



Safeguarding, Prevent and Learner & Staff Welfare Policy

Safeguarding, Prevent and Learner Welfare Policy
(Apprenticeships & Other Government funded Programmes)

Version Refocus 2025 (Includes Learner Journey Integration)

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1. Policy Statement and Commitment

e-Careers Group, encompassing e-Careers Limited (Company No. 04561709), e-Careers Education Limited (Company No. 07609544), and all subsidiaries trading under www.e-careers.com, is unified in its dedication to encourage a culture of Safeguarding and Welfare of our stakeholders. We believe that incorporating across our operations—from our internal governance and staff recruitment to the design and delivery of our diverse portfolio of online courses and apprenticeships—is fundamental to our success.

Our primary focus:

- Child Safeguarding: Protecting young people aged 16-17 from harm, neglect, and exploitation (in line with KCSIE).
- Adult Safeguarding: Protecting adults (18+) with care and support needs from abuse or neglect (in line with the Care Act 2014).
- We actively identify and mitigate risks of harm, exploitation, and radicalisation for all age groups and maintain a zero-tolerance approach to abuse, neglect, exploitation, discrimination, or radicalisation.

2. Scope and Applicability

This policy is a company-wide mandate and applies to all e-Careers activities, premises, and digital platforms specifically related to:

Apprenticeship Programmes (all levels)

Skills Bootcamps and other adult skills training funded by the ESFA

Adult Education Budget (AEB) provision

All staff, tutors, learners, and partners engaged in the delivery of these programmes (including young people aged 16-17).

3. Legal and Statutory Framework

This policy is written in alignment with the following statutory guidance, ensuring compliance for both young people (16-17) and adults (18+):

Legislation/Guidance	Detail
Ofsted EIF (FE & Skills) 2025	Requirement for a demonstrable and embedded safeguarding culture, effective governance, and robust processes for referral and support for all learners.
Keeping Children Safe in Education (KCSIE) 2024 (FE Context)	Mandatory guidance for safeguarding children and young people (under 18) in educational settings.
Care Act 2014 (Section 42)	Defines the legal duties for local authorities to protect adults with care and support needs who are experiencing, or are at risk of, abuse or neglect.
Mental Capacity Act 2005	Guidance on assessing capacity and acting in a person's best interests where they cannot make decisions for themselves (applies fully from age 16).
The Prevent Duty (2023)	Statutory guidance on preventing individuals from being drawn into terrorism.
UK GDPR and Data Protection Act 2018	Governing the secure and confidential handling of all learner records and safeguarding information.
Safeguarding Vulnerable Groups Act 2006	Governing DBS checks and both the Children's and Adult Barred Lists.

4. Safeguarding Young People (Aged 16-17)

Although this policy is primarily used for adult programmes, many Apprenticeships and government schemes include young people who are still legally children (aged 16 or 17).

4.1 Key Differences in Procedure

When a concern relates to a learner aged 16 or 17:

Referral Route: The Designated Safeguarding Lead (DSL) must make a referral to Local Authority Children's Social Care, not Adult Social Care.

Legal Priority: The legal framework for children, primarily KCSIE, takes precedence over the Care Act 2014, requiring adherence to procedures relating to parental responsibility and the child's best interests.

Welfare Checks: Staff must be aware that 16-17 year olds may be particularly vulnerable due to factors such as:

Entering the world of work for the first time.

Being in an adult environment without a full understanding of employer/training responsibilities. Risk of homelessness or sofa surfing.

4.2 Safer Recruitment and Suitability to Work with Children

As e-Careers works with both young people (under 18) and adults, all staff who have regular, unsupervised contact with learners are subject to enhanced DBS checks which must include a check against both the Adult Barred List and the Children's Barred List. The Single Central Record (SCR) must clearly evidence these checks.

5. Key Updates Aligned with Anticipated Safeguarding 2025 Protocols

The November 2025 policy revision incorporates the following enhancements to meet expected statutory standards in adult and vocational education:

Learner Vulnerability Focus: Training for all staff now includes identifying and responding to vulnerabilities specific to all ages, such as exploitation (modern slavery, debt bondage), domestic abuse, and complex mental health needs.

Digital and AI Safety Mandate: Explicit requirements for filtering, monitoring, and auditing of all company IT systems, addressing risks related to Generative AI, disinformation, radicalisation (Prevent), and online financial scams targeting learners.

Governance Transparency: The Board of Directors/Proprietors must receive monthly, anonymised reports on the volume, type, and outcomes of all safeguarding and welfare concerns, ensuring robust oversight of learner safety.

Low-Level Concerns Management: Mandatory, consistent recording and monitoring of all low-level concerns (LCCs) regarding staff behaviour, ensuring appropriate, proportionate action is taken before escalation is required.

6. Integration of Safeguarding and Prevent Across the Learner Journey

Safeguarding and Prevent are not standalone activities but are embedded into the design and delivery of all Apprenticeship and Bootcamp programmes. The responsibility for learner welfare is documented and tracked throughout the learner lifecycle. All evidence of safeguarding engagement and support is centrally recorded in BUD (where applicable) and the learner's digital folder, generated via Salesforce portals.

Stage of Journey	Safeguarding/Prevent Activity	Documentation Location
Application & Onboarding	Mandatory safeguarding questions on application forms to identify immediate risks (e.g., criminal convictions, past disclosures) and vulnerable adults for early support. Initial information on the role of the DSL is provided.	Salesforce Application Record
Induction	Dedicated session covering the Policy Statement, roles of the DSLs, recognition of key risks (online safety, Prevent), and how to report concerns using the internal ticketing system.	Induction Sign-off Record in BUD
First Visit & Individual Plans (IPL/ILP)	Discussion on welfare, mental health, and personal goals. The tutor/coach assesses the learner's understanding of the Safeguarding Policy and records any pre-existing needs or support requirements.	IPL/ILP Document in Learner Folder
Progress Reviews	Formal, regular welfare check-ins during every progress review. Discussion includes digital safety, workplace wellbeing, and promotion of Fundamental British Values (Prevent). Concerns are immediately escalated.	Progress Review Record in BUD
Coaching and Training Sessions	Trainers and Coaches practice 'professional curiosity.' Content is contextualised to the learner's job role and environment, covering risks like modern slavery, exploitation, and financial abuse.	Training/Coaching Session Notes in Learner Folder
End Point Assessment (EPA)	EPA preparation ensures the learner is safe and knows the welfare contacts before attending their final assessment event, particularly for external EPAs where employer support may be limited.	EPA Readiness Checklists

7. Roles and Responsibilities

Role	Key Responsibilities and Accountabilities
Board of Directors/Proprietors	Ultimate accountability for a demonstrable and effective Safeguarding culture for all ages. Ensures adequate resources are allocated and monitors safeguarding performance via monthly reports.
Designated Safeguarding Lead (DSL) – as listed.	Operational lead and expert point of contact. Managing all safeguarding referrals, liaison with Local Authority Children's

	Social Care (for under 18s), Local Authority Adult Social Care (for 18+ S.42), LADO (for allegations against staff), and ensuring robust internal reporting.
Deputy DSLs (Operations Director & CEO)	Assumes the DSL role in their absence, ensuring continuous, trained cover during all operational hours.
All Staff (Tutors, Trainers, Support Staff)	The mandatory responsibility for identifying concerns (however minor), documenting them accurately in the internal system, and escalating immediately to the DSL. Must follow the guidance on never promising confidentiality.
HR / Recruitment Team	Ensuring safer recruitment compliance, including enhanced DBS checks against both Children's and Adult Barred Lists, and monitoring the Single Central Record (SCR).
Learner Progress Coaches/Mentors	Actively monitoring learner well-being, identifying early signs of vulnerability, and using professional curiosity to escalate concerns to the DSL promptly.

8. Safeguarding Procedure (The 4-Stage Process)

All staff must follow this procedure immediately upon identifying or receiving a safeguarding concern, disclosure, or allegation concerning an adult learner.

STAGE 1: Immediate Response and Triage (Action by Staff Member)

Prioritise Safety: If an adult learner is in immediate danger (life-threatening) or requires urgent medical attention, dial 999 immediately.

Stay Calm & Listen: Allow the individual to speak without interruption. Do not interrogate or investigate. Use open, non-leading questions (e.g., "What help do you feel you need right now?").

Do Not Promise Confidentiality: Explain gently and clearly that you must share the information with the DSL to ensure they get the right help and support (e.g., referral to Adult Social Care).

Record Immediately: As soon as possible, record the facts using the company's internal reporting system (e.g., CPOMS or MyConcern). Use the individual's exact words, date, time, and location.

STAGE 2: Escalation and Documentation (Action by Staff Member)

Immediate Referral to DSL: Verbally inform the Designated Safeguarding Lead (DSL), or a Deputy DSL, within one hour of receiving the concern.

Submit Written Report: Complete the full internal Incident Report Form and ensure it is uploaded to the secure safeguarding record-keeping system.

Record Staff Concerns (LCCs): If the concern relates to a colleague's behaviour, however minor (a low-level concern), this must be reported confidentially and immediately to the DSL or CEO for management under the Staff Code of Conduct.

STAGE 3: DSL Triage and Referral (Action by DSL/Deputy DSL)

The DSL will review the recorded information and decide on the appropriate course of action, which may include:

Triage Action	Criteria for Action
Adult Social	If the individual has care and support needs (whether or not they are being met) and is experiencing or is at risk of abuse or neglect (S.42 Care Act 2014 criteria).

Care Referral	
LADO Referral	<p>If the concern or allegation relates to a member of staff (including contractors) or an adult working for the company (even if the learner is an adult).</p> <p>LADO stands for the Local Authority Designated Officer, a person who manages allegations of harm or potential harm against individuals who work with children (16-17). The LADO, based in each local authority, receives reports, provides guidance, and oversees investigations into such allegations to ensure they are handled fairly and thoroughly, aiming for quick resolution and improved child protection measures.</p> <p>Berkshire has multiple local authorities, and each has its own LADO service. To find the correct LADO for your area, you need to know which local authority district you are in:</p> <ul style="list-style-type: none"> • Slough: Contact the LADO at LADO@sloughchildrenfirst.co.uk or on 07927 681858 / 01753 690906. • West Berkshire: Contact the LADO at LADO@westberks.gov.uk. • Royal Borough of Windsor and Maidenhead: The LADO service is managed by Achieving for Children, and they can be contacted at LADO@achievingforchildren.org.uk or on 07774 332675. • Bracknell Forest: Contact LADO@bracknell-forest.gov.uk or call 01344 351572. • Wokingham: Contact the LADO at LADO@wokingham.gov.uk. <p>Other Relevant LADO networks will be contacted depending on where our learners are based.</p>
Welfare Support	<p>If the concern relates to mental health, housing, financial distress, or domestic abuse, leading to a referral to an external partner agency such as their local citizen's advice in their area.</p>
Prevent Referral	<p>If there is a risk of the adult being drawn into radicalisation or extremism. DSL to Contact: https://www.gov.uk/guidance/get-help-if-youre-worried-about-someone-being-radicalised for guidance.</p>

STAGE 4: Monitoring and Review

The DSL must ensure all referrals are logged and actioned promptly, with clear evidence of multi-agency communication (e.g., with Adult Social Care, or local welfare agencies).

All open cases will be reviewed weekly by the DSL to monitor progress.

The DSL will ensure staff and learners are provided with appropriate feedback (where possible and safe to do so) on actions taken, maintaining confidentiality throughout.

9. Confidentiality and Record Keeping

All safeguarding records are sensitive and must be held in accordance with UK GDPR.

Records will be stored electronically in a secure, encrypted system and accessed only by the DSL team on a strictly need-to-know basis.

10. Whistleblowing Policy

e-Careers encourages a culture of openness. If any member of staff, contractor, or partner believes that safeguarding procedures are not being followed, or that an adult working for the company poses a risk to learners, they must report this confidentially to:

The Chief Executive Officer (CEO), or

Ofsted Whistleblowing Hotline: 0300 123 3155 (if internal routes are inappropriate or ineffective).

No individual who raises a concern in good faith will be penalised, even if the concern is later found to be unsubstantiated.

11. DSL Contact Information

For any safeguarding concerns, disclosures, or requests for advice:

Role	Name	Phone Number	Email
Designated Safeguarding Lead (DSL)	Neil Gosal	020 3198 7556	safeguarding@e-careers.com neil.g@e-careers.com or safeguarding@e-careers.com
Deputy DSL (Contingency)	Chief Executive Officer (CEO)	Via main switchboard	Via our website e-careers.com Weblink: https://safeguarding.e-careers.com/

In an emergency always call 911.

12. Policy knowledge check

Mandatory for staff delivering on Government Funded programmes.

Complete the quiz click here [The Quiz](#)

13. Document Control

DOCUMENT NAME	VERSION	MASTER COPY LOCATION
Safeguarding, Prevent and Learner & Staff Welfare Policy_refocus	Refocus_V1	SharePoint Website

Unless stated in this document's body, the owner is responsible for maintaining document control and facilitating compliance, as well as managing review, updates, and changes.

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Revision History

Version	Date	Amended By	Summary of changes
Refocus	September 2025	MR	Refocus and aligned to new 2025 due to changes to OFSTED rules and EC Strategy for Growth.

Document Reviews

This document has been reviewed for QC purposes by the following, in addition to those on the 'approvers' list.

Approvals

This document requires the following approvals for implementation and / or for any change in content.

Version	Date	Name	Title / Role	Approval Status (Approval Signature)
Refocus	8 Oct 2025	Jazz Gandhum	Founder and Board member	Email dated: 8/10/2025 to MR

Linked Policies: Mental Health, Teaching Learning and Assessment and Quality Policy.