



## Prevent Policy

Area: Safeguarding

Effective from: 01/01/2018 Review date: 01/01/2022

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## Prevent Policy

### 1. Policy Statement

1.1 Apprenticeship Connect is committed to the safeguarding people from the threat of terrorism and the risk of being radicalised and radicalising others. Apprenticeship Connect fully recognises our responsibilities for protecting all people and particularly vulnerable groups. Our policy applies to all staff, learners, contractors, visitors and volunteers working on behalf, of or in conjunction with Apprenticeship Connect.

1.2 This policy has been developed in accordance with:

- Counter-Terrorism and Security Act 2015
- Revised Prevent duty guidance: for England and Wales

1.3 This policy is in line with the statutory Prevent duty guidance: for further education institutions in England and Wales.

Further, this policy recognises the following important and relevant pieces of safeguarding related legislation:

- Safeguarding Children and Safer Recruitment in Education (2011)
- Safeguarding Vulnerable Groups Act (SVGA) (2006)
- Protection of Freedoms Act (2012)
- Revised Code of Practice for Disclosure and Barring Services Registered Persons (2015)
- Equality Act (2010)

1.4 There are six main principles of the organisation's Prevent strategy:

1. **Leadership and management** - ensuring effective leadership and management of Prevent provision.
2. **Safer recruitment** - ensuring that we operate safer recruitment practices.
3. **Training** - raising awareness of Prevent throughout the organisation and ensuring staff are equipped with the appropriate skills and knowledge to support learners effectively and help keep them safe.

4. **Equipping, educating and empowering** - raising awareness of Prevent among all our learners and ensuring that learners who are the most vulnerable are equipped with the skills and knowledge to keep them safe from radicalisation.
5. **Reporting** - developing and implementing procedures for identifying and reporting cases or suspected cases relating to the Prevent duty.
6. **Culture** - establishing safe environments in which vulnerable groups can learn and develop and establishing a culture where Prevent is taken seriously. Including the promotion of fundamental British values.

1.5 We recognise that because of the day-to-day contact with learners, our staff are well placed to observe the outward signs of radicalisation. Apprenticeship Connect will, therefore:

- 1.5.1 establish and maintain an environment where learning is made safe and secure;
- 1.5.2 ensure learners know that there are designated staff within Apprenticeship Connect whom they can approach if they are concerned or worried;
- 1.5.3 include opportunities within our ongoing teaching, learning and assessment for learners to develop the skills to recognise signs of radicalisation;
- 1.5.4 promote fundamental British values.

1.6 To support our commitment to the Prevent duty we will:

1. Ensure that we have a designated person for Prevent (Prevent lead) who has received appropriate training and support for this role.
2. Ensure that all staff are aware and understand their responsibilities concerning the Prevent duty, being alert to the signs and indicators of radicalisation and extremism, and referring any concerns directly to the Prevent lead.
3. Ensure that effective safeguarding procedures are developed and implemented and monitored to ensure their effectiveness. These procedures are based on the 5R's approach of recognition, response, record, report, and refer.
4. Ensure that we develop effective links with relevant external agencies and local Prevent coordinators and co-operate with any requirements of referral matters.
5. Ensure that we keep written records of any Prevent concerns, even when there is no need to refer the matter to the relevant agencies.
6. Ensure all records are stored securely and in accordance with the Data Protection Act 2018.

## 2. Definitions

### 2.1 Radicalisation

‘Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups’. (Prevent Duty Guidance, p.12. 3 and Section 26 of the Counter-Terrorism and Security Act 2015).

Radicalisation is a process which somebody goes through to become involved in extremist activities or terrorism, from a starting point of having no particular strong opinions or being a moderate person through to holding some extremist views and it can be a process that happens online or in meeting people, and their conversations and their opinions are gradually changed over time (Saefgaurdung and Prevent Research Report 2017).

### 2.2 Extremism

‘Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty, and respect and tolerance for different faiths and beliefs. We also regard calls for the death of members of our armed forces as extremist’. (The Counter Extremism Strategy 2015).

## 3. Understanding Prevent

3.1 Prevent is one of the four elements of CONTEST, the UK Government’s counter-terrorism strategy. According to the CONTEST strategy, Prevent aims to stop people from becoming terrorists or supporting terrorism. Prevent is therefore a proactive process of protecting and preventing individuals who may be vulnerable to radicalisation and therefore preventing terrorism and the support of terrorism.

3.2 Terrorist groups often draw on extremist ideology, developed by extremist organisations or individuals. People who radicalise others were once radicalised themselves.

3.3 The benefits of effective implementation of the Prevent duty include:

- Protecting people from the effects of terrorism
- Leaders and managers understand how to contribute to our Prevent duty and the wider CONTEST strategy
- Staff are clear about individual responsibilities, roles and boundaries
- When learners feel safe and secure, they can concentrate on learning
- Vulnerable people are prevented from radicalisation

3.4 According to the Safeguarding and Radicalisation Research Report 2017, radicalisation can be seen as a two-stage process. The first stage encompasses an attitudinal

journey, where a vulnerable individual begins to hold extremist views - vulnerabilities being influenced by background factors (e.g. criminality, troubled family background), experiences and influences (e.g. friends and family), and unmet psychological needs (e.g. for belonging and status). The second stage focuses on behaviours, where extremist views turn into violent actions influenced by social, emotional or experiential factors. Within both stages, there are opportunities to proactively and reactively support individuals and families to protect them from the risks of radicalisation.

## Risk Areas

The following section defines and describes various types of Prevent risk areas. The organisation has sought to define the majority of types of risks however this may not represent an exhaustive list of all types of risks.

### 4. Risk Areas

#### 4.1 Online forums

Various extremist online forums exist that are a haven for radicalises, sympathisers, vulnerable people and terrorists. Extremist platforms are often unregulated and allow the sharing of extremist ideologies, materials and literature freely.

#### 4.2 Social media

Social media platforms represent risks as extremist ideologies, materials and literature are shared routinely. Despite efforts to censor, restrict or prohibit certain types of material, individuals with mal-intent can bypass system filters through the use of disguised words, codes and imagery. Further, the pace of social media is such that even well-regulated platforms struggle to deal with extremist material as once shared online it is often copied to other locations on the web quickly.

#### 4.3 Religious fundamentalism

It is important to express a distinction between fundamentalism, 'the unwavering attachment to a set of irreducible religious beliefs' and radicalisation, 'the process by which a person comes to support terrorism and extremists' (Social Science in Government, Safeguarding and Radicalisation 2017). A person could develop fundamentalist beliefs without radicalisation and a radicalised individual may not necessarily have fundamentalist beliefs, however, a radicalised person is motivated by extremist perspectives of religion. Notwithstanding this, individuals developing fundamentalist religious beliefs may become vulnerable to radicalisation.

#### 4.4 Far-right extremism

Far-right extremism is the support for individuals, organisations and the belief in far-right views.

#### 4.5 Incels

Incel stands for 'involuntary celibate or involuntary celibacy'. Incel in the context of radicalisation is an (often) online community of men unable to form romantic relationships who develop perspectives of male supremacy, hatred for women and radical beliefs.

#### 4.6 Children Missing in Education

A child is missing when their whereabouts are unknown, whatever the circumstances of their disappearance. These children have taken unauthorised absence and would not usually come within the definition of missing.

Children who are in the social care system may be more likely to run away than other children.

The person may be missing from care or home because they are suffering physical, sexual or emotional abuse and/or neglect. Children who go missing may be victims of sexual exploitation and trafficking. However, staff must be aware that a child missing in education may be due to radicalisation. Children/young people missing from education are also at risk of harm.

This policy covers those instances of absence where:

1. There is a repeated pattern of absence.
2. The reason for absence is unclear or unexplained.
3. A member of staff has concerns about the nature of the child's absence.

In these instances, Apprenticeship Connect's designated safeguarding lead should be consulted who may refer the case to the Prevent lead.

## Prevent Leadership and Management

### 5. Prevent Leadership and Management and Responsibilities

5.1 Apprenticeship Connect has in place a Prevent team, key roles with designated responsibility include:

- Gemma Stansfield, Designated Safeguarding Lead
- Rafiq Adebambo, Prevent lead

5.2 The designated safeguarding lead is a member of Apprenticeship Connect's management team and the Prevent lead is a director. They have a key duty to take the lead responsibility for raising awareness within the organisation and dealing with issues relating to the Prevent duty.

This includes:

1. Overseeing the referral of cases of radicalisation or allegations to Prevent coordinators and agencies such as the Police or Channel as appropriate.
  2. Providing advice and support to other staff on issues relating to Prevent.
  3. Maintaining a proper record of any Prevent referral, complaint or concern (even when the concern does not lead to a referral).
  4. Ensuring that all staff receive training in children and vulnerable adult issues and are aware of Prevent procedures.
- 5.3 Apprenticeship Connect takes the view that all staff and learners are required to take shared responsibility for the protection and safety of children and vulnerable adults at Apprenticeship Connect's sites, employer sites and whilst online.
- 5.4 Processes are in place to check the suitability of staff and learners working directly with children and vulnerable adults. Some staff and learners across the company will be in regular or significant contact with children or vulnerable adults in the course of their teaching or other work. There is a commitment that such staff and learners have a satisfactory Disclosure and Barring Service (DBS) enhanced with a barred list check in place. Refer to the organisation's Safer Recruitment Policy and Disclosure and Barring Service (DBS) Policy.
- 5.5 Apprenticeship Connect has processes in place to ensure that external speakers/trainers on-site are checked. Please refer to the External Speaker Policy for the related procedures.

## **6. Implementation and Monitoring**

- 6.1 The organisation manages, monitors and plans its safeguarding activity through the following meetings:

### **Safeguarding Leadership Meeting**

- A monthly meeting is held between the designated safeguarding lead and the Board representative
- Plan safeguarding leadership strategies including Prevent
- Case review
- Continuous improvement and the Prevent Action Plan

### **Safeguarding Management Meeting**

- A monthly meeting is held between the designated safeguarding lead, deputy safeguarding lead and male safeguarding officer.
- Implementing safeguarding plans including Prevent
- Planning training for staff, learners and employers
- Discussing the themes from current cases

## **7. Control Measures**

- 7.1 Apprenticeship Connect believes that everyone has rights as individuals and should be treated with dignity and respect. Apprenticeship Connect strives to provide a safe environment for any child or vulnerable adult in its care whilst they are studying, visiting premises or participating in Apprenticeship Connect activity.
- 7.2 Activities at Apprenticeship Connect that involve children or vulnerable adults are risk-managed and will be supported by risk assessments and reasonable, proportionate adaptations to their activities as appropriate will be made.
- 7.3 As a condition of admission to certain programmes of study where they will come into close contact with children and vulnerable adults may be required to undergo a DBS check before the commencement of placement/training activity. Apprenticeship Connect is obliged to refuse admission if the DBS disclosures disqualify the applicant from practising in their chosen field.
- 7.4 Apprenticeship Connect has published procedures for reporting cases of suspected radicalisation or extremism. A full copy is set out in Appendix 1 of this document.
- 7.5 These procedures are issued to all members of staff and all new learners to the organisation during their induction. Further staff training (mandatory) is provided to all Apprenticeship Connect staff and renewed annually.

## **8. Safer Recruitment**

- 8.1 Apprenticeship Connect has written recruitment and selection procedures contained within the Safer Recruitment Policy. The policy and procedures are designed to safely recruit staff and provide a safe environment for children and vulnerable adults to learn in. Key aspects of the procedures and processes are as follows:
  - 1. Job descriptions are available for all roles. All jobs contain explicit responsibility to adhere to the Prevent duty and promoting the welfare of learners having due regard to Apprenticeship Connect's Prevent Policy and Safeguarding Policy.
  - 2. A person specification setting out the key selection criteria is available for all roles. The person specification includes demonstrating a commitment to safeguarding policies and the suitability to work with children and vulnerable adults.
  - 3. Advertising of posts externally as appropriate.
  - 4. A requirement for those appointed to produce documentary evidence of academic/vocational qualifications.
  - 5. Standard interview questions for candidates who work with children and vulnerable adults to explore their suitability. Interviewers are advised to follow up on any gaps or discrepancies in the employment history of applicants.
  - 6. Two satisfactory references are obtained for each successful applicant as a condition of their employment. The first reference should be the applicants existing or most recent employer. The second reference should also be from an employer. Character references are only used where an applicant has little or no work experience.
  - 7. A policy on the recruitment of ex-offenders.



8. A policy on obtaining a satisfactory Disclosure and Barring Service (DBS) and 'barred list' check for appropriate positions as a condition of employment at Apprenticeship Connect.
- 8.2 Apprenticeship Connect reserves the right to deny employment to individuals where permitted criminal record checks suggest they may pose a danger to the learning community.
- 8.3 Apprenticeship Connect also reserves the right to suspend and/or dismiss staff members from employment or undertaking a specific role if the information was withheld, when requested, about their criminal record at the point of employment, or a criminal record acquired during employment.
- 8.4 DBS disclosures will be obtained for all staff and volunteers working in 'regulated positions' (as defined by the Criminal Justice and Court Service Act 2000) with children, young people or vulnerable adults as per IAS guidelines; Apprenticeship Connect where appropriate evaluates information to determine individuals' appropriateness to work in such activity.

## **9. Promoting Prevent**

- 9.1 The organisation is determined to foster a culture whereby respect for fundamental British values is commonplace. The Prevent Policy is publicised on the website, intranet and in all courses, accessible to learners.
- 9.2 All learners will receive communications at various stages about Prevent at Apprenticeship Connect including:
  - Information, advice and guidance during the induction including educating about what Prevent is, and how to report an issue.
  - Access to the Prevent Policy in the 'policies' section' in the learner's Canvas course.
  - Dedicated resources in the Information Advice and Guidance module in the learner's Canvas course.
  - Frequent reference to Prevent throughout on-programme learning.
  - Communications are sent out notifying learners of any changes, updates and information relating to Prevent.
- 9.3 The teaching, learning and assessment team embed Prevent throughout all learners' taught curriculum.
- 9.4 Progress reviews for learners (every 12 weeks) including wellbeing and welfare, and safeguarding sections.
- 9.5 Learners complete quizzes and knowledge checks during the programme to verify whether they know how to seek help from the safeguarding team.

- 9.6 The e-learning system Canvas features a 'help' button allowing direct access to the safeguarding team.
- 9.7 Tutor team meetings include a safeguarding meeting item at least quarterly to support the promotion of safeguarding across the provision. Prevent-specific items occur at least bi-annually.
- 9.8 Quarterly email communications will be issued to employers of current apprentices to advise about Prevent.
- 9.9 All employers are required to sign a Services Agreement recognising and committing to the Prevent Policy.
- 9.10 All staff members are required to confirm that they have read, understood and accepted the Prevent Policy.

## **10. Training and Development**

- 10.1 All Apprenticeship Connect staff receive a Prevent induction in their first week of employment delivered by the designated safeguarding lead.
- 10.2 Members of the safeguarding team will each undertake Prevent training at least annually.
- 10.3 The Prevent lead will undertake training on Prevent at an advanced level at least annually.
- 10.4 Staff in the teaching, learning and assessment team will undertake general training on Prevent at least annually.
- 10.5 Staff in the teaching, learning and assessment team will undertake topic specific-training in the risk areas identified under 'Prevent Risk Areas' above, annually.
- 10.6 All staff in the organisation will undertake Prevent training at least annually.
- 10.7 The designated safeguarding lead or Prevent lead will regularly update staff on implementing Prevent reporting procedures in monthly team meetings as required.

## **11. IT & Online Safety**

- 11.1 The organisation will at its discretion monitor the usage of its IT systems to prevent access to inappropriate materials by setting appropriate levels of filters on its network.

- 11.2 The organisation will set filter levels to protect users within its network.
- 11.3 Accessing illegal, illicit sites on the company hardware, during lessons or through company software is strictly prohibited and individuals identified to have done so will be disciplined under the Disciplinary Policy and codes of conduct.
- 11.4 The organisation enforces the following policies to protect users and learners:
- Cyber-security Policy
  - Cyberbullying Policy
  - Data Breach and Incident Reporting Procedure
  - Data Protection Policy
  - Electronic Communications Policy
  - Email & Internet Policy
  - Internet Access Policy
  - Social Media Policy

## **12. Localised Approaches**

- 12.1 The organisation will take a localised approach when planning strategies for Prevent. The prevalence and types of risks vary between different regions. Hence, Apprenticeship Connect understands that the plan implemented in one area may not adequately identify, deal with and mitigate the most important risks.
- 12.2 The organisation will identify high prevalence/priority areas for radicalisation at the outset if it delivers in the area. The Prevent lead or another member of the safeguarding team will establish relationships and links with local Prevent coordinators to understand localised Prevent concerns.

## **13. Prevent Self-assessment and Action Plan**

- 13.1 The organisation will undertake a Prevent Self-assessment at least annual.
- 13.2 The organisation will maintain a Prevent Action Plan that will be implemented and revisited frequently.

## **14. External Speakers and Events**

- 14.1 The organisation through its External Speaker Policy ensures that all guest speakers are appropriately vetted, selected and monitored. The organisation understands that learners require diverse views to develop tolerance (a fundamental British value), achieve learning aims and understand different approaches however, learners must not

be exposed to extremist views, the encouragement of terrorism and the risk of being radicalised.

- 14.2 When planning an event the organisation will take into account whether the views being expressed, or likely to be expressed, constitute extremist views that risk drawing people into terrorism or are shared by terrorist groups. The organisation will risk assess each planned event and make decisions in line with expressed and implied intent of the Counter Terrorism and Security Act 2015, and the Revised Prevent duty guidance: for England and Wales. Events considered high risk will only take place if the organisation can satisfy itself that any risks are mitigated for example ensuring that, where any event is being allowed to proceed, speakers with extremist views that could draw people into terrorism are challenged with opposing views as part of that same event, rather than in a separate forum.

## **15. Welfare and pastoral care/chaplaincy support**

- 15.1 Apprenticeship Connect committed to equality, diversity and inclusion. To this effect, it aims to facilitate all learners to practice their religious faiths. At relevant sites where prayer room facilities are available the organisation's 'Faith-related Activities Policy' will apply a summary of which is as follows:
- Any learner or member of staff found to be disseminating or distributing offensive material within the prayer room will be disciplined using the relevant Disciplinary Policy.
  - Any posters, leaflets or other material displayed without permission of the organisation will be removed.
  - Concerns about radicalisation concerning prayer rooms should be raised according to the Prevent lead or another member of the safeguarding team
  - The procedures the safeguarding team will follow in the event of an issue using prayer rooms.
  - The organisation will consider adaptations to planned activities around religious points of the year for example during Ramadan when individuals may be fasting.
  - The organisation will plan extra-curricular activities carefully to ensure inclusivity.

# Appendix 1

Procedures for reporting cases of suspicion of abuse.

## 1. The Duty to Report

- 1.1 Apprenticeship Connect and all its members of staff have a legal duty to report cases of suspected radicalisation or extremism. If you, as a member of staff, have concerns that a person has been abused, you **MUST** report this.

## 2. What to do if you notice something you're concerned about?

- 2.1 You may become aware of radicalisation:

1. You may observe signs in a learner (or any person) that lead you to suspect that they have been radicalised or are radicalising someone else.
2. The learners (or any person) themselves may disclose to you that they may have been radicalised.
3. Someone tells you about a concern that they have about someone who is vulnerable to or has been radicalised.

- 2.2 The tables below give examples that may indicate that an individual is being radicalised.

### a. Possible signs of radicalisation include:

- Non-compliant behaviour, for example, rejecting class rules
- Sudden changes to demeanour
- Improbable explanations for injuries
- Running away
- Significant changes in behaviour without explanation
- Admission of punishment which appears excessive
- Unexplained patterns of absence
- Deterioration of work
- Fear of returning home or of parents being contacted
- 'Neurotic' behaviour
- An air of detachment
- Inappropriate emotional responses to sensitive situations
- Social isolation
- Depression/withdrawal
- Drug/solvent abuse
- Promiscuity, prostitution, provocative sexual behaviour
- Attempts to teach others about extremism
- Participation in banned online forums
- A high amount of knowledge and awareness of the dark web

- Tiredness, lethargy, listlessness
- Withdrawal from friends
- Aggressiveness, anger, and anxiety
- Unexplained gifts of money
- Sudden changes to clothing style
- Tattoos suggesting an affiliation with extremist groups
- The individual's views become increasingly extreme regarding another section of society or government policy
- Sympathy for extremist views
- Lack of tolerance for the views and opinions of others
- Excessive passion and vigour when expressing religious or political beliefs
- The individual is observed downloading, viewing or sharing extremist propaganda from the web
- The individual becomes increasingly intolerant of more moderate views
- The individual becomes withdrawn and focused on one ideology
- The individual expresses a desire/intent to take part in or support extremist activity

2.3 If a learner discloses to you that they (or indeed another person) have been, or are being radicalised -

#### **DO**

- Listen very carefully to what they tell you
- Take what is said seriously and accept what you are told
- Stay calm and reassure the learner that they have done the right thing by talking to you
- Write down as soon as you can exactly what you have been told
- Tell them that you must pass this information on but only to those that need to be told. Tell them to whom you will report the matter

#### **DO NOT**

- Panic
- Promise to keep things secret. You must refer a child or vulnerable adult who is at risk
- Lie or say that everything will be fine now that they have told you
- Criticise the abuser, especially if it is a parent or carer
- Ask lots of detailed questions. Instead, ask open questions such as 'anything else to tell me?'
- Press for answers that the learner is unwilling to give
- The person to whom the disclosure is made mustn't investigate or question the person concerned except to clarify what they have heard. This is particularly important in cases of sexual abuse.

- 2.4 It is very important to record, as accurately as possible, what was said to you when you received the disclosure of abuse. All written records should be handled confidentially.
- 2.5 If a child or vulnerable adult discloses to you that they or another have been radicalised, or if you suspect from what you observe that they are being abused, YOU MUST REPORT THIS to the Prevent lead.
- 2.6 If a disclosure/concern involves a member of Apprenticeship Connect staff, you must contact and report it to the Prevent lead.
- 2.7 If for any reason you are unable to contact a member of the designated team and the matter is urgent, then contact the local authority or the Police directly and report the matter to the Prevent lead at the next available opportunity.
- 2.8 In all cases, if you are concerned, the rule is to pass this on quickly and to seek help and further support rather than to worry alone or do nothing.

### **3. Referral and Case Management**

#### **3.1 Procedure**

##### **1. Referral**

A referral can be made by any individual including:

- The person that is at risk of, or has been radicalised
- The person that radicalised another person
- A member of the Apprenticeship Connect staff
- A visitor
- A parent
- A contact at an employer
- An external agency
- A partner

A referral will normally be made via telephone to the Prevent lead. However, all Prevent referrals must be followed up by using the Safeguarding Reporting Form, a confidential ticket system in the intranet MyAC. If a referral is made by a person that doesn't have access to the intranet, the Prevent lead will record the report.

##### **2. Investigation**

The Prevent lead will investigate the report thoroughly.

##### **3. Referral**

The Prevent lead will take the appropriate action based on the investigation which may include referral to an external agency such as the Prevent coordinator, Channel or the Police.

When a member of staff refers to suspected radicalisation or extremism, the Prevent lead will normally refer this externally due to the severity of the risks involved, and

the Prevent duty. However, the Prevent lead will seek to substantiate claims made using their professional judgement. In deciding what action to take the Prevent lead may take advice from the local Prevent coordinator.

In the instance of a referral, the external agency may take over responsibility for the issue.

#### **4. Actions**

The Prevent lead will carry out and advise of the actions to take by all relevant persons and/or follow the instructions of the local authority Policy or Channel.

#### **5. Case management**

The Prevent lead will keep comprehensive records of all communication, action and records relating to the case and determine the duration of ongoing monitoring and action plans based on the individual circumstance.

A confidential record will be kept of all cases referred to the designated safeguarding team, including details of cases referred to the local authority, the Police, Channel or other services. These written records will be kept securely, with any paper information held securely by the Prevent lead.

### **Policy Review**

The organisation will review this policy at least annually or sooner if required.

### **Related Policies**

- Safeguarding Policy
- Safer Recruitment Policy
- Disclosure and Barring Service (DBS) Policy
- Whistleblowing Policy
- Cyber-security Policy
- Cyberbullying Policy
- Data Breach and Incident Reporting Procedure
- Data Protection Policy
- Electronic Communications Policy
- Email & Internet Policy
- Internet Access Policy
- Social Media Policy
- External Speaker Policy
- Faith-related Activities Policy

### **Contact Us**

- Email: [help@apprenticeshipconnect.co.uk](mailto:help@apprenticeshipconnect.co.uk)
- Prevent lead: 0203 829 6939