

HR.P37

Safeguarding & Prevent Policy and Procedure

v26.1

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Policy/Document Relates to	End-Point Assessment Provision, Awarding Provision, Endorsed Provision, Corporate
Policy/Document is for the use of	All TQUK employees, workers, associates, contractors and volunteers, including those working within the Construction department, together with visitors, recognised centres and relevant delivery partners
Should be read in conjunction with	Safeguarding Code of Conduct; Data Protection; Whistleblowing; Safer Recruitment; Health and Safety; Equality, Diversity and Inclusion; Sexual Harassment; Malpractice and Maladministration; Assessment Recording and Retention requirements

Immediate action: If a child or adult is in immediate danger, call 999. Then report the concern through the TQUK Safeguarding Report Form without delay. Do not wait for permission and do not investigate.

Primary reporting route: [TQUK Safeguarding Report Form](#)

Safeguarding resources and restricted case area: [TQUK Safeguarding Hub](#)

Contents

Contents.....	3
1. Policy statement and principles	4
2. Purpose, scope and definitions	4
2.1 Purpose	4
2.2 Scope	4
2.3 Definitions	4
3. Governance and responsibilities.....	5
4. Prevention: safer recruitment, training and risk assessment	5
4.1 Safer recruitment and suitability.....	5
4.2 Induction, training and assurance	6
4.3 Risk assessment and centre readiness	6
5. Recognising safeguarding and Prevent concerns.....	6
5.1 Prevent	7
6. Reporting and responding.....	7
6.1 The required route	7
6.2 Responding to a disclosure - the five Rs	7
6.3 Triage and action.....	8
7. Operational procedures by setting.....	8
7.1 Construction department and other TQUK-controlled assessment centres	8
7.2 Visiting provider, employer, school, college or other premises	8
7.3 Remote assessment or online contact	9
7.3.1 Interim transitional arrangements for Construction assessment activity.	9
7.4 Scripts, portfolios, projects, recordings and customer contact.....	9
7.5 Malpractice investigations involving a child or adult at risk.....	10
8. Allegations and low-level concerns about adults working with children	10
9. Information sharing, records and retention.....	10
9.1 Current minimum retention position.....	10
10. Quality assurance, monitoring and review.....	11
Appendix 1 - Immediate response card	11
Appendix 2 - Safeguarding categories and indicators	11
Appendix 3 - Key contacts	12
Appendix 4 - Statutory framework and guidance	12

1. Policy statement and principles

TQUK is committed to protecting children, young people and adults at risk from abuse, neglect, exploitation, radicalisation and other harm. Safeguarding is everyone's responsibility. The welfare and best interests of the person at risk are central to every decision, and concerns must be acted on without delay.

This policy establishes one TQUK-led safeguarding model. The TQUK Safeguarding Team, Safeguarding Report Form and Safeguarding Hub are the primary governance, reporting and record-keeping arrangements. The Construction department's onsite safeguarding expertise and centre controls operate within that model and do not replace or bypass it.

- Empowerment - support informed choice and consent wherever this is consistent with safety.
- Prevention - act before harm occurs and address low-level concerns early.
- Proportionality - use the least intrusive response appropriate to the risk.
- Protection - support and represent those in greatest need.
- Partnership - work with centres, providers, employers, families and statutory agencies where appropriate.
- Accountability - maintain clear decisions, records, ownership and oversight.
- Equality and inclusion - recognise how disability, language, identity, culture, discrimination and unequal power may affect risk, disclosure and access to support.

TQUK also recognises its responsibility to protect employees and third-party colleagues from avoidable risk and unfounded allegations through clear boundaries, safer working arrangements and fair processes.

2. Purpose, scope and definitions

2.1 Purpose

This policy explains how TQUK prevents, recognises, reports, triages, records and responds to safeguarding and Prevent concerns arising through qualification, apprenticeship assessment, external quality assurance, customer contact and activity at TQUK-controlled assessment locations, including those operated by the Construction department.

2.2 Scope

It applies whenever a person works for, represents, visits or delivers activity on behalf of TQUK, including within the Construction department, whether paid or unpaid, face to face or remotely. It covers concerns arising at TQUK premises and assessment centres, recognised centres, provider or employer premises, schools, colleges, online environments, assessment recordings, scripts, portfolios, projects, social media, customer communications and offsite activity.

2.3 Definitions

Term	Meaning
Child	Anyone under the age of 18.
Adult at risk	A person aged 18 or over who has needs for care and support, is experiencing or at risk of abuse or neglect and, because of those needs, is unable to protect themselves from that abuse, neglect or its risk.
Learner	A learner, apprentice or assessment candidate, including a person under 18.

Third-party colleague	An assessor, verifier, marker, contractor, agency worker, consultant, volunteer, work-placement student or other person acting for TQUK who is not a TQUK employee.
Safeguarding concern	Any information, behaviour, incident, disclosure or pattern suggesting that a person may be at risk of abuse, neglect, exploitation, radicalisation or other harm.
Low-level concern	A concern about conduct by an adult working with children that may be inconsistent with the Code of Conduct, even where it does not appear to meet the harm threshold.
Construction department	The TQUK department responsible for construction-related apprenticeship assessment, including any assessment centre or premises it operates or hosts.

3. Governance and responsibilities

Role	Key responsibilities
Leadership Team	Approves the policy; assures resources and accountability; receives proportionate trend, risk and compliance reporting.
TQUK Designated Safeguarding Lead (DSL)	Owns the safeguarding framework; triages cases; makes or authorises external referrals; maintains oversight of allegations, Prevent concerns and restricted records; provides advice and escalates material risk.
Deputy DSLs / Safeguarding Team	Provide cover, triage and case support under delegated authority; maintain consistent case recording and follow-through.
HR	Leads employment processes and works with the DSL on allegations, low-level concerns, safer recruitment, DBS checks and referrals where relevant.
Construction department Safeguarding Contact	Acts as the nominated onsite safeguarding contact for Construction department activity; maintains local readiness and immediate safety controls; reports every safeguarding concern through the TQUK portal and works under the direction of the TQUK DSL.
Managers and centre leads	Ensure staff, associates and visitors understand local arrangements; complete risk controls; support reporting; preserve evidence; never investigate safeguarding concerns independently.
All employees and third-party colleagues	Maintain professional boundaries; recognise and report concerns; respond appropriately to disclosures; complete required training; cooperate with authorised action.
Recognised centres, providers and employers	Maintain their own applicable safeguarding duties and local DSL arrangements; provide a safe assessment environment; cooperate with TQUK; notify TQUK of concerns affecting its learners, assessments or representatives.
Operational hierarchy: The local centre contact may take immediate action to make a person or location safe. The safeguarding concern must still be submitted through the TQUK portal. The TQUK DSL retains case oversight and decides, with relevant specialists, the onward safeguarding response.	

4. Prevention: safer recruitment, training and risk assessment

4.1 Safer recruitment and suitability

- Apply role-appropriate pre-employment or engagement checks, identity and right-to-work checks, references and DBS checks where eligible and required.
- Define whether the role involves regulated activity and the level of supervision required.

- Do not permit a person to undertake unsupervised activity with children or adults at risk unless authorised controls and checks are complete.
- Record and periodically review suitability, role changes and safeguarding restrictions.
- Consider the legal duty to refer to the DBS where the statutory conditions are met, even if the person has resigned or otherwise left.

4.2 Induction, training and assurance

- Safeguarding, Prevent, online safety, reporting and professional-boundary training during induction and refreshed at least annually or when risk changes.
- Role-specific training for DSLs, deputies, centre leads, assessors, remote assessors, markers and staff working with under-18s.
- Confirmation that employees and relevant associates have read this policy and the separate Code of Conduct.
- Periodic scenarios, briefings, referral-quality feedback and lessons learned from incidents and near misses.
- Training completion and overdue actions monitored by the policy owner and reported through governance arrangements.

4.3 Risk assessment and centre readiness

Safeguarding must be considered within activity, site, lone-working, event and assessment risk assessments. Before the Construction department hosts assessment involving children or adults at risk, the responsible manager must confirm:

- a named onsite safeguarding contact and escalation cover;
- visitor sign-in, identification, access control and supervision arrangements;
- suitable rooms that protect privacy while maintaining appropriate visibility and access to assistance;
- a responsible adult or chaperone arrangement where required;
- arrival, handover, breaks, welfare, emergency, first-aid, evacuation and safe departure arrangements;
- controlled-environment, recording and technology arrangements for the assessment method;
- reasonable adjustments, communication or accessibility needs that could affect safety;
- how the TQUK portal will be accessed and how evidence will be preserved securely; and
- contingency action if the planned controls are not in place, including stopping or rescheduling activity.

5. Recognising safeguarding and Prevent concerns

Concern may arise from a disclosure, observation, behaviour, injury, written or recorded evidence, online activity, third-party information or a pattern of low-level events. Indicators are not proof. Staff must remain professionally curious, avoid assumptions and report what they know.

- Physical, sexual or emotional abuse and neglect.
- Domestic abuse, including a child seeing, hearing or experiencing its effects.
- Child-on-child abuse, harmful sexual behaviour, sexual harassment and sexual violence.
- Child sexual or criminal exploitation, trafficking, county lines, gangs and serious youth violence.
- Online abuse, cyberbullying, grooming, coercion, harmful content, and making or sharing nude or semi-nude images, including AI-generated images.
- Bullying, hate incidents, racism and other prejudice-based or discriminatory harm.
- Financial or material abuse, organisational abuse, self-neglect and modern slavery.

- Forced marriage, honour- or faith-based abuse, female genital mutilation and other harmful practices.
- Mental-health crisis, suicide risk, self-harm, substance misuse, homelessness or other circumstances increasing vulnerability.
- Radicalisation, extremist influence or susceptibility to being drawn into terrorism.
- Unsafe adult conduct, boundary breaches, grooming behaviour, low-level concerns or allegations against a person in a position of trust.

5.1 Prevent

Prevent concerns are safeguarding concerns. Staff must report indicators through the TQUK Safeguarding Report Form and must not attempt to assess ideology, investigate or make a Channel referral independently. The DSL will assess the information, seek advice from the relevant Prevent contact and make or authorise a referral where appropriate.

6. Reporting and responding

6.1 The required route

Report without delay: Use the TQUK Safeguarding Report Form for every safeguarding or Prevent concern connected with TQUK activity, including activity within the Construction department. If the portal is temporarily unavailable, contact the TQUK Safeguarding Team or DSL by the approved internal route and complete the form as soon as access is restored.

Report here: [TQUK Safeguarding Report Form](#)

1. Make the person and immediate environment safe. Call 999 if there is immediate danger or urgent medical need.
2. Listen and respond calmly. Do not promise confidentiality, investigate, confront anyone or ask leading questions.
3. Make a factual record as soon as possible, using the person's own words where relevant. Record date, time, location, people present, what was seen or heard and immediate action taken.
4. Submit the concern through the TQUK Safeguarding Report Form before the end of the working day and immediately where risk is urgent.
5. Preserve relevant evidence securely in the restricted Safeguarding Hub or as directed by the Safeguarding Team. Do not download, copy or circulate more material than necessary.
6. Continue to cooperate with the DSL. Do not update the person who is the subject of an allegation or conduct your own enquiries.

6.2 Responding to a disclosure - the five Rs

Stage	Required response
Recognise	Treat disclosures, behavioural changes and personal concerns seriously.
Respond	Remain calm; listen; reassure the person they did the right thing; explain that you must share the concern with people who can help; do not make promises or ask leading questions.
Report	Use the TQUK portal without delay and before the end of the working day; use emergency services first where danger is immediate.
Record	Use exact words where possible; separate fact from opinion; include dates, times, location, witnesses and immediate actions; sign and date any contemporaneous note.

Refer	The DSL or authorised deputy decides on external referral. Other staff must not investigate or decide whether abuse has occurred.
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6.3 Triage and action

The TQUK Safeguarding Team will acknowledge and triage the concern as soon as practicable, normally within 24 hours. Urgent cases are acted on immediately. Depending on the concern, the DSL may:

- seek further factual information from the reporter without asking them to investigate;
- liaise with the local centre, provider or employer DSL while retaining TQUK oversight;
- refer or seek advice from children's social care, adult social care, the LADO, police, Prevent/Channel or another appropriate agency;
- coordinate with HR, Compliance, Data Protection, Health and Safety, Malpractice or another internal function;
- pause, void, reschedule or adapt assessment activity where this is necessary to protect a person or the integrity of the assessment;
- record the rationale, actions, owners, review dates and closure decision in the restricted Safeguarding Hub.

The reporter may not receive detailed feedback because information is shared only on a need-to-know basis. The Safeguarding Team may confirm that the concern has been received and may provide general learning or referral-quality feedback.

7. Operational procedures by setting

7.1 Construction department and other TQUK-controlled assessment centres

- Display or make available the names and contact arrangements for the local safeguarding contact and the TQUK reporting route.
- Require visitors and external assessors to sign in, verify identity, wear identification where used and follow restricted-area controls.
- Do not allow unauthorised or unsupervised access to children, young people or adults at risk.
- Ensure assessment rooms are appropriate, hazards are controlled and a responsible person can be contacted immediately.
- Avoid planned one-to-one situations that cannot be seen, heard or supported by another responsible adult. Do not lock a room containing a learner and assessor.
- Use only approved business systems for communication, recordings and evidence. Personal contact details and social-media accounts must never be used.
- Report welfare, conduct, violence, weapon, substance, missing-person, sexual-harm or other safeguarding incidents through both the immediate site safety process and the TQUK portal.
- Where safety controls fail, stop the activity, move people to safety and reschedule or relocate the assessment as necessary.

7.2 Visiting provider, employer, school, college or other premises

- Confirm the host's local DSL or safeguarding contact and emergency arrangements on arrival.
- Follow the host's safeguarding and visitor arrangements in addition to this policy.
- Do not remain in an unsafe or unauthorised one-to-one situation. Seek a responsible adult, move to a suitable space or stop and reschedule the activity.
- Tell the host DSL about a concern where safe and appropriate, ask what immediate action they will take and record the response.
- Submit the concern through the TQUK portal even where the host has also recorded it. Escalate to the TQUK DSL if the host response is absent or inadequate.

7.3 Remote assessment or online contact

- Use an approved platform and organisational account; never personal messaging, email or social media.
- Complete the required identity and controlled-environment checks and explain recording arrangements before assessment starts.
- Record remote assessment where required by the assessment plan and TQUK procedure, with appropriate notice and secure storage.
- For a learner under 18, confirm the provider/employer's safeguarding arrangements and the availability of a responsible adult before starting where required by the risk assessment.
- Maintain professional boundaries and do not continue a personal or therapeutic conversation outside the assessment remit.
- If a safeguarding concern or unsafe interruption occurs, pause the assessment, make the learner as safe as reasonably possible, contact emergency support if required, preserve the recording and follow the incident and safeguarding reporting processes.
- Assessment outcome action, including whether to void or reschedule, must be determined through the relevant assessment procedure; safeguarding action must not be delayed by that decision.
- Any temporary departure from these requirements must comply with the controlled transitional arrangements set out in section 7.3.1.

7.3.1 Interim transitional arrangements for Construction assessment activity.

To be reviewed 6 monthly during the transitional period.

- During the transition to fully approved TQUK platforms and organisational accounts, it is recognised that some freelance assessors undertaking Construction assessment activity may not yet have access to all required systems or may encounter technical limitations when recording or uploading assessment evidence. Where this applies, an alternative platform or recording method may only be used on an exceptional and temporary basis, with prior approval from the relevant Delivery Manager or other designated person. Before approval is given, consideration must be given to safeguarding, confidentiality, data protection, information security and whether the account or platform can be accessed or administered by another employer or third party. Accounts controlled by another employer must not be used where that employer could access TQUK assessment information or recordings.
- Where the temporary use of a personal recording device is authorised because of system or file-size limitations, the assessor must ensure that the device is appropriately secured; automatic cloud backup and synchronisation are disabled; participants are informed that the assessment is being recorded in accordance with the applicable privacy information; and the recording is transferred to the approved TQUK system as soon as reasonably practicable. Once successful transfer has been confirmed, all copies held on the device or within any temporary storage location must be securely and permanently deleted. Recordings must not be retained, shared or used for any other purpose. Any loss, unauthorised access, misdirection or suspected compromise must be reported immediately in accordance with TQUK's data-breach and safeguarding-reporting procedures.
- These transitional arrangements will remain under review and will cease for individual assessors once access to the required TQUK systems and approved recording arrangements has been provided.

7.4 Scripts, portfolios, projects, recordings and customer contact

- Pause routine handling and identify the exact question, page, timestamp or communication containing the concern.
- Use the relevant departmental incident process where assessment integrity or malpractice may also be involved.

- Submit the concern through the TQUK portal with a concise factual explanation.
- Place only the necessary evidence in the restricted Safeguarding Hub or follow the Safeguarding Team's instructions. Do not circulate the complete record where an extract is sufficient.
- Continue marking, assessment or customer contact only when safe and when directed by the appropriate operational and safeguarding leads.

7.5 Malpractice investigations involving a child or adult at risk

Any interview or fact-finding activity must be planned with the DSL and the host organisation. TQUK representatives must follow the host's accompanied-interview requirements. A child or adult at risk must not be interviewed alone by a TQUK employee or associate. Safeguarding and malpractice processes may run alongside one another, but safeguarding takes priority where there is a risk of harm.

8. Allegations and low-level concerns about adults working with children

Do not investigate: Report concerns immediately through the TQUK portal and to HR or the appropriate senior manager. Do not question the subject, contact witnesses, promise an outcome or attempt to resolve the matter informally.

The DSL and HR will determine immediate safeguards, preserve fairness and evidence, and seek advice or make referrals to the relevant LADO, police, DBS, professional regulator or other authority as appropriate. Where the concern relates to the DSL, it must be escalated to an authorised Leadership Team member and HR without involving the DSL in the initial decision.

Low-level concerns must also be recorded. A single event may appear minor but may contribute to a pattern or indicate transferable risk. Employment, contractual and safeguarding processes will be coordinated but remain distinct. No internal process will delay an urgent external safeguarding referral.

9. Information sharing, records and retention

- Record facts promptly, accurately and contemporaneously. Distinguish direct information, observation, professional judgement and third-party information.
- Share information only with people who need it to protect a person, manage the case or meet a legal or regulatory duty.
- Do not promise confidentiality. Explain, where safe and appropriate, what information will be shared and why.
- Store case information only in the restricted Safeguarding Hub or another specifically authorised case location. Chat, email and local devices are not the master record.
- Preserve original evidence and maintain a clear chronology, decision rationale, actions, owners, review dates and outcome.
- Apply the TQUK safeguarding retention schedule and secure destruction requirements. Any legal hold, police, LADO, litigation, insurance or regulatory requirement overrides routine destruction until formally released.
- Use anonymised information for trend reporting, training and governance wherever identifiable case detail is not necessary.

9.1 Current minimum retention position

Record	Minimum retention	Disposition
Safeguarding alerts, including scripts or emails involving a child	Until the child reaches age 25	Secure destruction

Referrals to another agency involving a child	Until the child reaches age 25	Secure destruction
Concerns about an adult's behaviour around children where TQUK holds a personnel or associate file	Until the adult reaches age 65 or for 10 years from the record, whichever is longer	Secure destruction
Other safeguarding and adult-at-risk records	Apply the current TQUK retention schedule and case-specific legal or safeguarding advice	Secure destruction

10. Quality assurance, monitoring and review

- Review safeguarding reports for timeliness, completeness, decision quality and completion of actions.
- Monitor themes across qualifications, apprenticeship assessment, centres, Construction department activity, online delivery, associates and external visits.
- Review training, DBS and Code of Conduct acknowledgement completion.
- Maintain a centre-readiness and action log for premises operated by the Construction department.
- Report anonymised trends, significant risks, overdue actions and learning to the appropriate governance forum.
- Review this policy at least annually and after material legislation, guidance, organisational change, serious incident or identified control failure.
- Test the reporting route and business-continuity arrangements periodically.

Appendix 1 - Immediate response card

1. Danger: Call 999 where anyone is in immediate danger or requires urgent medical help.

2. Listen: Stay calm, listen, reassure, do not promise confidentiality and do not ask leading questions.

3. Record: Write factual notes promptly, using the person's own words. Record time, location, people present and immediate action.

4. Report: Submit the TQUK Safeguarding Report Form without delay and before the end of the working day.

5. Preserve: Secure relevant evidence in the restricted Hub or as directed. Do not investigate or circulate information.

Portal: [TQUK Safeguarding Report Form](#)

Appendix 2 - Safeguarding categories and indicators

Safeguarding concerns often overlap. The following categories support recognition but are not exhaustive and are not a diagnostic checklist.

Context	Examples
Children	Physical abuse; sexual abuse; emotional abuse; neglect; exploitation; trafficking; county lines; child-on-child abuse; harmful sexual behaviour; domestic abuse; online harm; bullying; discrimination; radicalisation; missing episodes; self-harm and mental-health crisis.
Adults at risk	Physical, sexual, psychological, financial, discriminatory, organisational and domestic abuse; neglect and acts of omission; self-neglect; modern slavery and exploitation.
All people	Forced marriage; honour- or faith-based abuse; FGM; harassment; hate incidents; substance misuse; online grooming; coercive control; radicalisation and other circumstances creating risk of harm.

Appendix 3 - Key contacts

Contact	Details	Use
Emergency services	999	Immediate danger or urgent medical need
TQUK Safeguarding Team	TQUK Safeguarding Report Form / Safeguarding Hub	Primary internal route for all TQUK concerns
Construction department Safeguarding Contact	Steve Hattersley stevehattersley@constructionepa.com 07810 311663	Immediate onsite coordination; all concerns must also use the TQUK portal
NSPCC Helpline	0808 800 5000 nspcc.org.uk	Advice about a child
Childline	0800 1111 childline.org.uk	Confidential support for children and young people
Modern Slavery Helpline	08000 121 700 modernslaveryhelpline.org	Advice and reporting
Mind	0300 123 3393 mind.org.uk	Mental-health information and support

Appendix 4 - Statutory framework and guidance

- [Children Act 1989](#)
- [Children Act 2004](#)
- [Care Act 2014](#)
- [Safeguarding Vulnerable Groups Act 2006](#)
- [Counter-Terrorism and Security Act 2015](#)
- [Equality Act 2010](#)
- [Human Rights Act 1998](#)
- [Mental Capacity Act 2005](#)
- [Modern Slavery Act 2015](#)
- [Data Protection Act 2018](#)
- [Data \(Use and Access\) Act 2025](#)
- [Domestic Abuse Act 2021](#)
- [Keeping Children Safe in Education 2026](#)
- [Working Together to Safeguard Children 2026](#)
- [Prevent duty guidance for England and Wales](#)
- [Information sharing advice for safeguarding practitioners](#)
- [DBS: legal duty to refer](#)

Application note: Some statutory guidance applies directly to specified education providers rather than to TQUK in every capacity. TQUK uses it as a benchmark where relevant and requires centres and partners to meet the duties that apply to them.