

UNITED APPRENTICESHIPS

Safeguarding (Children and Adults at Risk) Policy

2026 | 27

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Key Contacts

If a person is in immediate danger, call 999. For any safeguarding concern, contact the Designated Safeguarding Lead or use the safeguarding mailbox without delay.

Contact	Details
Safeguarding mailbox	UAsafeguarding@unitedlearning.org.uk (monitored, reaches the DSL team)
Designated Safeguarding Lead (DSL)	Sara Bryson, United Learning Safeguarding Officer - sara.bryson@unitedlearning.org.uk - 01832 864425 (ext. 4425)
Deputy DSL / Senior Leader	Claire Jeens, Head of Apprenticeships - 07880 005146 - claire.jeens@unitedlearning.org.uk
Head of Safeguarding (group oversight)	Frazer Smith, United Learning - frazer.smith@unitedlearning.org.uk
Police	999 (emergency) / 101 (non-emergency)
Children's social care	Default: Peterborough - Children's social care / MASH 01733 864170 (PCCMASHReferrals@peterborough.gov.uk) - out of hours Emergency Duty Team 01733 234724. As a national provider, for learners elsewhere the DSL contacts the relevant local authority for the learner's area.
Adult social care	Default: Peterborough - Adult social care 01733 747474 (adultsocialcare@peterborough.gov.uk) - out of hours Emergency Duty Team 01733 234724. As a national provider, for learners elsewhere the DSL contacts the relevant local authority for the learner's area.
Local Authority Designated Officer (LADO)	Default: Peterborough LADO - LADO@peterborough.gov.uk - 01733 864038 (out of hours Emergency Duty Team 01733 864180). As a national provider, for cases arising elsewhere the DSL contacts the relevant LADO for the local authority where the person works with learners.
Multi-Agency Safeguarding Hub (MASH) / safeguarding partners	Cambridgeshire and Peterborough Safeguarding Partnership Board - safeguardingcambspeterborough.org.uk. Peterborough MASH 01733 864170 - PCCMASHReferrals@peterborough.gov.uk.
Prevent / Channel lead	Sara Bryson (DSL). As a national provider, United Apprenticeships works with the relevant regional CONTEST coordinators; Prevent concerns are referred to the appropriate local Channel panel for the learner's area via the DSL. Immediate risk: call 999. Non-emergency advice: police Prevent advice line 0800 011 3764 or ACT Early (actearly.uk).
NSPCC helpline	0808 800 5000 - help@nspcc.org.uk
NSPCC whistleblowing helpline	0800 028 0285 - help@nspcc.org.uk (for staff raising concerns about safeguarding practice)

Contact	Details
Ofsted (concerns about the provider's safeguarding)	0300 123 4666 - enquiries@ofsted.gov.uk
Disclosure and Barring Service (DBS)	03000 200 190

United Apprenticeships must complete and keep these details up to date, and confirm the local safeguarding partner arrangements that apply to its provision.

Policy Statement

Safeguarding and promoting the welfare of learners is everyone's responsibility. Everyone who comes into contact with our learners has a role to play. United Apprenticeships is committed to providing a safe environment for all learners, whether they are children (under 18) or adults, and to protecting them from harm, abuse, neglect and exploitation, including online.

United Apprenticeships works with learners of different ages, including apprentices and learners who may be under 18, and adults who may be at risk. We take a learner-centred approach: in everything we do, we consider what is in the best interests of the learner. All staff should adopt an attitude of “it could happen here”, and should never assume that abuse or harm is not occurring simply because it has not been reported.

United Apprenticeships fosters an open and positive safeguarding culture in which safeguarding is everyone's responsibility. Staff, learners and partners are encouraged to speak up, and staff feel able to raise any concern - including about a colleague's conduct or about safeguarding practice - without fear of being ignored or penalised. Concerns are listened to, taken seriously and acted on, and leaders model and actively promote this culture.

This policy should be read alongside the key contacts and local information that United Apprenticeships maintains (see the Key Contacts table at the front of this policy), which must be completed and kept up to date.

Scope and Framework

This policy applies to all United Apprenticeships staff (including permanent, temporary, associate and contracted staff), volunteers, and any third party acting on behalf of United Apprenticeships. It also informs the employers and schools we work with.

It covers two groups of learners:

- Children - any learner under the age of 18. Some apprentices and learners are 16 or 17, and have the same statutory protections as any other child.
- Adults at risk - any learner aged 18 or over who has care or support needs and who may be unable to protect themselves from harm or exploitation.

This policy has regard to current legislation and guidance as amended from time to time, including the Education and Training (Welfare of Children) Act, Keeping Children Safe in Education (KCSIE) where relevant to learners under 18, Working Together to Safeguard Children, the Care Act 2014 (in relation to adults at risk), the Prevent duty guidance, the apprenticeship funding requirements relating to safeguarding, the Equality Act 2010 and data protection law. Where UA works with learners under 18, it follows the local multi-agency safeguarding arrangements agreed by the relevant safeguarding partners (the local authority, health and the police) for that area.

Learners aged 16 and 17, and learners who turn 18

Apprentices and learners aged 16 or 17 are children for safeguarding purposes and have the same statutory protections as any other child, including under Keeping Children Safe in Education and Working Together to Safeguard Children. The fact that a learner is employed or in the workplace does not reduce these protections.

When a learner turns 18 during their apprenticeship, the child protection regime no longer applies to them, but they do not automatically lose protection. From their eighteenth birthday they are considered under the adults-at-risk framework (the Care Act 2014) where they have care or support needs and may be unable to protect themselves. Staff should continue to be alert to risk, report any concern to the DSL in the usual way, and recognise that a young adult who has recently turned 18

may remain vulnerable. The DSL decides, on the facts of each case, which framework applies and what action is appropriate.

Key Definitions

Safeguarding and promoting welfare means protecting learners from maltreatment (whether at home, in the workplace, in the community or online), preventing impairment of their health or development, ensuring they are growing up or living in circumstances consistent with safe and effective care, and taking action to enable all learners to have the best outcomes.

- Abuse - a form of maltreatment. Someone may abuse, exploit or neglect a learner by inflicting harm, or by failing to act to prevent harm. It can take place in person or wholly or partly online.
- Adult at risk - an adult who has care or support needs, is experiencing or at risk of abuse or neglect, and is unable to protect themselves as a result of those needs.
- DSL - Designated Safeguarding Lead, the person with lead responsibility for safeguarding at United Apprenticeships. A Deputy DSL (DDSL) acts in the DSL's absence.
- Disclosure - when a learner tells a member of staff that they, or someone else, is being harmed.
- Mental capacity - the ability of an adult to make a particular decision at the time it needs to be made. Under the Mental Capacity Act 2005, adults are presumed to have capacity unless it is established otherwise. Where an adult at risk has capacity, their consent is normally sought before a safeguarding referral is made and their wishes are respected; where they lack capacity for the relevant decision, action is taken in their best interests. Capacity can still be overridden where there is an overriding public interest, a risk to others, or a duty to act regardless of consent.

Full definitions of the different types of abuse (physical, emotional, sexual and neglect) and of specific safeguarding issues are set out in the Appendix to this policy.

Roles and Responsibilities

Senior leadership and those charged with governance

- Make sure United Apprenticeships has effective safeguarding policies, procedures and training in place, and that they are followed.
- Appoint a Designated Safeguarding Lead (DSL) and at least one Deputy, and make sure they have the time, training, status and resources to carry out the role.
- Provide independent oversight of safeguarding and review the arrangements at least annually.

Designated Safeguarding Lead (DSL)

United Apprenticeships' Designated Safeguarding Lead (DSL) is Sara Bryson, United Learning Safeguarding Officer (sara.bryson@unitedlearning.org.uk), who holds lead responsibility for safeguarding and child protection. The Deputy DSL is Claire Jeens, Head of Apprenticeships (claire.jeens@unitedlearning.org.uk), who is also the senior leader with lead accountability for safeguarding at United Apprenticeships. Group-level safeguarding oversight is provided by Frazer Smith, Head of Safeguarding, United Learning (frazer.smith@unitedlearning.org.uk). This responsibility is set out in the relevant job descriptions. The DSL or Deputy DSL is always available during working hours for staff to discuss a safeguarding concern.

- Take lead responsibility for safeguarding and child protection across United Apprenticeships.

- Receive concerns, decide on action, make referrals to children's social care, adult social care, the police or other agencies, and liaise with safeguarding partners and the Local Authority Designated Officer (LADO).
- Keep accurate, secure and confidential safeguarding records.
- Make sure staff are trained and know how to raise concerns.
- Maintain a confidential shared safeguarding mailbox (UAsafeguarding@unitedlearning.org.uk), so that concerns can still be received and actioned when the DSL is unavailable.

All staff

- Be alert to the signs of abuse, neglect, exploitation and radicalisation, in both children and adults at risk.
- Act immediately on any concern, and report it to the DSL (or DDSL) without delay.
- Never promise a learner that they will keep a disclosure secret, and never investigate themselves.
- Maintain an attitude of “it could happen here”.
- Report any concern relating to artificial intelligence - including AI-generated or digitally altered images, AI-enabled harassment, and harmful interactions with AI chatbots – to the DSL in the same way as any other safeguarding concern.

Employers and partners

- Provide a safe environment for learners in the workplace and co-operate with United Apprenticeships on any safeguarding concern.
- Report any safeguarding concern about a learner to United Apprenticeships' DSL without delay.

Concerns About a Learner

What staff should do if they have a concern

If a member of staff has any concern about a learner's welfare, they must act immediately and speak to the DSL (or DDSL). If the DSL or DDSL is not available, this must not delay action - staff should consider speaking to the Head of Safeguarding for the group (Frazer Smith) or taking advice from the relevant local authority (children's or adult social care), and share any action taken with the DSL as soon as possible.

The DSL will consider the appropriate action, which may include:

- supporting the learner internally through United Apprenticeships' own support processes;
- an family help assessment (for a child) or a referral for an adult with care and support needs;
- a referral to children's or adult social care; and/or
- a referral to the police.

Staff must not assume that someone else will take action. Early sharing of information is vital. All concerns, discussions, decisions and the reasons for them must be recorded in writing and stored securely and confidentially.

If a learner is suffering or likely to suffer harm

If a member of staff believes a learner is suffering, is likely to suffer harm, or is in immediate danger, an immediate referral to the relevant social care service (and the police if appropriate) must be made. Anyone can make a referral. If someone other than the DSL makes a referral, they must inform the DSL as soon as possible. If a learner is in immediate danger, call 999.

Listening to learners and family help

United Apprenticeships provides ways for learners to raise concerns about themselves or others, and seeks to provide or signpost help as soon as a problem emerges. Staff, including trainee teaching staff, who consider that a learner may benefit from family help or additional support should discuss this with the DSL.

Information sharing

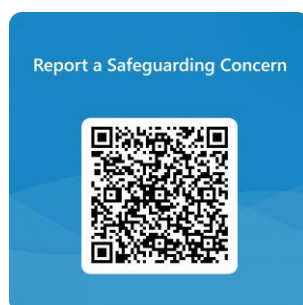
Safeguarding information is often special category personal data. United Apprenticeships complies with data protection law, which allows personal information to be shared without consent where there is a lawful basis, such as to protect a learner whose safety may be at risk. Any decision to share or withhold information, and the reasons for it, will be recorded.

How to Report a Concern

If a person is in immediate danger, call 999. Otherwise, report any safeguarding concern without delay using any of the following:

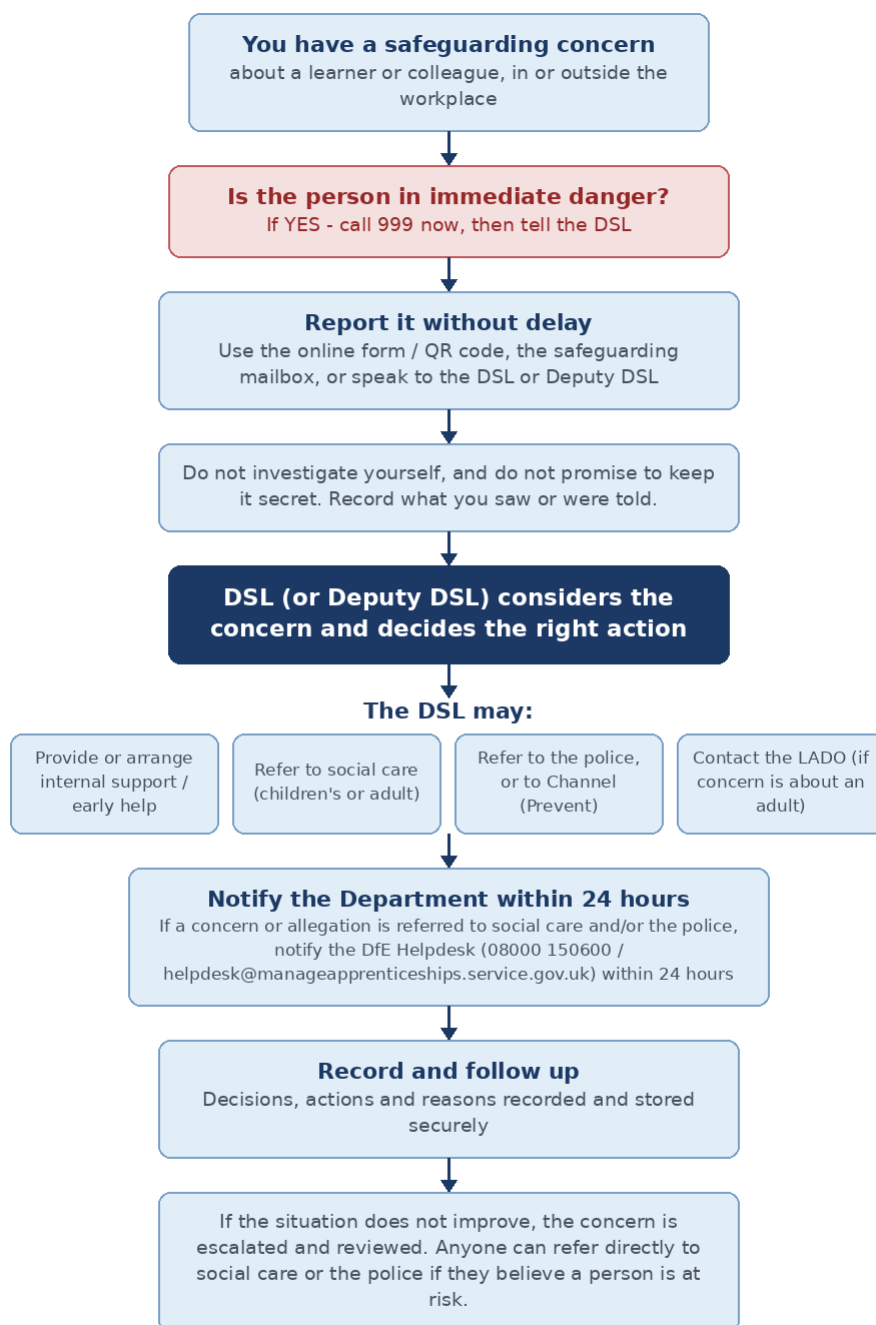
- Online form - Report a Safeguarding Concern: [click here](#) (or scan the QR code below).
- Safeguarding mailbox - UAsafeguarding@unitedlearning.org.uk.
- Speak to the Designated Safeguarding Lead or Deputy DSL (see Key Contacts).

These reporting routes are open to everyone, and a learner's vulnerability or communication needs should never be a barrier to raising a concern. United Apprenticeships makes reasonable adjustments so that learners with special educational needs and disabilities (SEND), or those who need additional support to communicate, can raise a concern and make a disclosure. This may include providing information in an accessible format, allowing a learner to be supported by a trusted person, or arranging communication support where needed. Staff who are unsure how to support a learner to report a concern should contact the DSL.



Scan to report a safeguarding concern

The steps for reporting and handling a concern are shown in the flowchart below.



Concerns about a member of staff follow the allegations process - report to the case manager / senior leader.

Notifying the Department (funding agency)

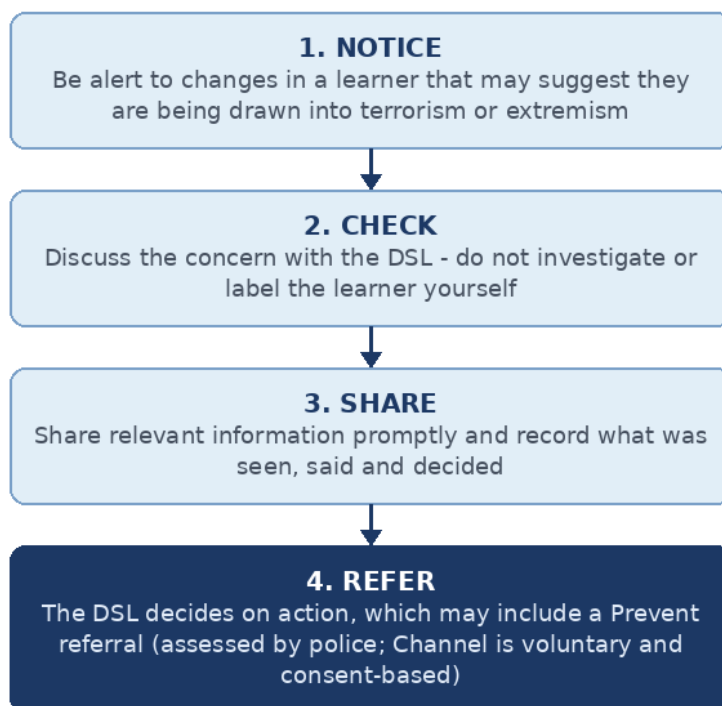
Where a UA DSL refers a safeguarding concern or an allegation of abuse to local authority children's social care / adult social care and/or the police, the DSL must, within 24 hours, inform the Department by contacting the Helpdesk (08000 150600 or helpdesk@manageapprenticeships.service.gov.uk). Such notification must include the name of the Training Provider, a high-level summary of the nature of the incident (without sharing personal information about victims or alleged perpetrators) and confirmation of whether it is, or is scheduled to be, investigated by the Local Authority and/or the police.

Specific Safeguarding Situations

The Prevent duty and risk of radicalisation

United Apprenticeships has a duty under the Prevent duty to have due regard to the need to prevent learners being drawn into terrorism. We take a risk-based, proportionate approach:

- We carry out and review a Prevent risk assessment of the risk of learners being drawn into terrorism, taking account of our dual-site provision and the local picture, in consultation with local partners where appropriate. This includes drawing on Counter Terrorism Local Profiles (CTLPs) produced by counter-terrorism policing to inform our understanding of local risks.
- Our Prevent lead is the Designated Safeguarding Lead, Sara Bryson. As a national provider, United Apprenticeships works with the relevant regional CONTEST coordinators and makes any Channel referral to the appropriate local panel for the learner's area.
- All staff receive Prevent awareness training so they can recognise the signs that a learner may be vulnerable to radicalisation or extremist influence, online or offline.
- Staff who are concerned that a learner may be at risk of radicalisation report this to the DSL, who decides on action, which may include a referral to the Channel programme or to social care.
- Where there is an immediate risk of a learner being drawn into terrorism, staff call 999.
- We promote learners' resilience to radicalisation by supporting their understanding of shared values and the risks of extremism, including online.
- Radicalisation is not linked to any single ideology. Staff should be alert to the risk across the range of ideologies that can draw a person into terrorism, including Islamist extremism and extreme right-wing extremism, as well as other extremist or fixated beliefs. The focus is on the risk to the individual learner, not on any particular faith, background or community.
- Staff follow a simple process if they have a Prevent concern: notice the signs, check by discussing the concern with the DSL, share relevant information, and refer where appropriate. The DSL decides on the action, which may include a Prevent referral. This process is shown in the flowchart below.
- A Prevent referral is first assessed by the police; where a genuine security threat is identified, the matter is always referred on to the police. Channel is the voluntary, consent-based support programme that sits in the pre-criminal space: the learner (or their parent or guardian if they are under 18) must give consent before any Channel support is provided, and a learner can decline or withdraw without being penalised.
- Where a learner is accepted onto Channel, United Apprenticeships co-operates with the multi-agency Channel panel (chaired by the local authority) and contributes information and support as appropriate.
- Where a concern is not an emergency, staff or the DSL can seek advice through the national police Prevent advice line (0800 011 3764) or the ACT Early service (actearly.uk). In an emergency, where someone is in immediate danger, call 999.



Immediate risk - call 999. Non-emergency advice - police Prevent advice line 0800 011 3764 or ACT Early (actearly.uk).

Further information on radicalisation and extremism is in the Appendix.

So-called “honour”-based abuse, FGM and forced marriage

Staff must report any concern about so-called “honour”-based abuse, female genital mutilation (FGM) or forced marriage to the DSL. Specific legal duties apply in relation to FGM where the learner is under 18. Further information is in the Appendix.

Learners absent from learning

A learner who is repeatedly or unexpectedly absent may be at risk. Unexplained or persistent absence can be a warning sign of a range of safeguarding issues. Staff should follow United Apprenticeships' attendance procedures and report safeguarding concerns about absence to the DSL (see also the Attendance Policy).

Concerns about safeguarding practice

Where staff have concerns about poor or unsafe safeguarding practice at United Apprenticeships, they should raise them under the Whistleblowing Policy. No member of staff will face disciplinary action for raising a genuine concern in good faith. If staff feel unable to raise it internally, they may use external channels such as the NSPCC whistleblowing helpline (0800 028 0285 - help@nspcc.org.uk).

Safeguarding in the workplace

All United Apprenticeships learners are employed and spend time in an employer's workplace. United Apprenticeships takes reasonable steps to satisfy itself that learners, particularly those under 18 or adults at risk, are safe in that setting.

- United Apprenticeships carries out safeguarding and health and safety checks before a learner begins, involving the employer. The checks consider the nature of the work, the learner's age and vulnerability.

- Where a learner will work in a role that requires specific pre-employment or suitability checks, United Apprenticeships confirms that the necessary checks have been completed before workplace training begins. The checks themselves are carried out in line with the separate Safer Recruitment Policy.
- Learners are told how to raise a concern with United Apprenticeships' DSL during their induction as well as with their employer. Schools, have their own Designated Safeguarding Lead, whom the learner can also approach.

Any safeguarding concern arising in the workplace is reported to the DSL and dealt with under this policy. Concerns may relate to a learner's experience either at work or in their personal life, and both are covered by this policy.

Learners with additional vulnerabilities

United Apprenticeships recognises that some learners may have additional vulnerabilities arising from their personal circumstances. United Apprenticeships will not always be aware of these unless they are disclosed or shared with us. Where such information is known, staff take account of it in how they support and respond to the learner, and any safeguarding concern is reported to the DSL.

Online safety

Online safety is part of safeguarding. Staff are alert to the risks learners face online, including abuse, exploitation, bullying, grooming and exposure to extremist or harmful content. Concerns about a learner's safety online are reported to the DSL.

United Apprenticeships does not supply any devices to learners or apprentices. On devices issued to United Apprenticeships staff, online safety and security are supported through the deployment of Microsoft Defender (antivirus and security) and a FortiGate web filter, with online-safety incidents reported to the DSL. In addition to training.

United Apprenticeships' provision is delivered online, and learners use their own or their employer's devices rather than any device supplied by United Apprenticeships. United Apprenticeships therefore manages learner online safety mainly through education, clear expectations and encouraging learners to report concerns, rather than by filtering or monitoring learners' own devices. Employers remain responsible for the online safety arrangements on their own systems where a learner uses them.

Artificial intelligence is part of online safety. Staff must report any AI-related safeguarding concern to the DSL without delay, using the reporting routes set out in "How to Report a Concern", and must not attempt to investigate or resolve it themselves. Concerns that must be reported include, but are not limited to:

- a nude, semi-nude, sexual or abusive image of a learner that has been digitally altered or wholly generated using artificial intelligence (a "deepfake"), whether created by a learner, an adult or an unknown person;
- a learner being impersonated, harassed, threatened or coerced using AI-generated images, audio, video or messages;
- a learner using artificial intelligence to create or share such content about another person;
- a learner being exposed to extremist, harmful or exploitative content through AI tools, or being drawn into harmful contact through AI systems that simulate human conversation, including companion and roleplay tools;
- signs that a learner is relying on artificial intelligence in place of contact with trusted adults, or has formed an emotional dependency on an AI tool, in a way that affects their wellbeing or reduces their willingness to seek help;
- any concern about the use of artificial intelligence by a member of staff, an employer or a third party in relation to a learner.

Staff should record what they saw or were told, and must not delay reporting because they are unsure whether content is AI-generated. Because United Apprenticeships' provision is delivered online and learners use their own or their employer's devices, these risks are managed mainly through education, clear expectations and reporting rather than by filtering or monitoring learners' own devices. Where United Apprenticeships uses artificial intelligence tools itself, it does so in line with the Data Protection Policy.

Wellbeing, mental health and resilience

Learner wellbeing is part of safeguarding. Staff are aware that mental health concerns can sometimes be an indicator that a learner is at risk of, or is suffering, abuse, neglect or exploitation. Apprentices and learners new to the workplace can also be particularly vulnerable to anxiety or to struggling with the transition into work. Staff are alert to changes in a learner's wellbeing, respond supportively, signpost to appropriate help, and report any safeguarding concern to the DSL. United Apprenticeships also promotes learners' wider personal development and resilience, including the promotion of fundamental British values - democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs - which supports learners to stay safe, including from extremism.

Helping learners keep themselves safe

United Apprenticeships helps learners to keep themselves safe as part of their learning and wider personal development. Through induction and across the programme, learners are supported to understand online safety, healthy relationships, sexual harassment and consent, staying safe in the workplace, and where and how to get help. For example, an external safeguarding team runs annual workshop focus groups on healthy relationships with single-sex groups of apprentices.

United Apprenticeships seeks the views of learners on safeguarding and act on what they tell us. Learner voice is gathered through activities such as the healthy-relationships focus groups and the learner surveys carried out as part of United Apprenticeships' annual external safeguarding audit, which ask learners whether they know how to raise a concern and feel confident doing so. What learners tell us informs improvements to our safeguarding arrangements.

Peer-on-Peer / Learner-on-Learner Abuse

Abuse can happen between learners. United Apprenticeships does not tolerate any form of abuse between learners and will never dismiss it as "banter" or "part of growing up". Staff should maintain an attitude of "it could happen here". It can include:

- bullying, including cyberbullying;
- physical abuse such as hitting, kicking or otherwise causing physical harm;
- sexual violence and sexual harassment, online or offline;
- coercive or controlling behaviour within relationships;
- sharing of nude or semi-nude images, and "up-skirting".
- sharing of nudes and semi-nudes that have been digitally altered or wholly generated using artificial intelligence ("deepfakes").

Any report of abuse between learners must be taken seriously and reported to the DSL, who will decide on the appropriate response, support both the learner affected and the alleged perpetrator proportionately, and involve external agencies and the police where necessary.

Allegations and Concerns About Staff

This section applies where a member of staff, volunteer or contractor has (or is alleged to have) behaved in a way that has harmed or may have harmed a learner, committed or may have committed

a criminal offence against or related to a learner, behaved towards a learner in a way that indicates they may pose a risk of harm, or behaved in a way that indicates they may not be suitable to work with children or adults at risk (including behaviour outside work - “transferable risk”).

- Allegations that may meet this threshold must be reported straight away to the case manager (normally the most senior leader). Where the allegation concerns the most senior leader, it must be reported to those charged with governance and the Local Authority Designated Officer (LADO) - the senior leader must not be informed first.
- United Apprenticeships will not carry out its own investigation before consulting the LADO (or, in serious cases, the police), so as not to prejudice any statutory investigation. The LADO should be informed within one working day of any allegation meeting the criteria.
- The welfare of the learner is paramount: where a learner has been harmed or is at immediate risk, the DSL will contact social care and, if appropriate, the police immediately.
- The member of staff will be kept informed and supported, and consideration given to whether suspension or alternative arrangements are needed - suspension is not automatic.
- Where an allegation is substantiated and the person is dismissed or would have been dismissed had they not left, United Apprenticeships has a legal duty to refer to the Disclosure and Barring Service (DBS).
- Allegations found to be malicious will be removed from personnel records. Settlement agreements will never be used to avoid an investigation or a DBS referral.

Non-recent allegations should be referred to the police, and to the LADO where the person still works with children or adults at risk.

Low-Level Concerns

In safeguarding terms, a low-level concern is any concern that an adult working in an organisation may have behaved in a way that is inconsistent with the staff code of conduct, but does not meet the harm threshold for an allegation. United Apprenticeships encourages a culture where staff feel able to share low-level concerns, including about their own conduct (self-reporting), so that they can be addressed early. Low-level concerns of this kind should be reported to the DSL or a senior leader, recorded, and reviewed for any pattern. They are kept confidential and only shared on a need-to-know basis. This should be read alongside the Staff Code of Conduct, against which such conduct is judged. Where a concern about an adult’s conduct cannot be resolved informally, or a pattern emerges, it is escalated and considered under the Allegations and Concerns About Staff section above; the senior leader acting as case manager is the ultimate decision-maker on low-level concerns about staff.

For example, **Professional Boundaries:** An adult worker or volunteer being overly friendly with a child, such as communicating via personal social media or having a "favourite" apprentice.

The term “low-level concern” above refers specifically to the conduct of an adult, in line with the KCSIE meaning. The same early, open approach applies to lower-level concerns about a learner or apprentice. These are minor worries about a learner’s welfare, wellbeing or behaviour that do not on their own meet the threshold for a safeguarding referral, such as a change in mood or presentation, a one-off comment, missed sessions or apparent difficulties at home, at work or online. Staff should not wait until they are certain: any such concern about an apprentice should be shared with the DSL and recorded, so that it can be monitored and any emerging pattern or escalation is identified and acted on promptly.

Even though these actions might just stem from inexperience, a lack of training, or poor judgment rather than malice, tracking them helps leadership identify patterns and provide support.

Safeguarding Records

Accurate, timely and secure record-keeping is an essential part of safeguarding. All safeguarding concerns, disclosures, decisions and actions, and the reasons for them, must be recorded. Records should be factual, written as soon as possible after the event, and should distinguish clearly between what was observed or reported and any professional judgement. Where relevant, records include a chronology so that emerging patterns can be identified over time.

Safeguarding records are held securely by the DSL, separately from general learner files, with access restricted to those who need it. They are treated as special category personal data and managed in line with the Data Protection Policy and data protection law. Records are retained in line with United Apprenticeships' retention schedule and only kept for as long as necessary.

Where a learner moves to another training provider, employer or education setting, the DSL ensures that relevant safeguarding information is transferred securely and promptly to the receiving organisation's safeguarding lead, so that any ongoing risk or support need is not lost. The transfer is recorded, and is carried out in a way that protects the information and complies with data protection law.

Safer Recruitment

United Apprenticeships follows safer recruitment practice to deter and prevent unsuitable people from working with learners. The detailed arrangements, including identity and right-to-work verification, references, Disclosure and Barring Service (DBS) checks, and the single central record, are set out in the separate Safer Recruitment Policy, which should be read alongside this policy.

United Apprenticeships maintains a single central record of the recruitment and suitability checks carried out on its staff, and keeps it up to date.

Staff Code of Conduct

All staff are expected to maintain professional boundaries and behave appropriately towards learners at all times, in line with staff code of conduct. This includes appropriate use of communication, social media and technology. Staff should be aware of the risk and report any concern about their own or a colleague's conduct.

Mobile phones, cameras and other personal devices must be used appropriately around learners. Staff must not use personal devices to photograph, film or message learners, and should only communicate with learners through approved United Apprenticeships channels. Any concern about the use of devices should be reported to the DSL.

To make these boundaries explicit, staff must not give their personal contact number to learners or apprentices, and must not communicate with them using personal phone numbers or personal messaging accounts. All delivery staff are provided with 8x8 softphone software, and this is the approved channel for voice and message contact with learners; staff should give learners their 8x8 contact details rather than any personal number. Staff must not accept or send social media friend requests to or from learners (for example on Facebook), and must not set up or take part in WhatsApp groups or other personal messaging groups that connect staff with learners. When United Apprenticeships staff are working in a school or other employer setting, they must also follow that setting's own mobile phone and acceptable use policy in addition to this policy.

Images of learners (photographs and video) must only be taken and used in line with this policy and the Data Protection Policy. United Apprenticeships obtains appropriate consent before taking or using images of learners for marketing, promotional or social media purposes, and a learner can decline or withdraw consent at any time. Particular care is taken with images of learners under 18 or adults at risk. Images must be taken on United Apprenticeships equipment or approved systems, or the

learner's personal device, must be stored securely, and must not be shared in any way that could identify a learner's location or put them at risk. Any concern about how images of learners have been taken, stored or used should be reported to the DSL.

Training

All staff receive safeguarding training at induction and regular updates, so they understand this policy, can recognise the signs of abuse and exploitation in both children and adults at risk, and know how to raise a concern. Each year, all staff are expected to read the Keeping Children Safe in Education (KCSIE) statutory guidance relevant to their role, in line with the annual changes to that guidance. The DSL and Deputy DSL are provided with DSL training that results in a certificate, updated in line with current requirements. Staff also receive Prevent awareness training. All staff complete their training on Smartlog, and training records are monitored and audited.

Management and Oversight of Safeguarding

Safeguarding is led by the DSL and overseen by senior leadership and those charged with governance. United Apprenticeships has arrangements for independent scrutiny of its safeguarding, so that the best interests of learners are considered and leaders are held to account. United Apprenticeships keeps accurate safeguarding records, monitors concerns and trends, and reviews the effectiveness of its safeguarding arrangements at least annually. United Apprenticeships co-operates fully with social care, the police, safeguarding partners, the Department for Education (DfE) and Ofsted as required.

Leaders maintain strategic oversight of safeguarding through regular reporting. The DSL prepares a termly safeguarding report to the Great Places to Work board, and a monthly safeguarding report to managers and the Head of Apprenticeships. The Head of Apprenticeships and the DSL also hold monthly keep-in-touch (KIT) meetings. These arrangements give senior leaders and those charged with governance ongoing oversight of safeguarding, hold leaders to account, and ensure that issues and decisions are escalated and acted on.

The DSL records and analyses safeguarding concerns to identify any themes, patterns or emerging risks. This analysis informs the safeguarding reports above and the actions leaders take, so that record-keeping drives improvement rather than simply logging individual concerns.

United Apprenticeships commissions an annual external safeguarding audit, which provides independent scrutiny of its safeguarding arrangements and includes surveys of learners. The findings of the audit feed into the safeguarding action plan and the reporting to leaders and the board, supporting continuous improvement.

Key Contacts and Local Information

The key safeguarding contacts for United Apprenticeships are set out in the Key Contacts table at the front of this policy. United Apprenticeships must keep these details up to date, make them available to all staff, learners and employers, and confirm the local safeguarding partner arrangements that apply to its provision.

Related Policies and Documents

- Whistleblowing Policy
- Attendance Policy
- Behaviour and Code of Conduct Policy
- Complaints Policy
- Data Protection Policy / Privacy Notice
- Prevent risk assessment and action plan

- Safer Recruitment Policy
- Staff code of conduct

Monitoring and Review

This policy has been made in accordance with the most recent legislation and guidance. It will be administered fairly and impartially. Safeguarding concerns and how they are handled are monitored by the DSL and senior leadership. United Apprenticeships monitors changes to relevant statutory guidance, including Keeping Children Safe in Education, and updates this policy when new versions take effect. This policy is reviewed at least annually, or sooner if legislation, statutory guidance, regulatory or funding requirements change. The owner named above is responsible for the review.

Appendix: Types of Abuse and Specific Safeguarding Issues

This appendix gives staff further information to help them recognise abuse and specific safeguarding issues. It applies to both children and, where relevant, adults at risk.

The four main types of abuse

- Physical abuse - hitting, shaking, throwing, poisoning, burning, drowning, suffocating or otherwise causing physical harm, including fabricating or inducing illness.
- Emotional abuse - persistent emotional maltreatment that causes severe and adverse effects on a person's emotional development, including making someone feel worthless, frightened or in danger, and serious bullying (including cyberbullying).
- Sexual abuse - forcing or enticing a person to take part in sexual activities, whether or not they are aware of what is happening, including contact and non-contact activities and abuse that takes place online. It is not solely perpetrated by adult males and can be committed by other children.
- Neglect - the persistent failure to meet a person's basic physical and/or psychological needs, likely to result in serious impairment of their health or development.

Specific safeguarding issues

- Child Criminal Exploitation (CCE) - where a person is coerced or manipulated into criminal activity, including transporting drugs or money through “county lines”, in exchange for something they need or want, or through threats and violence.
- Child Sexual Exploitation (CSE) - a form of sexual abuse where a person is coerced, manipulated or deceived into sexual activity in exchange for something, or for the advantage of the perpetrator. It can occur online and may appear consensual.
- County lines - criminal exploitation where gangs use individuals to move and sell drugs, often involving coercion, violence and debt bondage.
- So-called “honour”-based abuse - crimes committed to protect or defend the perceived honour of a family or community, including FGM, forced marriage and breast ironing.
- Female Genital Mutilation (FGM) - a procedure that partially or totally removes external female genitalia for non-medical reasons. It is illegal, and there is a duty to report known cases in under-18s to the police.
- Forced marriage - a marriage entered into without the full and free consent of one or both parties, using violence, threats or coercion.
- Radicalisation - the process by which a person comes to support terrorism or extremist ideologies. Staff should be alert to changes in behaviour that could indicate a person is being drawn into terrorism.
- Domestic abuse - a single incident or pattern of controlling, coercive, threatening, violent or abusive behaviour, which can be psychological, physical, sexual, financial or emotional. Learners can be victims directly or be affected by abuse in their household.
- Online abuse - abuse facilitated by technology, including grooming, sexual abuse, sharing of indecent images, bullying and exposure to harmful content.
- AI-generated abuse - the use of artificial intelligence to create, alter or share sexual or abusive images of a person without their consent, to impersonate them, or to harass, threaten or coerce them. Images that are digitally altered or wholly generated using AI (“deepfakes”) are treated in the same way as any other indecent image.
- Mental health - mental health problems can, in some cases, be an indicator that a person has suffered or is at risk of abuse, neglect or exploitation. Staff should always report concerns to the DSL.

- Additional vulnerability - learners with special educational needs and disabilities (SEND), certain health conditions, or who are otherwise more vulnerable may face additional barriers to recognising or disclosing abuse, and may be at greater risk.

Sources Considered

This policy has been developed with regard to the following legislation, statutory guidance and good-practice sources, as amended from time to time:

- Keeping Children Safe in Education (KCSIE), Department for Education - in respect of learners under 18.
- Working Together to Safeguard Children, HM Government.
- The Care Act 2014 and associated guidance - in respect of adults at risk.
- Education and Training (Welfare of Children) Act 2021.
- Prevent duty guidance for England and Wales, and the Prevent duty: safeguarding learners vulnerable to radicalisation (Home Office / DfE).
- Apprenticeship funding rules and safeguarding requirements for apprenticeship providers.
- Ofsted Education Inspection Framework and the further education and skills inspection handbook, including the requirement for effective safeguarding arrangements.
- The Children Act 1989 and 2004.
- The Equality Act 2010.
- Data protection law (UK GDPR and the Data Protection Act 2018), and DfE information-sharing advice for safeguarding.
- United Learning safeguarding policy and guidance for the wider group.
- Generative artificial intelligence (AI) in education and Generative AI: product safety expectations, Department for Education.
- Published safeguarding good practice from established apprenticeship and work-based learning providers.

Where statutory guidance is updated, this policy will be reviewed and updated accordingly.

Document History

Version	Review
1.3	June 2026
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