

Safeguarding and Prevent Duty Policy

CSA (Services) Limited

Version No:	12
Date:	26.10.25
Next Review Date:	26.10.26

Purpose

This policy sets out CSA (Services) Limited's approach to assuring the safety and wellbeing of learners so that they can achieve and progress in their careers and everyday lives. We are especially committed to promoting open debate and free expression, while recognising the need to challenge prejudice, eliminate discrimination and prevent radicalisation. We aim to develop our learners to be effective citizens in a democratic society.

Scope

The scope of this policy covers CSA staff, tutors, employers and learners who are involved in the apprenticeship programme. Apprentices are geographically dispersed across England and all have employed status from the start of their programmes. This policy complements and works in

conjunction with those of employers. Generally, our apprentices are aged 18 or over. However, we envisage that apprentices under the age of 18 may be recruited and this policy is designed to be applicable to all.

Definitions

We use the definitions of the term ‘safeguarding’ given in the statutory guidance.

Safeguarding children is defined in “Working together to safeguard children” as

- protecting children from maltreatment
- preventing impairment of children’s health or development
- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes.

Safeguarding vulnerable adults is defined in the Care and support statutory guidance, issued under the Care Act 2014 as

- protecting the rights of adults to live in safety, free from abuse and neglect
- people and organisations working together to prevent and stop both the risks and experience of abuse or neglect
- people and organisations making sure that the adult’s wellbeing is promoted including, where appropriate, taking fully into account their views, wishes, feelings and beliefs in decision on any action
- recognising that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances and therefore potential risks to their safety or wellbeing.

We recognise the types of abuse set out in “Keeping children safe in education” (September 2025) including online, physical abuse, emotional abuse, sexual exploitation, peer-on-peer abuse, Female Genital Mutilation (FGM) and so-called ‘honour-based’ violence.

In accordance with the Safeguarding Vulnerable Groups Act 2006 we recognise:

- A child is a person who is under 18 years of age ([section 60\(1\), SVGA 2006](#)).
- A vulnerable adult is a person who is:
 - 18 years old or over; and
 - the subject of regulated activity as defined by paragraph 7(1) of [Schedule 4](#) to the SVGA 2006.

We comply with the Prevent Duty (The Counter-Terrorism and Security Act June 2015) and the associated guidance for further education institutions in England and Wales. Staff exemplify the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs, in their working practice and promote these values to apprentices.

Responsibilities

All staff have a responsibility to follow the guidance laid out in this policy and related documents, and to respond to any concerns using the specified procedures. We expect all staff to promote good practice by being excellent role models, contribute to discussions about safeguarding and the Prevent Duty positively and to be actively involved in promoting best practice. Staff responsibilities for Safeguarding and Prevent are explicitly defined in their job descriptions.

CSA (Services) Ltd Board ensures that

- an appropriate Safeguarding and Prevent Duty policy is in place
- sufficient resources including time, funding, training supervision and support, are allocated to ensure that the policy can be implemented effectively
- the policy is subject to annual monitoring and review
- one board member has particular responsibility for overseeing Safeguarding and Prevent Duty issues demonstrating a clear line of accountability at the most senior level.

The Senior Management Team has responsibility for:

- implementing the Safeguarding and Prevent Policy
- monitoring, reviewing and updating the Safeguarding and Prevent Policy

- monitoring the work of and supporting the Designated Safeguarding Lead.

The Designated Safeguarding Lead is responsible for the day-to-day implementation of this policy, which includes:

- promoting good practice in relation to Safeguarding and Prevent
- ensuring that all staff have access to appropriate training and updates.
- receiving staff concerns about safeguarding and responding in accordance with company procedures
- developing and maintaining effective links with relevant external agencies, including the sharing of information.

The Designated Safeguarding Lead for CSA (Services) Ltd is: Harvey Watson, Learning & Development Director. Any concerns should be reported to him at safeguarding@csa-uk.com.

The Designated Safeguarding Support, should Harvey Watson be unavailable, is: Zoe Dellow, L&D Operations Manager or Katie Troy Learning & Development Consultant.

The Board Director responsible for Safeguarding for CSA (Services) Ltd is: Chris Leslie, Chief Executive. The Designated Lead and Deputy receive communications sent to safeguarding@csa-uk.com

Implementation

The scope of this policy is wide-ranging and supported by a range of related policies and procedures.

These include:

- whistleblowing policy
- grievance and disciplinary procedures
- health and safety, including lone working procedures
- equal opportunities
- data protection and information security
- good repute policy
- the Prevent risk assessment and action plan
- Social Media Policy

- Staying Safe Online Policy
- apprentice handbook
- employer handbook
- safeguarding practitioner guide
- Tutor code of conduct
- staff recruitment – see more information below.

Recruitment of staff

Safe recruitment practices are followed as follows

- job or role descriptions for all roles involving contact with young people and/or vulnerable adults contain reference to their safeguarding responsibilities
- there are person specifications for roles, which contain a statement on core competency with regard to young person/ vulnerable adult protection/ safeguarding
- shortlisting is based on formal application processes/forms, including the submission of CVs.
- Interviews are conducted according to equality of opportunity principles and interview questions are based on the relevant job description and person specification
- DBS checks are conducted for specific roles for all staff working with young people and vulnerable adults.
- no formal job offers are made until after checks for suitability are completed (including DBS checks, two references, verification of identify and checking of qualifications). However, in exceptional and justifiable circumstances employment could begin prior to DBS clearance. In such cases, an appropriate risk assessment would be undertaken.

Disclosure and Barring Service checks

CSA (Services) Ltd maintains a central list of staff, with dates of when their DBS checks were made and certificate numbers. DBS re-checks are carried out every three years. Existing staff who transfer from a role which does not require a DBS check to one which involves contact with apprentices will come into scope for DBS checks. All staff who are involved in direct or remote contact with apprentices will be subject to basic DBS checks. Generally, we do not usually recruit learners who are

under the age of 18. We do not believe that we meet the criteria to apply for enhanced DBS for all staff and tutors as we do not usually meet the frequency of contact to qualify as undertaking regulated activity.

Arrangements for Apprentices under the Age of 18

Our policy, should we recruit learners under the age of 18, is that all staff who will be providing training or information, advice and guidance will be subject to the normal DBS checks.

We are only legally permitted to do enhanced checks if we are carrying out regulated activity. For the CSA, teaching only becomes regulated activity if we meet the following threshold: I can confirm we do not meet the required threshold.

Additional learning content will be provided to Under 18's on an individual basis to raise awareness of sexual harassment issues, including what constitutes sexual violence and sexual harassment, how to report a concern of this nature and important context to be aware of, including; what is consent.

The organisation encourages open and transparent dialogue in relation to behaviour. In the event that an allegation is received against an adult working for the organisation by or in relation to an

Activity	Period condition	Supervision	Age of child
Teaching, training, or instruction, care for, or supervision of children	On more than 3 days in a 30-day period, or once overnight between 2am and 6am with the opportunity for face-to-face contact with children	Department for Education statutory guidance must be considered	Under 18 – but not if the activity is in relation to the child's paid or unpaid employment and they are 16 or 17 years old

under 18 learner, we will follow the appropriate complaint procedure and guidance. Should this allegation not meet the required harm threshold, we may record this allegation as a 'low level' concern. A 'low level' concern is likely to be an allegation of behaviour or conduct that is in conflict with our standards as defined in the **Tutor Code of Conduct**. Any concerns or allegations may be

reported to any tutor or via safeguarding@csa-uk.com, and will be referred to the designated safeguarding lead.

Working with partners and subcontractors

Where CSA (Services) Ltd undertakes sub contract work with other partners to provide services, or occasional sessional staff, the following arrangements will be maintained

- there is regular checking of safeguarding arrangements in partner organisations
- safeguarding is a fixed agenda item on any partnership reporting meetings
- service level agreements include clear minimum expectations, arrangements for reporting safeguarding and Prevent issues, and non-compliance procedures.

Support for staff

Induction for new staff

CSA (Services) Ltd provides an induction for all new staff, which includes a comprehensive coverage of safeguarding and Prevent issues. This includes an introduction to the Safeguarding and Prevent Duty policy and related procedures, roles and responsibilities, and how to identify and report safeguarding and Prevent Duty issues. This also applies to CSA (Services) Ltd Board members

On-going training

All staff who are in contact with apprentices undertake safeguarding and Prevent Duty training at an appropriate level. In particular, teaching staff will be equipped fully with the knowledge and confidence to discuss these topics with apprentices. An appropriate level training qualification will be refreshed at least every 2 years for everyone, however, knowledge and skills will be refreshed at regular intervals, at least annually.

Regular updates

Safeguarding and Prevent is a regular agenda item at team meetings, senior management meetings, board meetings and one-to-ones. The Designated Safeguarding Lead will update colleagues with new information as it becomes available.

Staff code of conduct

CSA (Services) Ltd expects all staff to protect the professional integrity of both themselves and the company. The following company policies also contain guidance on staff conduct:

- the CSA Good Repute Policy and Risk Assessment Guide
- the CSA Staff Handbook
- Gifts, Bribery and Entertainment Policy.

Reporting safeguarding and Prevent Duty concerns

The process outlined in the company's Safeguarding Practitioner Guide details the stages involved in raising and reporting concerns at CSA (Services) Ltd.

In summary, where a learner makes a disclosure independently this will be raised using the safeguarding@csa-uk.com email address.

If an apprentice raises an issue during any teaching or interaction that a staff member considers is a safeguarding concern, the staff member/coach/tutor should complete the safeguarding reporting tool, CPOMS as a matter of urgency. They, following consultation with senior managers, will then decide on an appropriate course of action. This may involve referral to external agencies such as the emergency services, social service or the Channel programme. The Designated Safeguarding Lead maintains a central log (On CPOMS) of concerns raised and action taken.

Managing Information

Information is managed securely and confidentially recorded in accordance with the company's Data and Information Security Policy. All staff are made aware that the company has a professional duty to share information with other agencies in order to safeguard young people and/or vulnerable adults. However, information is shared on a need-to-know basis only, and any decisions on sharing information are made by the Designated Safeguarding Lead.

Welfare and Pastoral Support

All apprentices have a named tutor who provides first line support with any learning-related or personal difficulties. In most instances, these can be resolved through liaison with the apprentice and his/her workplace manager. In some instances, the Director of Learning and Development may provide additional support and guidance to the apprentices and tutor. Where welfare or personal concerns develop into Safeguarding or Prevent Duty Concerns, the usual reporting procedure should be followed and the matter raised with the Designated Safeguarding Lead.

Online Safety

The company's Social Media policy includes reference to the Prevent Duty. During their induction, staff and apprentices receive guidance on how to keep themselves safe when using the internet, as part of the digital safety strategy (See also **Staying Safe Online Policy – Annex 1**). Staff further develop and check their understanding and application of online safety as an integral part of the learning programmes. Apprentices do not have access to the internet via our equipment or connections; during workshops, apprentices use their own laptops and mobile telephones.

Employers

Employers of apprentices are required to comply with the company's Safeguarding and Prevent Duty Policy and related procedures, as stated within employer agreements. This policy serves to make employers aware and acknowledge that CSA (Services) Ltd has a statutory duty to safeguard and promote the welfare of individuals under the age of 18 years old and vulnerable adults over the age of eighteen (18) years old pursuant to the Children Act 2004 and the Safeguarding Vulnerable Groups Act 2006.

All employers of apprentices have an obligation to ensure that their employees, contractors and agents comply with the requirements of the Children Act 2004 and the Safeguarding Vulnerable Groups Act 2006 to the extent that they apply to the employer; and to confidentially report to the Designated Safeguarding Lead, any concerns relating to an Apprentice or other learner enrolled with CSA (Services) Ltd, or an employee, agent or contractor of CSA (Services) Ltd.