobile devices are switched off. Where possible evacuation is via a route with limited amounts of windows/glass. The fire evacuation meeting point is sufficiently far enough away from the building for person safety if the bomb were to detonate.

In the event of finding an unidentified item, the emergency plan followed is in proportion to the level of risk. The risk is assessed by staff, and if in any doubt the above procedure is followed.

### **First Aid**

All delivery locations have a first aid box with a standard range of supplies positioned in a prominent place known to all staff.

All delivery locations have a first aider who is appropriately qualified or working towards an appropriate qualification. The identity of the first aider is displayed prominently in the reception area and gathering spots.

### **Visitor Policy**

LTHT has a duty of care to protect visitors in the same way that staff and apprentices are protected, to ensure the health, well-being and safety of all. We expect all visitors to work in accordance with the same guidelines and principles to protect learners. The Visitor Policy and Protocols confirms this.

### **Young Persons Regulations**

The above was introduced into the Management of Health and Safety at Work Regulations in 1997. These Regulations were introduced to protect the health and safety of young people at work / identify and reduce risks, as far as reasonably practicable, which particularly apply to young workers i.e., under 18 years, because of their possible lack of awareness of existing and potential risks, immaturity and inexperience / ensure young people receive proper supervision by a competent person.

### **Equipment, Materials and Safe Systems**

Should apprentices require replacement of any PPE (Personal Protective Equipment) (shoes, overalls, goggles etc.) or the issue of any additional safety equipment they should contact their Employer as per ESFA funding rules.

### **Manual Handling**

Each Organisation has carried out Risk Assessments on the workplace including offices, workshops etc these include manual handling and associated risks and how they can be reduced. Apprentices should make themselves aware of the current procedures.

### **Contractual Controls**

Any omission of safety provisions may be considered 'wilful misconduct' and may result in disciplinary action.

### **Dress Code**

It is the individual responsibility of all employees/apprentices to present themselves in a way that is not going to give offence nor lead to any difficulty with safety and prevention of infection standards within the NHS.

### **Health & Safety Competent Advice**

The provision of Health & Safety competent advice is facilitated by the LTHT Developing people for health and healthcare Estates and Facilities Management Lead through the use of external providers as appropriate.

### **Equality Impact Assessment (EIA)**

Under the Equality Act, the need for public bodies in England to undertake or publish an equality impact assessment of their policies, practices and decisions was removed in April 2011 when the 'single equality duty' was introduced. Public bodies must still give "due regard" to the need to avoid discrimination and promote equality of opportunity for all protected groups when making policy decisions and are required to publish information showing how they are complying with this duty.

## 4.4 Learning & Development

### 4.4i Key Definitions

<b>Mandatory Training</b>	Compulsory training that is determined by an organisation for the safe and efficient delivery of services. This type of training is designed to reduce organisational risks and comply with local or national policies and government guidelines
<b>Study Leave</b>	This is a pre identified time away from the work area for the purposes of gaining new knowledge and skills. This includes informal learning such as shadowing other services with the purpose of gaining new knowledge or time away from work to research evidence to support new/current practices. It may or may not include the approval of funding for a course or approval of a course application.

At LTHT we encourage everyone in the organisation to take an active role in developing their own competence and skill to improve their contribution to service delivery. We fully support learning and development activity which will benefit staff working in roles across the organisation and help to develop and retain valuable skills and talent within the wider NHS workforce.

We recognise that members of staff have different styles of learning and are motivated by different types of development. Therefore, members of staff are encouraged to think creatively and flexibly in relation to their personal development, as well as considering the more traditional methods 'training' and learning.

LTHT will provide members of staff with:

- A positive working environment, promoting a supportive open culture that enables them to reach their potential.
- Clear roles and responsibilities, providing rewarding jobs for teams and individuals that make a difference to patients, their families and carers and communities.
- Personal development, access to appropriate training for jobs and line management support to succeed.

## 4.4ii Purpose

LTHT is committed to investing in the development of all members of staff to create a learning organisation which supports the delivery of the Learning, Education and Training Strategy and ultimately improves patient care. It also recognises that a commitment to learning and development is paramount in the motivation and retention of members of staff.

This policy applies to all LTHT members of staff. As a fair and equitable employer, we will ensure appropriate access to learning and development activities including, where appropriate, formal education which results in a recognised qualification, coaching, mentoring, secondments, conferences, technology enhanced learning and other in- service training as appropriate.

Staff on secondment into LTHT and those working for LTHT on temporary contracts are not included in the scope of this policy. If the development need identified is integral to the delivery of the limited term project, they are working towards delivering, the manager/budget holder may consider a development activity is appropriate.

## 4.4iii Roles & Responsibilities

### Members of Staff responsibility

Every member of staff should aim to engage in any training and development opportunities provided over and above those legally required of their post. In addition, each member of staff is responsible for:

- Planning; thinking about their aspirations and what skills they need to achieve them.
- Completing all mandatory training that is required.
- Maintaining excellent performance standards as an individual and as part of a team by identifying any skills gaps and knowledge gaps and activities to keep sector expertise and teaching/training skill and knowledge up to date to support Continuous Professional Development and addressing them in a timely manner to ensure they are equipped to carry out their roles effectively.
- Getting involved in 'stretch' projects that will challenge them and allow them to work with staff outside their team.
- Providing honest and constructive feedback and evaluation on any development activities.
- Sharing any learning and new skills with colleagues and teams within their office and across the organisation where appropriate and possible.
- Keeping their personal development record up to date using the appropriate platforms e.g., ESR.

Mandatory training is a contractual obligation for each member of staff, and it is the member of staff's responsibility to ensure they are compliant in each of the relevant competencies.

Teaching/training staff are expected to:

Maintain an up-to-date Continuous Professional Development (CPD) log. This is an expectation of external bodies such as Ofsted and the ESFA to ensure LTHT is continuously developing our employees that deliver training.

Keep their sector expertise up to date through application of this policy. Sector expertise can be updated through a variety of means including qualifications, training sessions, workshops, conferences, events.

Keep their teaching and training knowledge and skills up to date through application of this policy. Teaching and Training knowledge and skills can be updated through a variety of means including qualifications, training sessions, workshops, conferences, events.

Ensure their registration is revalidated as per the official body stipulations.

### **Management responsibility**

Managers are responsible for:

- Ensuring that there is a positive working environment within their team, promoting a supportive open culture that enables members of staff to reach their potential.
- Carrying out appraisals and personal development planning within the required timescales for members of staff in the manager's team.
- Ensuring that staff undertake the mandatory training required and that they create the necessary environment for this to happen.
- Monitoring employee professional development and ensuring all requests are fully supported and applied as per this policy
- Supporting members of staff within their team with personal development, access to appropriate training for jobs and line management support to succeed.
- Developing clear roles and responsibilities within their team, department, CSU providing rewarding jobs for members of staff that make a difference to patients, their families and carers and communities.
- Ensuring that they are open and fair in identifying, considering and, where appropriate, agreeing requests to support Learning & Development.
- Managing the workload within the team to support members of staff when development activities are being undertaken.
- Helping individuals transfer their new learning (understanding, knowledge, skills and confidence) to their everyday work.

- Keeping records of development activities up to date using the appropriate platforms.
- Undertaking assessments of Learning & Development needs and/or opportunities within their team, department or CSU and discussing these with the HR Business Partners.

### **HR responsibility**

HR is responsible for:

- Ensuring this policy is applied consistently and fairly across the organisation through coaching and developing managers in policy implementation.
- Ensuring that the agreed core offer of learning is made available across the organisation and in a variety of learning formats.
- Providing the platform through which members of staff can access learning and development opportunities and maintaining records.
- Identifying and facilitating the provision of potential future development opportunities and needs within the organisation, utilising the correct governance process to scope and procure them where necessary.

### **Mandatory Training**

Mandatory training is undertaken via the learning platforms available to staff which are currently ESR and e-learning for Health.

### **Study Leave Allowances**

It is important that members of staff are provided with time and support to successfully complete education and training that is funded by LTHT.

Up to five (5) days of study leave per study year will be available per member of staff, including exam dates. This will be subject to approval by the line manager and subject to the requirements of the service.

A member of staff may request study leave for a development activity which is not funded or sponsored by LTHT (i.e., Self-funded). If the development activity meets the criteria, the manager may approve up to five (5) days of study leave per year.

When the development activity and duration of that activity is agreed with the individual and manager, it is understood and accepted that the agreed time is required to complete this.

Time for development activities is granted at the discretion of the line manager for the purpose of learning and development.

### **Travel and Subsistence Expenses for Development Activities**

Reimbursement of approved travel expenses will be in accordance with LTHT's Travel, Subsistence & Expenses Policy. Travel expenses are deducted from

departmental budgets. Groups of members of staff attending the same course at the same time should share transport wherever possible.

Travel and subsistence costs are reimbursed at lease car or mileage rates outlined in the Agenda for Change Terms and Conditions Handbook. Members of staff will be expected to use the lowest fare available on public transportation to attend development activities.

### **Non-attendance (Cancellations and Failure to Attend Without Notification)**

If a member of staff is unable to attend their development activity, they should contact the organiser as soon as possible (internal or external) and notify their line manager.

For all internal courses the reason for non-attendance will be requested. In the event of a member of staff not attending a course for which they have booked, their line manager will be advised.

For all external development activities, the member of staff should be aware of the cancellation terms before confirming their booking.

The organisation recognises that, on occasion, cancellation of attendance is unavoidable. Decisions to cancel (if not illness or personal issue) should be balanced against service need, and individual skill development.

## 4.5 Safeguarding

### 4.5i Key Definitions

<b>A child</b>	A child is defined as anyone under the age of 18
<b>An adult at risk (previously vulnerable adult)</b>	Is defined as any person over the age of 18 and at risk of abuse or neglect because of their need for support or personal circumstance

### 4.5ii Purpose

LTHT recognises that as a Main Provider of Apprenticeship programmes we have a responsibility to safeguard all apprentices who are children or adults at risk.

The aim of the policy is to ensure that local Trust site trainers and all other staff and all apprentices on programme are aware of and understand their responsibilities, the responsibilities of others, and for signs that there might be a Safeguarding concern, along with the reporting procedures for all Safeguarding issues.

While in the course of undertaking the 20% off the job training, local Trust site trainers and/or other staff may learn of issues appertaining to Safeguarding and where this arises a procedure is in place to ensure they fulfil their duty of care to the apprentice.

LTHT recognises that an apprentice and some of the local Trust site trainers have employed status and as such the policy also references the employers' responsibilities for Safeguarding.

This policy is based on the following principles:

Effective and accurate identification, assessment, and management of risk.

Safe recruitment, selection and development of staff and apprentices.

The welfare of apprentices is paramount, and individuals are treated with respect and dignity. Apprentices are entitled to privacy; protection of the law and have their rights upheld regardless of ethnic origin, gender,

sexuality, impairment or disability, age, class, religious or cultural background.

Roles and responsibilities for Safeguarding are clearly identified.

Guidance, training and support is provided for staff and apprentices.

The apprentice is informed when disclosures are reported to the Designated Safeguarding Officer (Apprenticeships Programme Lead), where it is safe to do so.

Information about concerns is shared with appropriate individuals and agencies who need to know.

Safeguarding is the protection of apprentices, and, in this case, appertains specifically to apprentices who are at risk from abuse and neglect, promoting health and development, ensuring safety and care, and ensuring optimum life chances.

### **The Legal Context**

LTHT will work with all apprentices on programme and the apprentice's Employer to act in accordance with relevant legislation and statutory guidance.

### **Promotion of and commitment to this Policy and Procedure**

LTHT and the apprentice's employer will promote and publicise the Safeguarding Policy as widely as possible using the relevant sites document storage system, websites, apprentice induction guide, learner handbooks and reports.

Apprentices will also be required to refer to their employer's Safeguarding policy and complete all employer mandatory Safeguarding training requirements.

All LTHT staff including delivery staff and apprentices are issued with this policy and how to raise a concern.

This policy is stored on shareable platforms and can be made available to anyone, at any location at any time.

All apprentices are required to sign induction paperwork that confirms they acknowledge this policy. These steps ensure that this policy is fully promoted, and all our staff involved in delivery and our apprentices are

committed to this policy and its objectives and are aware of how to implement it should a concern be identified.

## **Eligibility**

This policy applies to all apprentices, LTHT and associated staff involved with apprenticeship training operations and delivery.

## **Policy relating to apprentices whilst completing OTJ training.**

In the case of a safeguarding issue being raised whilst an apprentice is completing their 20% off the job learning the following processes should be followed:

We all have a responsibility to ensure that apprentices at risk are:

protected from harm,

informed about potential risks to their welfare,

understand how to seek help and to ensure any concerns are dealt with in a timely and appropriate fashion, in line with best Safeguarding practises,

providing support as soon as a problem emerges.

We also have a responsibility to minimise the risk of allegations against local Trust site trainers and other staff.

All staff and local Trust site trainers are expected to comply with any Disclosure and Barring Service (DBS) check request.

All staff and local Trust site trainers are expected to have a good understanding of what constitutes a Safeguarding or welfare concern and how to provide support or guidance and the channels for escalating a concern. It will also ensure that they can identify the Designated Safeguarding Officer (DSO) for LTHT apprenticeship programmes and the local Trust site DSO.

We will ensure that all arrangements with local Trust site trainers clearly set out their Safeguarding obligations.

We will ensure that all arrangements with the apprentices' employer identifies who to contact so that we can understand how the employer meets their Safeguarding obligations for their apprentices.

Local Trust sites will provide initial induction, on-going training and information to proactively promote Safeguarding awareness and support all staff and local Trust site trainers to understand their individual responsibilities.

It is a requirement that all training staff undertake the mandated NHS Safeguarding & Prevent training. They will be required to submit evidence of their CPD in the area of Safeguarding and Prevent.

We will ensure our Safeguarding & Prevent policies are shared and information on welfare and well-being is provided during the apprentices' on-boarding and induction. It will also be included as a standing item within the programme delivery reviews as part of the review process to ensure ongoing awareness.

Apprentices will be required to complete the mandated NHS Safeguarding & Prevent training and provide evidence to show completed for their portfolio.

The Designated Safeguarding Officer (DSO) for Apprenticeship programmes is assigned to the role of the Widening Participation and Apprenticeship Lead who is trained to level 3. In their absence, a suitable proxy will be assigned. Should a local Trust site trainer or employee of LTHT have a concern regarding the Safeguarding of an apprentice they should report their concerns to their DSO.

The DSO of LTHT has an obligation to report any concerns to the DSO at the apprentices' employer and to the DSO at the local Trust site. If a Trust site DSO becomes aware of a safeguarding issue relating to either an Apprenticeship Programme or an apprentice, they will report any concerns to the LTHT Apprenticeship DSO.

The same is true if any employee or a local Trust site trainer has a concern regarding a colleague or other professional.

Enquiries and Investigations; where outside agencies are involved in any Safeguarding incident or reported issue, we will, when required to do so, liaise and provide information to relevant authorities, whilst ensuring that the apprentice is kept informed, where it is safe for them to be so. LTHT, the local Trust site and the apprentice's Employer will collaborate on and with any enquiries and investigations and will work jointly where an investigation crosses organisational boundaries.

Data collection, storage and sharing of records of Safeguarding incidents will be retained in a safe place, together with a written record of outcomes.

All data shared between the apprentices' employer, local Trust site trainers and LTHT will be treated as confidential, unless there is a requirement to share with the appropriate local authorities, such as in a Safeguarding concern. No data shall be used in ways that might discriminate against any apprentice, local Trust site trainer or LTHT employee.

The policy and any incidents arising appertaining to Safeguarding will be monitored on an ongoing basis by the Apprenticeships Programme Lead and overseen by the Executive Director of LTHT.

We will review our Safeguarding and Prevent duty policies and supporting processes annually. This will include an annual assessment of the potential risks and the context and level of Safeguarding risk posed by our work as a provider of apprenticeship training. This will feed into our risk assessment process and risk register so that we understand and can manage how we mitigate Safeguarding risks.

### **LTHT Apprentice Safeguarding Reporting Procedure**

The process outlined below details the steps involved in raising and reporting Safeguarding concerns.

Once reported to the Designated Safeguarding Officer (DSO) of LTHT (the Apprenticeships Programme Lead) the process continues to the investigation stage and lastly, if necessary, to the referral stage.

At any of these three stages, if we deem it appropriate and safe to do so, we may pass the information to the apprentices' employer.

Prior to any apprentice starting with us we will ask their employer to provide the contact details of their Designated Safeguarding Officer or lead. This process must be followed at all times.

The trainer must communicate their concerns to their Designated Safeguarding Officer; to the DSO of the apprentice's employer and to the DSO of LTHT as soon as possible.

- Seek medical attention for the Apprentice if needed.
- DSO on site to take any immediate steps to prevent any further danger to the apprentice (in the case of an emergency incident)
- Local Trust site trainer to make accurate notes to record an incident or conversation. (This is important as the local Trust site trainer may need to refer to them later)
- Complete the Safeguarding Referral Record Form as fully as possible (local site documentation to be used)
- Completed forms to be passed to the DSO on site (and a copy to be sent to LTHT and the apprentice's employer DSO)
- Upon receiving a report of a Safeguarding concern, the DSO reviews the written statement and conducts an investigation, if required

- A lead investigating officer will be identified - the findings of an investigation will be shared with the DSO in LTHT, the local trust site and apprentice's employer.
- Discuss with the parents of an apprentice if under 18 years of age if it does not endanger them and if it is safe to do so; OR Discuss with the vulnerable person (and their carer if appropriate) - if it does not endanger them and if it is safe to do so.
- Obtain permission to make referral if safe and appropriate.
- DSO to take appropriate steps which may include, referral to outside agencies or the apprentices' employer or other organisations and/or disciplinary action.
- Review LTHT SG policies and how the child as staff element can be incorporated.

### **Informing apprentices about how to raise a Safeguarding concern**

During apprentice induction or engagement days, LTHT will provide information about how to raise a Safeguarding concern.

Induction includes the sharing of our Safeguarding and Prevent policies, information about how to stay safe online, information about apprentice behaviour strategy and discipline procedure, reasonable adjustments and fair access, equality, diversity and inclusion and anti-bullying awareness.

This is reinforced at regular progress review meetings. By covering these subjects together at induction, we aim to reduce the occurrence of Safeguarding issues.

All apprentices are required to complete and sign all induction documentation which includes acknowledging receipt of this policy.

### **Apprentice reporting Safeguarding concerns about another apprentice**

Should an apprentice report a Safeguarding concern regarding another apprentice LTHT will always take the issue seriously. The person receiving the information should still follow the above process.

### **Allegations against employees or LTHT trainers**

LTHT recognises its duty to report concerns or allegations against its employees or trainers (paid or unpaid) within the organisation or by a professional from another organisation.

Professional boundaries are what define the limits of a relationship between a trainer and an apprentice. There are a set of standards we agree to uphold that allow this necessary and often close relationship to exist while ensuring the correct detachment is maintained. This will be discussed with employees upon recruitment and at induction and as part of their annual appraisal and be in line with the LTHT process.

### **Confidentiality**

Information will be gathered, recorded, and stored in accordance with the Data Protection Policy and GDPR policy.

All employees must be aware that they have a professional duty to share information with other agencies in order to safeguard apprentices.

Safeguarding apprentices may override confidentiality interests. However, information will be shared on a need-to-know basis only, as judged by the Designated Safeguarding Officer.

### **4.5iii Roles & Responsibilities**

#### **Learner Support**

The purpose of learner support within is to:

- Enhance the overall (physical, psychological, and social) well-being and opportunities for success of all learners in the context of their academic studies.
- Enable every learner to build sound relationships with other learners, within clinical departments and within the institute, so contributing to a sense of belonging.
- Enable learners to develop life skills as they progress through the programme.
- Contribute positively to the quality of the learner experience and to support recruitment, progression, and retention.
- Enhance the reputation of The School of Dental Care Professionals in relation to its learner support.

Equality of opportunity - As a learner within the School of Dental Care Professionals, learners have a right to:

- Fair practices and behaviour
- Equal access to assessment and support
- A workplace that is free from unlawful discrimination, harassment, or bullying (including IT/social media)
- Fair processes to deal with complaints and grievances

Learner support is necessarily and appropriately a partnership activity, with the following key players providing a range of complementary services to enhance the learner experience.

- School of Dental Care Professionals – Personal Tutor
- School of Dental Care Professionals –Programme Manager
- Clinical Departments / Laboratories
- Occupational Health
- Employee Assistance Programme
- Trust Health and Wellbeing service
- Able Futures

Any Additional Learner Support to be documented and stored in learners' personal file.

### **Personal Tutor**

The personal tutor is responsible for the teaching and assessing of the learner and is the named contact fulfilling a defined set of core duties, including acting as a first point of contact.

The personal tutor completes reviews every 8 weeks as per the review timetable and using the review proforma.

When completing the review the personal tutor will discuss the following with the learner:

- Exams /assessments completed
- Progress of functional skills (where necessary)
- Referring to the learners electronic / portfolio identification of planning and targets reached
- Attendance
- Clinical / laboratory feedback
- Theoretical progress

- Knowledge of E&D, Safeguarding, Prevent and British Values
- Pastoral care

Records of pastoral care to be documented on Pastoral Care form and completed forms stored in personal file.

A RAG rating is identified for the learner.

Each score indicates the support needs of the learner.

RAG rating	indicators	Support
GREEN	All target met No needs identified	Review in 8 weeks
AMBER	Few targets not met <u>or</u> Laboratory/Clinical feedback identifies additional learner support	Review in 4 weeks Address any identified needs Inform Internal Quality Assurer (IQA)
RED	Several targets not met <u>or</u> Laboratory/Clinical feedback identifies additional learner support <u>or</u> Learner requires pastoral care or Attendance concerns	Review in 1 week / ongoing Address any identified needs Inform IQA Any pastoral need – use appropriate LTHT signposting or policy/process

### Programme Manager

Programme manager will be informed of any issues of progress or pastoral care which require internal escalation by the Personal Tutor.

### Clinical Departments / Laboratories

There are trained clinical mentors/tutors on each of the clinical departments/laboratories. These mentors will assist the learner with qualification requirements of the department including shadowing experience, use and completion of clinical logbooks/Work Based Learning logbooks, completion of witnessed activities and completion of reflective account and direct observation. A clinical/progress report is completed by either the clinical mentor or the tutor on each department/laboratory to review the learners' strengths and additional learning support needs.

Any learners under 18 will be highlighted to the department/laboratory to ensure appropriate support and supervision is instigated.

## **Pastoral Support**

In the event that an Apprentice requires Pastoral Care/support/guidance then our programme tutors will provide additional support where required.

They can also be referred to their employer's Occupational Health referral pathway.

The process will be as follows:

Apprentice has a care/support need identified

Tripartite discussion between Programme Lead, and employer

Agreement on which organisation should lead and make referral

Agreement obtained from Apprentice to refer to Occupational Health for support

Lead investigator to follow appropriate OH referral pathway

Notify all parties of progress and outcome

### **4.5iv Monitoring IT Usage**

As mentioned in the Information Governance: Use of Computing Facilities Policy, LTHT monitors the general levels of usage of ICT, including email, specific web sites visited and the uploading of sensitive documents.

Monitoring is undertaken to ensure both the technical integrity of the LTHT ICT systems, and to facilitate investigation of security and disciplinary incidents.

Staff and apprentices should be aware that as part of access to social media platforms, the IT team has the ability to monitor how long and when they use social media websites through an LTHT device.

LTHT reserves the right to monitor internet usage at any time, but will endeavour to inform an affected employee, apprentice when this is to happen and the reasons for it where appropriate. LTHT considers that valid reasons for checking internet usage include suspicions of:

- Spending an excessive amount of time viewing websites that are not work-related; or.
- Acted in a way that damages the reputation of LTHT.

Any information held or passing through the email system is the property of LTHT.

At the request of the Chief Executive the LTHT ICT Service Security Department may carry out investigations into email usage.

All external emails are routinely virus scanned and where viruses are detected the email is quarantined until clean. If this is impossible, then the email administrator will contact the recipient. In this case the email would be opened by the recipient within the quarantine area.

Formal complaints about misuse of email will be investigated.

Inappropriate emails will be automatically blocked for the protection of LTHT and individuals (e.g. spam and adult content).

Any monitoring or interception of communications will be carried out in accordance with legislation such as the Regulation of Investigatory Powers Act 2000, The Telecommunications (Lawful Business Practice) (Interceptions of Communications) Regulations 2000, The Data Protection Act 2018, Investigatory Powers Act 2016 and the Human Rights Act 1998. These outline circumstances in which the Trust can lawfully intercept emails made on NHSmail such as:

- Gaining routine access to business communications.
- Monitoring standards of service and training.
- Preventing or detecting crime; and the unauthorised use of systems.

## 4.6 Prevent

### 4.6i Key Definitions

Terrorism	the use of violence for political ends, including any use of violence for the purpose of creating fear and division within society.
Radicalisation	is a process by which an individual or group adopts or is coerced into increasingly extreme political, social, or religious ideals that reject or undermine the status quo or undermine contemporary ideas and expressions of freedom of choice and respect for diversity and human rights.
Extremism	<p>The demonstration of unacceptable behaviour by using any means or medium to express views which:</p> <ul style="list-style-type: none"><li>• Encourage, justify or glorify terrorist violence in furtherance of particular beliefs</li><li>• Seek to provoke others to terrorist acts</li><li>• Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or</li><li>• Foster hatred which might lead to inter-community violence in the UK.</li></ul>
Contest	<p>UK Government's counter terrorism strategy that aims to reduce the risk to the United Kingdom and its interests overseas from terrorism.</p> <p>CONTEST is primarily organised around four key principles. Work streams contribute to four programmes, each with a specific objective:-</p> <ul style="list-style-type: none"><li>• PURSUE: to stop terrorist attacks.</li><li>• PREVENT: to stop people becoming terrorists or supporting terrorism.</li><li>• PROTECT: to strengthen our protection against a terrorist attack.</li><li>• PREPARE: to mitigate the impact of a terrorist attack.</li></ul>

## 4.6ii Purpose

### **Ensuring Apprentices and Employees are resilient to Extreme Narratives**

LTHT will work with employers to ensure apprentice learners are not exposed to risks associated with extreme narratives and have an awareness of PREVENT and British Values. These are embedded in our apprenticeship programmes from induction, included as curriculum topics, progress reviews and annual training requirements.

Staff must have an open culture which allows freedom of speech and exploration of issues that affect learners locally, nationally & internationally. The team are expected to understand & embed British Values into the apprenticeship delivery to ensure apprentice learners are aware of them, can evidence, exemplify and understand.

Learners through training provided will be required to understand how to keep themselves protected from risks associated with radicalisation, extremism, forms of abuse, grooming, bullying & staying safe online.

### **Identifying Changes in Behaviour of Apprentices and Employees**

All employees/apprentices receive training radicalisation or extremism which includes:

- Showing sympathy for extremist causes.
- Glorifying violence, especially to other faiths or cultures.
- Making remarks or comments about being at extremist events or rallies.
- Evidence of possessing illegal or extremist literature.
- Advocating messages similar to illegal organisations or other extremist groups.
- Out of character changes in dress, behaviour, and peer relationships.
- Secretive behaviour.

### 4.6iii PREVENT Risk Assessment & Action plan

A detailed Prevent Risk Assessment & Action Plan can be found at the following link.

The PREVENT Duty Guidance requires all specified organisations to conduct a regularly reviewed PREVENT Risk Assessment and associated Action Plan.

A summary of the Risk Assessment and Action Plan will be reported annually to the Senior Management Team and in line with LTHT Risk Management Policy.

Activities and events which may pose a risk of radicalisation, including the presence of visiting speakers will be risk assessed.

Safeguarding and PREVENT concerns relating to the LTHT Apprenticeship programme delivery would be escalated to the School Performance and Quality Improvement Group.

The PREVENT concern would also be shared with the apprentice's employer if appropriate to do so and agree further actions.

#### **PREVENT Referrals**

A PREVENT referral is a supportive activity which initially involves identification of any student or member of staff at risk of radicalisation.

A referral should be made via a member of the Safeguarding Team, typically the Designated Safeguarding Officer.

If there is an immediate terrorist threat, an immediate risk to persons or property or a crime has been committed then the Police should be contacted on 999 without delay and notify the nominated DSO of the issue and action taken.

In the event that an apprentice or a member of staff have concerns that an apprentice may be at risk of being drawn into terrorism or may be vulnerable to grooming or exploitation by others, then the nominated DSO should be notified who will collate all relevant information and share their findings with appropriate leads depending on situation and formulate an action plan.

If anyone suspects that an apprentice is being radicalised, they can also call the confidential PREVENT Helpline 0800 011 3764 for advice or Anti-

Terrorist Hotline on 0800 789 321.

“Making a referral to Prevent” guidance published in October 2022: [Making a referral to Prevent - GOV.UK](#)

## **5 Equality and Diversity Impact**

This Procedure has been assessed for its impact upon equality. The Leeds Teaching Hospitals NHS Trust is committed to ensuring that the way that we provide services and the way we recruit and treat staff reflects individual needs, promotes equality and does not discriminate unfairly against any particular individual or group.

## **6 Consultation and review process**

This Policy has been reviewed by the Head of Learning & Apprenticeships, the Head of SODCP and Policies & Procedures team.

Consultation on the policy has been undertaken with the Strategic Apprenticeship Review Group.

## **7 Standards/ Key Performance Indicators**

The Key Performance Indicators are set out in section 9 within the Monitoring Compliance and Effectiveness Table

## 8 Monitoring Compliance and Effectiveness

The monitoring arrangements are outlined in the following table.

Procedure element to be monitored	Standards and Performance indicators	Process for monitoring	Individual or group responsible for monitoring	Frequency or monitoring	Responsible individual or group for development of action plan	Responsible group for review of assurance reports and oversight of action plan
Specificity of policy, procedures and processes applicable to Apprentices, trainers and staff involved in the delivery of apprentices	Regulation of the Education and Skills Funding Agency (ESFA)	Review of the policy	Head of School of Dental Care Professionals	Annually	Head of School of Dental Care Professionals (SODCP)	Strategic Apprenticeship Review Group (SARG)
Effectiveness of Complaints Procedure	Number of Complaints received and evidence of trends	Review of complaints on record	Quality Assurance Lead	Quarterly	Quality Assurance Lead	School Performance and Quality Improvement Group SARG
Impact of Equality and Diversity policy	Feedback received from apprentices	8-12 week progress reviews  Surveys	School Performance and Quality Improvement Group	8-12 weeks  Periodical	School Performance and Quality Improvement Group	School Performance and Quality Improvement Group
Health & Safety Management successfully implemented and included within their governance and performance forums	Compliance with legal, policy and procedural requirements.  Health & Safety Controls Assurance process outcomes	Health & Safety is a standing agenda item on the SODCP governance and performance meetings	Head of School of Dental Care Professionals	Annually	Head of School of Dental Care Professionals	SARG

<p>Apprentices, delivery staff are aware of their responsibilities and know the reporting procedures for all safeguarding issues.</p>	<p>Compliance in accordance with relevant legislation and statutory guidance</p>	<p>Policy is shared during on-boarding and induction, signed induction documents confirming acknowledgement of policy, standing agenda item on progress review meetings.</p>	<p>Apprenticeship Programme Lead</p>	<p>Annually</p>	<p>Head of School of Dental Care Professionals (SODCP)</p>	<p>School Performance and Quality Improvement Group</p>
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## **9 Plan for Communication and Dissemination of Procedure**

This procedure once approved will be shared on the LTHT Apprenticeship page.

## **10 References / Associated Documentation**

