



# Safeguarding Policy and Procedures



## Policy Statement

This policy has been developed to ensure that all members of the APA Procurement Training Ltd (APA) team are working to safeguard and promote the welfare of all students who learn and develop with us.

This policy describes the management systems and arrangements in place to create and maintain a safe learning environment for all of our learners and staff. It identifies actions that should be taken to redress any concerns about learner or staff safety and welfare including protection from sexual abuse, from discrimination of any kind, and from extremist views, vocal or active, which are opposed to fundamental British values. All opinions or behaviours which are contrary to these fundamental values and the ethos of the organisation will be vigorously challenged.

The Director, Ian Penman, or, in their absence, the authorised member of staff (Anne Penman, Apprenticeship Programme Manager) have the ultimate responsibility for safeguarding and promoting the welfare of learners on all of our learning programmes. Safeguarding and promoting the welfare of learners goes beyond implementing basic safeguarding procedures. It is an integral part of all activities and functions, and of the culture and ethos of APA.

In accordance with guidance set out in relevant legislation and guidance, including most particularly Keeping Children Safe in Education 2025 and the Prevent duty, APA will work in partnership with other organisations where appropriate to identify any concerns about learner welfare and take action to address them.

## How we approach the safeguarding of apprentices

APA is fully committed to creating and maintaining a safe learning environment where all learners feel safe, secure and valued and know they will be listened to and taken seriously. Our organisation is committed to the principles outlined in relevant legislation and 'The Prevent duty' and government policies and implements policies, practices and procedures which promote safeguarding and the emotional, physical and mental well-being of learners and staff.

We operate a zero-tolerance approach to abuse or discrimination of any kind and ensure that we provide a safe working and learning environment where:

- The welfare of the learner is paramount.
- All learners, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have the right to equal protection from all types of harm or abuse wherever that may occur and whoever may be perpetrating it, including peer on peer abuse.
- Partnerships with learners, stakeholders and with other agencies are developed which promote a safe learning and working environment.
- Staff, learners and stakeholders have a full understanding of safeguarding which then enables them to fulfil their statutory and moral obligations.

We understand the additional statutory and ethical duty to promote the safety and welfare of adult students who are deemed to be vulnerable or 'at risk'.

## Definition of Safeguarding: Legal Framework

We are committed to understanding and implementing the requirements of safeguarding legislation and regulation for the safeguarding of all students.

We keep up with the following legislation and statutory guidance and ensure the whole team is aware of their current responsibilities to work in accordance with the principles established in the following regulation, policies and guidance:

- Keeping Children Safe in Education (2025)
- Working Together to Safeguard Children (2023)
- Counter-terrorism and Security Act (2015)
- Education Act (2011)
- Safeguarding Vulnerable Groups Act 2006
- Prevent Strategy 2011 (latest update dec 2023)
- The Care Act 2014
- The Mental Capacity Act 2005
- Human Rights Act 1998
- UK General Data Protection Regulation 2018
- Equality Act 2010 (and Amendment Regulations 2023)

## SAFEGUARDING – THE 6 PRINCIPLES

All of our safeguarding activity is guided by 6 core principles:

**Empowerment** - *We give individuals the right information about how to recognise abuse and what they can do to keep themselves safe. We give them clear and simple information about how to report abuse and crime and what support we can give. We will consult them before we take any action. .*

**Protection** - *We have effective ways of assessing and managing risk. Our complaints and reporting arrangements for abuse and suspected criminal offences are clear and widely communicated. We take responsibility for putting anyone at risk or potentially suffering from harm in touch with the right person.*

**Prevention** - *We train staff how to recognise signs and take action to prevent abuse occurring. In all our work, we consider how to make learners safer.*

**Proportionality** - *We discuss with another member of the organisation for perspective and to ensure that our thinking is correct before discussing the issue directly with the individual. Where appropriate, we consult with employers or partner agencies about what to do where there is a risk of significant harm before we take a decision. Risk is an element of many situations and should be part of any wider assessment.*

**Partnership** - *We are committed to sharing information with relevant partners. We have processes in place for sharing information and staff understand how to use these.*

**Accountability** - *The roles of all staff members and other stakeholders are clear, together with the lines of accountability. Staff understand what is expected of them and others.*

We give priority to ensuring that our safeguarding provision is of high quality. Directors take a strong lead, with responsibility and accountability for safeguarding arrangements identified clearly through the Designated Safeguarding Lead.

This safeguarding policy details clear procedures which apply when providing services or activities directly under the management of APA Procurement and Supply Training staff and all services and activities that come under the responsibility of the training provider. It covers the approach to training in both centre-based and employment-based settings and incorporates how employers should be guided in meeting safeguarding requirements.

## Scope and Responsibilities

Our safeguarding policy applies to all staff, including directors, contractors, agency staff, employees and anyone that may work on behalf of APA Procurement and Supply Training. All are responsible for safeguarding and promoting the welfare of learners.

All staff who come into contact with learners in their work have a duty to safeguard and promote their welfare. Staff are trained to understand their responsibilities and be aware of the signs of abuse and neglect and extremism and radicalisation so that they are able to identify where individuals may be in need of help or protection.

Staff working at APA are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned and to work on the basis that learners may experience discrimination or abuse at any time. When concerned about the welfare of a learner, staff members should always act in the interest of that student. Failure to comply with these responsibilities will be seen as a serious matter which may lead to disciplinary action.

Staff are expected to:

- attend safeguarding training as required (every 2 years)
- familiarise themselves with the Safeguarding policy and associated procedures
- prioritise learner safeguarding and welfare
- keep up to date with the latest guidance in Part 1 of Keeping Children Safe in Education
- alert the Designated Safeguarding Lead if they have concerns about a learner

The Designated Safeguarding Lead is Ian Penman. This postholder has a specific responsibility for championing the importance of safeguarding and promoting the welfare of learners registered with APA. The Designated Safeguarding Lead will:

- Act as the first point of contact with regards to all safeguarding matters.
- Attend up-dated training every two years.
- Oversee support and training for staff.
- Support staff to follow up on any concerns about learner safety or wellbeing and make referrals to relevant agencies where required.
- Keep copies of all referrals to agencies related to safeguarding.
- Ensure that all staff and learners receive information on safeguarding policies and procedures from the point of induction.
- Manage and keep secure APA's safeguarding records.
- Ensure that all staff understand and are aware of APA's reporting and recording procedures and are clear about what to do if they have a concern about a learner.
- Liaise with the other Directors and staff about any safeguarding issues.
- Ensure that the Safeguarding Policy is regularly reviewed and updated.
- Keep up to date with changes in policy and procedures and be aware of any guidance issued concerning Safeguarding and Prevent.

## SAFER RECRUITMENT OF STAFF

APA operates a safer recruitment process which aims to recruit staff that are committed to providing learners with a safe and healthy environment. The recruitment process aims to select staff who share in the belief that the welfare of the learner is paramount and promote this through all that they do.

APA undertakes to ensure that their staff are fit to work in a training provider setting with vulnerable adults. It also reserves the right to refuse to employ staff whom it has a reasonable belief may pose a risk to its learners.

APA has systems in place to prevent unsuitable people from working with vulnerable adults and to promote safe practice. These systems apply to all new staff and require the following checks to be made prior to appointment:

- a minimum of two references, satisfactory to APA, one of which should be from a previous employer or supervisor
- documentary evidence checks of identity, nationality, residency and "right to work" status
- evidence of qualifications
- checks on social media and online activity

All staff are subject to DBS checks and for those who directly tutor or have regular contact with learners we require an enhanced DBS check to be completed. In addition, new appointees will be required to satisfactorily complete a probationary period. In accordance with the Regulations, records of all checks carried out are kept in a single central record.

Safeguarding training is a feature of new staff induction. New staff are briefed on safeguarding responsibilities, policies and procedures and asked to read Part 1 of Keeping Children Safe in Education 2025. They are also required to complete external safeguarding training and the latest version of the Home Office's Prevent Duty training to ensure that they can demonstrate competence in the latest skills and knowledge.

## SAFER RECRUITMENT OF APPRENTICES

APA undertakes to ensure that its learners are suitable to study in a training provider setting. We operate an extensive onboarding process that involves interviews and checks on learners.

We reserve the right to refuse entry to any applicants whom it has a reasonable belief may pose a risk to apprentices or other learners.

## STAFF DEVELOPMENT AND TRAINING

We are committed to providing staff, learners and stakeholders with appropriate training and awareness raising activity around safeguarding. We provide training at a level and frequency that reinforces our safeguarding culture and ensures that staff comply with policy and procedures and promote a safe learning environment.

APA's Safeguarding policy, procedure and accompanying guidance are issued to all new staff as part of their induction. Our induction process for learners includes a full explanation of safeguarding policy and practices. To reinforce this, all students receive a Student Handbook which explains our zero-tolerance policy on any form of abuse and harm and directs them to our complete safeguarding policy for full guidance on rights, responsibilities and reporting procedures.

All staff will be supported to recognise warning signs and symptoms in relation to specific safeguarding issues and will receive training or briefings on current and latest safeguarding issues such as Domestic Abuse, Sexual exploitation, Trafficking and Preventing Violent Extremism through mandatory Safeguarding training and discussions, meetings and briefings.

As part of our responsibility to ensure the health, safety and welfare of all students who learn with us, we ensure that employers are aware of this policy and of their own responsibilities. From the outset of their placement of employees on our courses, we explain and reinforce their role in Safeguarding and the Prevent duty and that arrangements are in place to ensure each learner's wellbeing is safeguarded.

If staff members have any concerns about a learner, this must be referred to the Designated Safeguarding Lead to agree a course of action (see section on Procedure below). Records of safeguarding issues will be kept centrally. These will be in

accordance with data protection regulations and only accessible by the senior management team and any referring bodies. Records will be destroyed after 3 years.

We ensure that all staff, including those in a non-teaching role, have a good understanding of safeguarding, how to recognise the signs of neglect or abuse and what to do in the case of such concerns arising.

We will undertake safeguarding risk assessments as necessary and ensure that these are stored centrally for access and use by all staff.

Staff are trained in safeguarding procedures so they are confident and well equipped to promote safeguarding in a sensible and proportionate way. This includes instruction on communication to learners so that they can in turn relay the policy and respond to any questions or concerns.

We monitor and respond as appropriate to any safeguarding concerns raised or brought to our attention by either the student, employer, the apprentice or a third party. We teach the importance of safeguarding and providing a safe approach to reporting of any concerns of abuses as part of our syllabus so that students have the confidence to know that their concerns will be listened to and acted upon.

We recognise that safeguarding is not just about protecting students from deliberate harm, neglect and failure to act. It relates to the broader aspects of care and education and the following procedures should be read in conjunction with this policy:

- Mental
- Digital Safeguarding Policy
- Health and Safety Policy
- Recruitment Policy

All official visitors to the training centre are required to report to the main reception on arrival and sign in. Visitors are asked to wait in reception until they are collected by a member of Training Centre staff.

We advise on the confidentiality of sharing information and provide assurance that this will not be discussed outside of the senior management team who provide direct help and support, unless we are informed or identify an imminent risk of harm.

## Safeguarding Procedures

APA Procurement and Supply Training have clear procedures for managing safeguarding concerns and issues and for reporting and referring onwards to partners and external agencies where required.

**Reporting:** Any incidence or alleged incidence of abuse whatever the nature must be reported to the Designated Safeguarding Lead. In the event of this not being

possible, staff members should report incidents to the Apprentice Programmes Manager Anne Penman, or to APA Operations Manager and Deputy Designated Safeguarding Lead Greta Hutchinison. In all cases, whoever receives the report will, without delay, having carefully recorded any testimony, ensure that joint action be taken in partnership with the staff member and learner to put in place preventative measures to stop any possible abuse from continuing. The DSL will then work together with staff, the learner where possible and any relevant external or partner agencies to establish an action plan to address the issues for the longer-term benefit of the learner impacted and for the wider learning community.

**Recording:** We will record any alleged incidences or alleged incidences of abuse or discrimination whatever the nature in the 'Safeguarding Record and Action Plan'. The record will be accurate in terms of time, date, location and events or actions involved. This may include quotations and should also, if appropriate, include factual observations about the physical and emotional state of the learner impacted or sharing their concerns. The information is stored securely, in line with this Safeguarding Policy Document.

The Designated Safeguarding Lead, with support from the Deputy DSL where appropriate, will take responsibility for decisions to refer a complaint or allegation, having gathered and examined all relevant testimony and information, to the relevant Safeguarding Authority. If for any reason the postholder is not available and the concerns are of an urgent nature, then a decision on referrals should be taken by the Apprenticeship Manager Anne Penman or the Deputy DSL Greta Hutchinison.

#### WHAT TO DO IF YOU SUSPECT SOMEONE IS BEING ABUSED

All staff and contractors working in direct contact with apprentices at APA must be alert to the signs of abuse. Anyone who suspects that abuse is taking place inside or outside of APA training provision, or to whom an apprentice discloses issues relating to safeguarding, should contact the Designated Safeguarding Lead immediately.

Staff who are approached with concerns about safeguarding a child or vulnerable adult, must bring the concerns raised to the attention of the Designated Safeguarding Lead immediately.

All staff to whom an apprentice discloses issues that may be related to safeguarding must keep written records of concerns. Such records must be kept securely, separate from the main learner files and in secure locations.

#### ALLEGATIONS OF ABUSE AGAINST MEMBERS OF STAFF

It is fundamentally important that all staff feel free and confident about raising safeguarding concerns about any other member of staff working for the organisation. These may be about how that member of staff interacts with learners or they may be about concerns for the safety of the staff member themselves. Either way, any concerns that any staff member may have about another staff

member should be raised with the Designated Safeguarding Lead as quickly as possible. Any concerns raised or allegations made will be in strictest confidence and will always be treated seriously.

Sometimes the issues that are the subject of concerns are clear. It is important even where the issues are not clear, that concerns are still reported. These are sometimes referred to as 'low level concerns'. Just because concerns may seem 'low-level' does not mean that they are insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease - that a member of staff may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of the learning environment and outside of work. Examples of such behaviour could include, but are not limited to: being over friendly with learners, having favourites, engaging with a learner on a one-to-one basis outside of work, using discriminatory or derogatory language. These concerns may arise in a number of ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a learner, employer, or other adult within or outside of the organisation.

In response to any concerns raised about members of staff, the Designated Safeguarding Lead will follow the Safeguarding Procedure in the same way as for safeguarding concerns about learners. All concerns will be recorded confidentially and stored in a restricted access folder, the issues will be carefully considered and an action plan will be established to follow up with the staff member concerned, with reference to external agencies. This may result in criminal (police) investigations and/or a child/vulnerable adult's protection investigation, carried out by Social Services. The priority in any case will be to ensure the safety of learners, other staff members and any others who may be at risk.

If the concern is about the Apprenticeship Manager or the Designated Safeguarding Lead, then reporting should be made direct to Deputy Designated Safeguarding Lead Greta Hutchinson who will ensure that appropriate action is taken along the same lines. Alternatively, concerns may be reported direct to the Department For Education or to the Chartered Institute of Procurement and Supply (CIPS) both of whom oversee and regulate the training provision of APA Procurement Training.

## RESIGNATIONS

If, during the course of an investigation relating to safeguarding, an employee tenders his or her resignation, or ceases to provide their services, APA is not prevented from following up an allegation in accordance with these procedures.

Every effort will be made to reach a conclusion in cases relating to the welfare of apprentices including those where the person concerned refuses to co-operate with the process.

Any substantiated allegations will be reported to the Disclosure and Barring Service.

## Prevent Duty

### RADICALISM AND EXTREMISM

APA values the fundamental rights of freedom of speech, expression of beliefs and ideology and tolerance of others which are the core values of our democratic society. However, all rights come with responsibilities and free speech or beliefs designed to manipulate the vulnerable or which advocate harm or hatred towards others will not be tolerated.

APA seeks to protect its apprentices, other learners and staff from all messages and forms of violent extremism and ideologies including those linked to, but not restricted, to the following: Far Right/Neo Nazi, White Supremacist ideology, Islamist ideology, Irish Nationalist and Loyalist paramilitary groups and extremist Animal Rights groups.

APA is clear that exploitation and radicalisation will be viewed as a safeguarding concern and will be referred to the appropriate safeguarding agencies.

As a training provider, it is essential that our staff are able to identify people who may be vulnerable to radicalisation and that they also know what to do when they are identified. We are also required to protect young people from the risk of radicalisation as part of our safeguarding duties in order to protect them from harm.

Our staff are trained to identify whether the employers and subcontractors we work with are not linked to any extremist activity or organisations by completing an initial online monitoring activity and in discussions with managers and human resources.

If they suspect any activity they are not happy with they will report this immediately to our Designated Safeguarding and Prevent Lead – Ian Penman.

In order to prevent the risk of radicalisation we also promote fundamental British values, enabling young people to challenge extremist views.

All staff receive training on their responsibilities under the Prevent duty at induction, which is regularly updated and re-enforced during their employment, through both internal and external training. We ensure that staff and students are aware of and can recognise the potential risks of radicalisation/ involvement in violent or non-violent extremist activities and will support anyone thought to be at risk of becoming involved.

All Apprentices will receive training during their induction and this is reinforced with discussions during progress reviews and during different opportunities during training. We work with apprentices, employers and our own staff to support the Government's Prevent agenda and ensure safeguarding is in place for all our learners.

We have incorporated the Prevent strategy into our Safeguarding policy and procedures covering staff, learners, learning and infrastructure (and use of premises), in line with the requirements placed upon us under the Government's guidance on Prevent and the Counter-Terrorism and Security Act (2015).

We do not use subcontractors and if we were to so do in the future we will put in place appropriate measures to ensure that they are properly checked and evaluated before appointment.

As part of our regular review of our suppliers, we continue to check for potential links with any organisations whose values may not correspond with those of our organisation or the society in which we operate. Through this process we have determined that we do not inadvertently fund extremist organisations.

## **Policy Information & Review**

This Safeguarding policy is reviewed annually or in line with legislative changes. This Safeguarding Policy should be read in conjunction with the following policies:

- APA Digital Safeguarding Policy
- APA Mental Health Safeguarding Policy

**Approved by the Senior Management Team APA.**

Last reviewed December 2025.