

Document Control

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1. Policy statement

Supply Chain Academy Ltd is committed to safeguarding and promoting the welfare of all apprentices and learners.

Safeguarding is everyone's responsibility. All staff, contractors, associates, employers and delivery partners must act in the best interests of learners, remain alert to safeguarding concerns and take prompt action where concerns arise.

For the purposes of this policy:

- a child is any person under the age of 18;
- an adult at risk is an adult who has care and support needs, is experiencing or is at risk of abuse or neglect, and is unable to protect themselves because of those needs;
- safeguarding applies to all learners, while statutory child-protection arrangements apply specifically to learners under 18;
- adult safeguarding concerns will be managed under relevant Care Act 2014 arrangements.

Supply Chain Academy Ltd recognises that safeguarding includes:

- providing help and support as soon as problems emerge;
- protecting learners from maltreatment, abuse, neglect and exploitation;
- protecting learners from harm inside and outside the home, including online;
- preventing impairment of physical or mental health and development;
- ensuring learners are supported in safe and effective learning and workplace environments;
- taking action to enable learners to achieve the best possible outcomes;
- preventing learners from being drawn into terrorism under the Prevent duty.

Safeguarding and Prevent are managed through an integrated process, while recognising that different referral routes and statutory thresholds may apply.

2. Scope

This policy applies to:

- all employees;
- directors and senior leaders;
- tutors, trainers, assessors and coaches;
- agency staff;
- contractors, consultants and associates;
- volunteers;
- subcontractors and delivery partners;
- employers involved in apprenticeship delivery;
- all apprentices and learners;
- all delivery settings.

It applies to:

- remote teaching through Microsoft Teams;
- communications through Aptem;
- workplace learning;
- off-the-job training;
- learner reviews;
- employer premises;
- home-based learning;
- online and social media interactions connected to the programme;
- visits, events and external activities;
- partnership and subcontracted delivery.

3. Legal and regulatory framework

This policy has been prepared with regard to:

- Keeping Children Safe in Education 2026;
- Working Together to Safeguard Children;
- Children Act 1989;
- Children Act 2004;
- Education Act 2002, where applicable;
- Apprenticeships, Skills, Children and Learning Act 2009, as amended;
- Care Act 2014;
- Counter-Terrorism and Security Act 2015;
- Prevent duty guidance;
- Human Rights Act 1998;
- Equality Act 2010;
- Data Protection Act 2018;
- UK General Data Protection Regulation;
- Data (Use and Access) Act 2025;
- Rehabilitation of Offenders Act 1974;
- Safeguarding Vulnerable Groups Act 2006;
- relevant Disclosure and Barring Service requirements;
- current apprenticeship funding rules;
- current Ofsted Further Education and Skills inspection arrangements.

Keeping Children Safe in Education 2026 applies to Independent Training Providers in relation to children receiving education or training. It comes into force on 1 September 2026.

This policy will be checked against the final published version of KCSIE 2026 before implementation and amended if required.

4. Key safeguarding contacts

Designated Safeguarding Lead

Name: Sara Rye

Email: studentwelfare@supplychainacademy.org.uk

Telephone: 07754 899860

Deputy Designated Safeguarding Lead

Name: Michelle Carter

Email: studentwelfare@supplychainacademy.org.uk

Telephone: 07561 512840

Senior leader for allegations concerning the DSL

Name: Makayla Whyte

Email: mkw@supplychainacademy.org.uk

Telephone: 07860 634396

Governance or ownership contact for allegations concerning the most senior leader

Name: [Insert name]

Email: [Insert email]

Telephone: [Insert telephone]

Emergency contacts

- Police, ambulance or immediate danger: 999
- Police non-emergency: 101
- NHS urgent mental-health support: 111
- Local authority children's social care: [Insert local arrangements]
- Local authority adult safeguarding: [Insert local arrangements]
- Local Authority Designated Officer: [Insert contact]
- Local Prevent team: [Insert contact]
- Prevent referral route: [Insert local route]

Because learners are geographically dispersed, the DSL will maintain current referral details for each learner's home local authority and, where relevant, the employer's local authority.

5. Safeguarding principles

Supply Chain Academy Ltd will:

- maintain a learner-centred approach;
- act in the best interests of children and vulnerable adults;
- maintain an attitude that safeguarding concerns could arise within any setting;
- listen to learners and take their concerns seriously;
- avoid making assumptions based on identity, culture, religion, disability, sex, sexuality or background;
- intervene early;
- share information where necessary to protect a learner;
- work with statutory and non-statutory agencies;

- support staff to exercise professional curiosity;
- challenge unsafe, abusive, discriminatory or harmful behaviour;
- review safeguarding practice using concerns, trends, learner voice and quality assurance.

The absence of reported concerns will not be treated as evidence that abuse is not occurring.

6. Roles and responsibilities

6.1 Senior leaders and governance

Senior leaders and those with governance or ownership responsibility will:

- approve this policy annually;
- ensure safeguarding is prioritised across the organisation;
- appoint an appropriately trained DSL and deputy;
- ensure sufficient time, authority, resources and support for the DSL function;
- ensure safeguarding arrangements are effective across remote, workplace and partnership delivery;
- review anonymised safeguarding data, themes and trends;
- monitor safer recruitment arrangements;
- oversee online safety and filtering and monitoring arrangements;
- ensure staff understand and follow safeguarding procedures;
- scrutinise employer and partner safeguarding assurance;
- ensure safeguarding concerns are not treated solely as quality, attendance, performance or funding matters;
- ensure appropriate action is taken where practice falls below expected standards.

6.2 Designated Safeguarding Lead

The DSL has lead responsibility for safeguarding and child protection.

The DSL will:

- manage safeguarding and Prevent concerns;
- advise staff on appropriate action;
- make or oversee referrals;
- liaise with children's social care, adult safeguarding, police, LADO, Prevent and other agencies;
- ensure urgent concerns receive immediate attention;
- maintain accurate and secure safeguarding records;
- review patterns, themes and emerging risks;
- ensure learner wishes and views are considered;
- oversee support and safety planning;
- work with employers and delivery partners;
- maintain local referral information;
- ensure safeguarding information is shared appropriately;
- ensure child-protection files are transferred securely where required;
- provide safeguarding advice to staff;
- promote safeguarding awareness across the curriculum;

- report safeguarding themes and effectiveness to senior leaders;
- maintain professional development and current knowledge.

The DSL retains lead responsibility even where activities are delegated.

6.3 Deputy Designated Safeguarding Lead

The deputy will:

- be trained to the same standard required for the DSL role;
- support the DSL;
- act in the DSL's absence;
- have access to relevant safeguarding information;
- understand referral routes and escalation arrangements.

The DSL remains accountable for the safeguarding function.

6.4 DSL availability

A trained DSL or deputy will be available during normal training and business hours.

Staff will be provided with:

- DSL and deputy contact details;
- arrangements for urgent remote-delivery concerns;
- out-of-hours and emergency routes;
- escalation arrangements if named safeguarding staff cannot be reached.

A concern must never be delayed because the DSL is unavailable.

6.5 All staff

All staff must:

- read and understand this policy;
- read Part One of KCSIE 2026;
- complete safeguarding and Prevent training;
- understand online safety responsibilities;
- know how to report concerns;
- act immediately where a learner may be at risk;
- never promise confidentiality;
- record concerns accurately;
- use the learner's own words where possible;
- maintain professional curiosity;
- challenge inappropriate conduct;
- escalate if they believe insufficient action has been taken;
- cooperate with safeguarding enquiries and external agencies.

6.6 Employers

Employers must:

- provide a safe working environment;
- identify a safeguarding contact;
- understand SCA's reporting arrangements;
- report concerns promptly;
- notify SCA about serious incidents affecting an apprentice;
- inform SCA of unexplained absence, significant disengagement or sudden welfare changes;
- cooperate with safeguarding enquiries;
- support reasonable safety and support plans;
- address bullying, harassment, discrimination and harmful workplace culture;
- risk assess arrangements for apprentices under 18;
- not conduct an independent safeguarding investigation without agreement from the DSL where this may compromise evidence or place a learner at further risk.

7. Staff induction, training and awareness

All staff will receive safeguarding and child-protection training at induction.

Induction will include:

- this policy;
- Part One of KCSIE 2026;
- staff code of conduct;
- low-level concerns;
- allegations against staff;
- whistleblowing;
- online safety;
- filtering and monitoring responsibilities;
- Prevent;
- child-on-child abuse;
- reporting routes;
- DSL and deputy details;
- procedures for learners absent from training;
- remote-delivery risks;
- employer and workplace safeguarding.

All staff will receive:

- regular safeguarding updates;
- at least annual refresher training;
- Prevent updates;
- online safety updates;
- scenario-based learning;
- briefings on emerging risks;
- confirmation that they have understood their responsibilities.

The DSL and deputy will receive enhanced safeguarding and Prevent training at least every two years, with knowledge and skills refreshed regularly.

8. Recognising safeguarding concerns

Safeguarding concerns may arise from a single event or a pattern of behaviour. Different forms of abuse, neglect and exploitation often overlap.

Staff must remain alert to:

- physical abuse;
- emotional abuse;
- sexual abuse;
- neglect;
- child-on-child abuse;
- harmful sexual behaviour;
- sexual harassment and sexual violence;
- child criminal exploitation;
- child sexual exploitation;
- county lines;
- modern slavery and trafficking;
- financial exploitation;
- domestic abuse;
- teenage relationship abuse;
- child-to-parent or caregiver abuse;
- forced marriage;
- female genital mutilation;
- honour- or faith-based abuse;
- bullying and cyberbullying;
- prejudice-based and discriminatory abuse;
- serious violence;
- weapons;
- radicalisation;
- mental-health concerns;
- self-harm;
- suicidal ideation;
- substance misuse;
- online grooming;
- harmful online content;
- conspiracy theories and extremist content;
- nudes and semi-nudes;
- AI-generated sexual imagery;
- homelessness;
- missing education or training;
- abuse within workplace settings;
- abuse outside the family;
- risks linked to disability, SEND or communication needs.

Staff must consider the learner's wider context, including:

- home circumstances;
- employer environment;
- peer relationships;
- online activity;
- attendance and engagement;
- mental and physical health;
- prior safeguarding concerns;
- protective factors;
- local risks;
- travel, shift and lone-working arrangements.

9. Learners who may require additional support

Any learner may require early support. Staff should be particularly alert where a child:

- has special educational needs or disabilities;
- has communication difficulties;
- has a mental-health need;
- is a young carer;
- is pregnant or a parent;
- is experiencing domestic abuse;
- is involved in antisocial or criminal behaviour;
- is at risk of exploitation or trafficking;
- is repeatedly absent from learning or work;
- is misusing alcohol or drugs;
- has a parent or carer in custody;
- is at risk of radicalisation;
- is privately fostered;
- is affected by homelessness or unstable accommodation;
- has experienced suspension, exclusion or disrupted education;
- is showing early signs of harmful or abusive behaviour;
- is socially isolated;
- is subject to discrimination;
- is working in a high-risk or poorly supervised employer setting.

Support needs must not be allowed to obscure safeguarding risks.

10. Reporting safeguarding concerns

10.1 Immediate action

All safeguarding concerns must be reported immediately and without delay.

The written Safeguarding and Prevent Concern Form should be completed as soon as practicable and ordinarily within two hours.

Completing a form must never delay:

- emergency action;
- a referral;

- contacting the police;
- obtaining medical help;
- protecting the learner or another person.

10.2 Staff response to a disclosure

Staff should:

- listen carefully;
- remain calm;
- take the learner seriously;
- reassure the learner that they have done the right thing;
- explain that information may need to be shared;
- avoid promising confidentiality;
- avoid leading questions;
- use open prompts such as “tell”, “explain” and “describe”;
- record the learner’s own words;
- avoid investigating;
- preserve evidence;
- contact the DSL immediately.

Staff should not:

- confront an alleged perpetrator;
- ask the learner to repeat their account unnecessarily;
- make judgements or promises about outcomes;
- tell people who do not need to know;
- delay reporting to obtain more information.

10.3 Direct referrals

Any staff member may make a referral to children’s social care or emergency services where necessary.

Where a direct referral is made, the DSL must be informed as soon as possible, unless doing so would create an additional risk.

10.4 Escalation

Staff must escalate concerns where:

- they cannot contact the DSL or deputy;
- they believe the response is inadequate;
- the learner remains at risk;
- there is disagreement about thresholds;
- a referral is not accepted but concerns remain;
- an employer or partner does not act appropriately.

Staff should follow local escalation and professional disagreement procedures.

11. Safeguarding decision-making and thresholds

The DSL will assess:

- immediate danger;
- the learner's age;
- nature and seriousness of the concern;
- frequency and pattern;
- vulnerability factors;
- protective factors;
- risk to others;
- home and workplace context;
- online elements;
- previous concerns;
- local authority thresholds;
- the learner's wishes and feelings;
- whether parents or carers should be informed;
- whether one or more agencies are required.

Possible actions include:

- internal pastoral or welfare support;
- universal or community-based support;
- community-based early help;
- targeted Family Help;
- referral under section 17 of the Children Act 1989;
- referral under section 47 of the Children Act 1989;
- adult safeguarding referral;
- Prevent referral;
- police referral;
- urgent medical or mental-health support;
- employer safety action;
- partnership escalation;
- ongoing monitoring and review.

The organisation's internal risk categories are an aid to decision-making only. They do not replace local authority thresholds, statutory guidance or professional judgement.

12. Family Help and early support

Staff should identify concerns early and consider what support may prevent escalation.

For a learner under 18, support may include:

- internal learner support;
- community-based early help;
- targeted Family Help;
- support from health services;
- mental-health support;
- housing support;
- substance misuse support;
- SEND support;

- employer adjustments;
- multi-agency assessment.

The DSL will consider:

- the level of need;
- whether the child may be in need under section 17;
- whether there is reasonable cause to suspect significant harm under section 47;
- whether a Family Help assessment is appropriate;
- whether delay would increase risk.

The reasons for decisions must be recorded.

13. Parents and carers

For learners under 18, the DSL will normally consider informing parents or carers about concerns and support.

Parents or carers may not be informed where:

- doing so may place the child at greater risk;
- it may prejudice a police or social-care investigation;
- it may expose the child to coercion, abuse or retaliation;
- the concern relates to a parent or carer;
- professional advice indicates that information should not be shared at that stage;
- it would not be in the child's best interests.

The decision and rationale must be recorded.

14. Child-on-child abuse

Children can abuse other children inside or outside education, in workplaces and online.

Child-on-child abuse may include:

- bullying;
- cyberbullying;
- discriminatory abuse;
- abuse in intimate relationships;
- physical assault;
- threats involving weapons;
- sexual violence;
- sexual harassment;
- harmful sexual behaviour;
- coercive sexual behaviour;
- nudes and semi-nudes;
- upskirting;
- initiation or hazing;
- online abuse;
- abusive group chats;
- misogynistic or misandrist abuse;
- pressure, blackmail or humiliation.

The organisation will not dismiss abusive behaviour as:

- banter;
- joking;
- part of growing up;
- normal workplace behaviour;
- boys being boys;
- harmless online activity.

The absence of reports does not mean abuse is not happening.

All concerns will be considered in relation to:

- the victim;
- the alleged perpetrator;
- other learners;
- workplace colleagues;
- wider safeguarding risks.

Both the victim and alleged perpetrator may require safeguarding support.

15. Harmful sexual behaviour, sexual harassment and sexual violence

Reports will be taken seriously and acted upon immediately.

The DSL will consider:

- immediate safety;
- medical needs;
- police involvement;
- children's social care;
- preservation of evidence;
- contact between the parties;
- workplace or learning arrangements;
- remote communication restrictions;
- risk to other learners;
- support for the victim;
- support and safeguarding for the alleged perpetrator;
- parental involvement;
- ongoing safety planning;
- review arrangements.

The learner's preferred terminology should be considered. Not every person who has experienced abuse will wish to be described as a victim.

A report may relate to conduct:

- at work;
- during training;
- outside training;
- on Teams;
- through Aptom;
- on social media;

- in a group chat;
- between learners at different employers.

The organisation will not require the victim and alleged perpetrator to work or learn together where this creates an unmanaged risk.

16. Nudes, semi-nudes and AI-generated sexual imagery

Any incident involving the making or sharing of nude or semi-nude imagery of a person under 18 requires a safeguarding response.

This includes imagery:

- created by the child;
- created by another person;
- altered digitally;
- created wholly or partly using artificial intelligence;
- described as a deepfake or deep nude;
- shared consensually or non-consensually;
- used for coercion, blackmail, bullying or humiliation.

Staff must:

- report the concern immediately;
- not ask the learner to send or show the image;
- not copy, print, forward, save or share it;
- not search for further images;
- preserve relevant contextual evidence without viewing the image unnecessarily;
- follow DSL instructions and current UKCIS guidance.

The DSL will consider:

- the age of those involved;
- coercion;
- exploitation;
- power imbalance;
- repeat sharing;
- threats;
- adult involvement;
- criminality;
- risk of further circulation;
- police or social-care referral.

KCSIE 2026 expressly includes digitally altered and wholly AI-generated nude or semi-nude images.

17. Online safety

Online safety is an integral part of safeguarding.

SCA will address:

- content risks;
- contact risks;
- conduct risks;
- commerce risks;
- grooming;
- online sexual harm;
- extremist content;
- misinformation;
- conspiracy theories;
- cyberbullying;
- impersonation;
- harassment;
- fraud;
- exploitation;
- AI-generated abuse;
- harmful group chats;
- misuse of Teams and Aptom.

The organisation will:

- maintain an Online Safety Policy;
- train staff and learners;
- explain reporting routes;
- review filtering and monitoring arrangements at least annually;
- assign clear responsibilities;
- respond to alerts promptly;
- review remote delivery risks;
- promote critical thinking and digital resilience;
- address employer-owned and personal devices through employer agreements and learner guidance;
- ensure learners know how to report online harm.

The organisation's risk register identifies online safety, under-18 learners, employer settings and dispersed learner locations as priority risks.

18. Mental health, self-harm and suicide risk

Mental-health concerns may become safeguarding concerns or indicate abuse, neglect or exploitation.

Staff should not diagnose mental-health conditions.

Staff must report concerns where a learner:

- is self-harming;

- expresses suicidal thoughts;
- has made a suicide plan;
- shows a significant behavioural change;
- becomes withdrawn or isolated;
- shows signs of severe distress;
- reports abuse or exploitation;
- appears unable to keep themselves safe.

Where there is immediate danger:

- call 999;
- arrange urgent medical assistance;
- ensure the learner is not left alone where safe and appropriate;
- inform the DSL.

Urgent but non-emergency mental-health support may be sought through NHS 111 or local services.

Pastoral support must not replace a safeguarding referral where thresholds are met.

19. Serious violence and weapons

Any concern involving:

- carrying a weapon;
- threats involving a weapon;
- serious assault;
- threats of serious harm;
- fixation with mass violence;
- targeted violence;
- criminal exploitation;
- planned violent action,

must be reported immediately.

The DSL will assess:

- risk to the learner;
- risk to others;
- police involvement;
- safeguarding needs;
- employer and workplace safety;
- need for a safety and support plan;
- peer conflict;
- exploitation or coercion.

Immediate danger or suspected criminal planning requires police contact.

20. Female genital mutilation

All staff must report concerns about FGM to the DSL.

Where a teacher discovers that an act of FGM appears to have been carried out on a girl

under 18, the teacher must follow the statutory duty to report directly to the police. The DSL should also be informed.

21. Prevent and radicalisation

Prevent is part of safeguarding.

Staff must remain alert to signs that a learner may be susceptible to radicalisation, including:

- isolation;
- significant behavioural change;
- extremist content;
- conspiracy narratives;
- dehumanising language;
- persistent intolerance;
- support for terrorist violence;
- interest in extremist groups;
- fixation with targeted or mass violence;
- contact with individuals promoting violent ideology;
- plans to travel to a conflict zone;
- production or sharing of terrorist material.

There is no single route to radicalisation. Indicators must be considered alongside:

- vulnerability factors;
- contextual factors;
- protective factors;
- learner behaviour;
- online activity;
- workplace context;
- prior concerns.

The DSL will use a proportionate risk-based approach.

Where there is doubt, advice should be sought from the local Prevent team and a referral considered.

Where a learner is in immediate danger, involved in planned criminal activity or presents a risk to others, the police must be contacted immediately.

reasons. This reflects the government guidance on managing radicalisation risk.

22. Learners absent from education, training or work

Repeated or prolonged absence may indicate safeguarding risk.

Staff must consider safeguarding where there is:

- unexplained absence from Teams sessions;
- non-attendance at off-the-job training;
- sudden disengagement from Aptem;

- inability to contact the learner;
- unexplained absence from the employer;
- repeated missed reviews;
- withdrawal without a confirmed destination;
- a significant change in attendance or behaviour;
- concern about exploitation, abuse, mental health or radicalisation.

Attendance concerns must not be managed solely as performance or funding issues.

Tutors and reviewers must escalate to the DSL where:

- absence is unusual;
- contact attempts fail;
- the employer also cannot account for the learner;
- vulnerability is known;
- there are associated welfare concerns;
- a child may be missing from education or at risk.

23. Employer settings and work-based learning

SCA recognises that apprentices may be exposed to safeguarding risks in employer settings.

These may include:

- bullying;
- discriminatory behaviour;
- sexual harassment;
- harmful workplace culture;
- exposure to extremist views;
- exploitation;
- unsafe lone working;
- inappropriate adult relationships;
- unsafe travel;
- unsuitable shift patterns;
- modern slavery;
- poor supervision;
- online abuse;
- pressure not to report concerns.

For apprentices under 18, SCA and the employer will consider:

- age-appropriate supervision;
- workplace risk assessment;
- safeguarding contacts;
- travel and shift patterns;
- lone working;
- access to adults;
- hazardous environments;
- accommodation where relevant;

- reporting and escalation arrangements.

Safeguarding will be discussed during employer engagement and progress reviews.

24. Partnership, subcontracted and main-provider arrangements

Where SCA delivers as a partner or subcontractor:

- safeguarding responsibilities will be documented;
- SCA will manage immediate concerns through its own procedures;
- relevant concerns will be shared with the main provider;
- urgent action will not be delayed while responsibilities are clarified;
- joint decision-making will take place where appropriate;
- information will be shared securely and proportionately;
- staff will understand both organisations' escalation routes;
- the higher safeguarding standard will be applied where procedures differ;
- the main provider's overall accountability will not remove SCA's responsibility for day-to-day safeguarding.

Partnership agreements must identify:

- named safeguarding contacts;
- referral responsibilities;
- reporting timescales;
- information-sharing arrangements;
- case-management responsibility;
- escalation routes;
- quality-assurance arrangements.

25. Information sharing

Information will be shared where necessary to safeguard a learner.

Data-protection law is not a barrier to justified safeguarding information sharing.

Information sharing will be:

- necessary;
- proportionate;
- relevant;
- accurate;
- timely;
- secure;
- limited to those who need to know.

Consent is not always required where sharing is necessary to protect a child or another person.

The DSL will record:

- what was shared;
- with whom;
- when;

- why;
- the lawful and safeguarding rationale;
- any decision not to share.

26. Safeguarding records

All concerns will be recorded accurately and promptly.

Records should include:

- learner name;
- date of birth and age;
- date and time;
- location;
- people involved;
- factual description of the concern;
- learner's own words;
- immediate action taken;
- discussions;
- advice received;
- referrals;
- decisions;
- rationale;
- outcomes;
- follow-up;
- review date;
- links to related concerns.

Records will be:

- secure;
- confidential;
- access controlled;
- separate from general learner records where appropriate;
- retained in line with organisational requirements and statutory expectations;
- reviewed for patterns and themes.

Where a child transfers provider, safeguarding records will be transferred securely and promptly where appropriate.

27. Safer recruitment

SCA will apply safer recruitment principles to staff, contractors, associates and others working with learners.

Recruitment arrangements will include, as appropriate:

- safeguarding statements in advertisements;
- application forms rather than CV-only applications;
- identity checks;
- right-to-work checks;

- qualification checks;
- scrutiny of employment history;
- explanation of gaps;
- references obtained directly from referees;
- verification of references;
- appropriate DBS checks;
- barred-list checks where legally permitted and required;
- prohibition or restriction checks where relevant;
- online searches on shortlisted candidates;
- consideration of overseas checks;
- resolution of discrepancies;
- assessment of suitability to work with children;
- risk assessment where checks are incomplete;
- safeguarding induction;
- staff code of conduct;
-
- ongoing suitability monitoring.

The organisation will not assume that supervised activity is automatically outside regulated activity. Recruitment procedures will be checked against the 2026 legal position and final KCSIE 2026 requirements.

Contractors, agency staff, subcontractors and partner staff must be subject to appropriate assurance before they work with learners.

Records of recruitment checks will be maintained securely.

28. Allegations against staff and others

An allegation may meet the harm threshold where a person has:

- harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child in a way that indicates they may pose a risk;
- behaved in a way that indicates they may not be suitable to work with children.

Allegations must be reported immediately.

- Allegations about a member of staff must be reported to the DSL or senior leader.
- Allegations about the DSL must be reported to the nominated senior leader.
- Allegations about the most senior leader must be reported to the nominated governance or ownership contact.
- The LADO will be consulted without delay where the harm threshold may be met.

The organisation will consider:

- immediate risk;
- suspension or alternative duties;
- LADO advice;
- police involvement;

- children's social care;
- employer or agency involvement;
- DBS referral;
- professional-body referral;
- support for the child;
- support for the staff member;
- confidentiality;
- record keeping.

Resignation or termination of services will not prevent safeguarding action, investigation or referral.

29. Low-level concerns

A low-level concern is any concern that an adult working with learners may have acted in a way that:

- is inconsistent with the staff code of conduct;
- does not meet the harm threshold;
- causes a sense of unease or doubt;
- may indicate inappropriate conduct or poor professional boundaries.

Examples may include:

- inappropriate familiarity;
- favouritism;
- private or unauthorised communication;
- inappropriate use of social media;
- humiliating learners;
- sharing personal information;
- blurred professional boundaries;
- inappropriate comments;
- isolated policy breaches.

Low-level concerns must be reported, recorded and reviewed.

The organisation will:

- identify patterns;
- take proportionate management action;
- review organisational culture;
- consider whether concerns collectively meet the harm threshold;
- refer to the LADO where appropriate.

30. Staff conduct and professional boundaries

Staff must:

- maintain professional relationships;
- use approved communication systems;
- avoid personal social-media contact with learners;
- avoid sharing personal contact details unless formally authorised;
- avoid one-to-one arrangements that have not been appropriately planned;

- conduct remote sessions professionally;
- maintain suitable backgrounds and environments for online delivery;
- avoid favouritism;
- not engage in sexual or romantic relationships with learners;
- not exchange gifts or money outside approved arrangements;
- report boundary concerns.

Breaches may be managed under disciplinary and safeguarding procedures.

31. Whistleblowing

Staff must raise concerns about:

- unsafe practice;
- failure to follow safeguarding procedures;
- concerns being ignored;
- unsuitable conduct;
- concealment of incidents;
- retaliation against reporters;
- leadership failures.

Concerns may be raised:

- with the DSL;
- with a senior leader;
- with the governance or ownership contact;
- through external whistleblowing routes where appropriate.

No person should suffer detriment for raising a genuine safeguarding concern in good faith.

32. Learner voice and support

SCA will ensure learners:

- know how to report concerns;
- know who the DSL and deputy are;
- understand online safety;
- understand Prevent;
- know how to obtain help;
- are given opportunities to discuss welfare in reviews;
- understand acceptable behaviour;
- know that concerns will be taken seriously;
- can raise concerns about staff, employers or other learners.

Learner feedback will be used to:

- test whether learners feel safe;
- assess understanding of reporting routes;
- identify emerging concerns;
- improve safeguarding arrangements.

Additional communication support will be provided where learners have:

- SEND;
- communication difficulties;
- language needs;
- neurodiversity;
- sensory impairments;
- difficulty expressing concerns.

33. Curriculum and prevention

Safeguarding will be reinforced through:

- induction;
- progress reviews;
- personal development;
- British values;
- online safety;
- Prevent;
- equality, diversity and inclusion;
- workplace behaviour;
- healthy relationships;
- consent;
- sexual harassment awareness;
- critical thinking;
- misinformation and conspiracy awareness;
- learner rights and reporting routes.

Curriculum content will be age appropriate and relevant to apprenticeship and workplace settings.

34. External speakers and events

External speakers and events must be approved in advance.

Approval will consider:

- speaker identity;
- purpose and content;
- safeguarding risk;
- Prevent risk;
- equality and discrimination risks;
- suitability for learners;
- supervision;
- online access;
- recording arrangements.

Records of approval and risk assessment will be retained.

35. Quality assurance and monitoring

Safeguarding effectiveness will be monitored through:

- review of concern forms;
- case audits;
- referral analysis;
- response times;
- learner voice;
- staff confidence;
- training completion;
- employer feedback;
- partnership assurance;
- online safety reviews;
- safer recruitment audits;
- review of low-level concerns;
- trend analysis;
- safeguarding and Prevent risk-register reviews;
- governance scrutiny.

Findings will inform:

- the Continuous Improvement and Quality Framework;
- action plans;
- staff development;
- curriculum planning;
- employer engagement;
- policy updates;
- resource allocation.

The safeguarding and Prevent risk register will be reviewed at least quarterly and sooner where risks change. The organisation's current register records medium risks in relation to under-18 learners, employer settings, online safety and local risks.

36. Related policies and procedures

This policy should be read alongside:

- Prevent Policy;
- Online Safety Policy;
- Safeguarding and Prevent Concern Form;
- Safeguarding and Prevent Flowchart;
- Staff Code of Conduct;
- Safer Recruitment Policy;
- Whistleblowing Policy;
- Low-Level Concerns Procedure;
- Allegations Management Procedure;
- Data Protection Policy;
- Equality, Diversity and Inclusion Policy;
- Health and Safety Policy;
- Employer Agreement;

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- Partnership and Subcontracting Agreements;
 - Attendance and Engagement Procedure;
 - Learner Behaviour Policy;
 - Mental Health and Wellbeing Procedure;
 - Safeguarding and Prevent Risk Register.

37. Policy review

This policy will be reviewed:

- at least annually;
- following changes to legislation or statutory guidance;
- following a serious safeguarding incident;
- where audit identifies weaknesses;
- where learner or staff feedback indicates change is needed;
- where delivery arrangements change;
- where local or national risks change;
- following final publication of KCSIE 2026.

An immediate update will be made where a change is required to protect learners.

Appendix 1:
Immediate safeguarding response**A learner is in immediate danger**

1. Call 999.
2. Take reasonable steps to preserve safety.
3. Contact the DSL.
4. Record actions.
5. Notify relevant agencies and partners.

A learner discloses abuse

1. Listen.
2. Do not investigate.
3. Do not promise confidentiality.
4. Reassure the learner.
5. Record their own words.
6. Contact the DSL immediately.
7. Preserve evidence.

The DSL is unavailable

1. Contact the deputy.
2. Contact the nominated senior leader.
3. Make a direct referral where necessary.
4. Do not delay emergency action.

Concern about a member of staff

1. Report immediately to the appropriate senior person.
2. Do not investigate.
3. Preserve confidentiality.
4. Follow LADO advice where relevant.

Appendix 2:
Safeguarding recording standard

Every record should answer:

- What happened?
- When did it happen?
- Where did it happen?
- Who was involved?
- What did the learner say?
- What did the staff member observe?
- What immediate action was taken?
- Who was informed?
- What advice was received?
- What decision was made?
- Why was that decision made?
- Was a referral made?
- What was the outcome?
- What follow-up is required?
- When will the concern be reviewed?

Appendix 3:

Employer safeguarding expectations

Employers must confirm that they:

- provide a safe working environment;
- have a named safeguarding contact;
- know how to contact SCA's DSL;
- will report concerns immediately;
- will notify SCA of unexplained apprentice absence;
- will address bullying and harassment;
- will cooperate with safeguarding enquiries;
- understand responsibilities for apprentices under 18;
- will not delay urgent action;
- will not conduct an investigation that compromises safeguarding evidence;
- will provide risk information relevant to the apprentice;
- will support safeguarding training and review activity.

SMT APPROVAL

Date	Updates/Amendments	Signature
09/08/2023	General review & updates Brand Logo updated Ops Director details confirmed	<i>Neil Roll</i>
30/09/2024	Change of Business name from CP Training Services Ltd to Supply Chain Academy WEF 12 September 2024.	<i>Neil Roll</i>
11/09/2025	Version only update, full review scheduled for 22/10/2025	<i>Neil Roll</i>
22/10/2025	updated in line with KCSIE 2025 to strengthen our approach to safeguarding culture, online safety (including risks of radicalisation), learner voice, contextual safeguarding within workplace environments, early intervention, multi-agency working, and the management of low-level concerns relating to staff conduct.	<i>Neil Roll</i>
04/05/2026	Change of DSO	<i>Makayla Whyte</i>
23/07/2026	Full revision aligned to KCSIE 2026, including Family Help, child-on-child abuse, harmful sexual behaviour, AI-generated imagery, modern slavery, serious violence, DSL cover, safer recruitment, low-level concerns, online safety and apprenticeship workplace safeguarding	<i>Makayla Whyte</i>
02/09/2026	Update to DDSL from AL to MC	<i>Makayla Whyte</i>