



SAFEGUARDING POLICY



Version Number	Date	Purpose of Change	Classification	Sign Off
V4.1	20/10/2025	Legislation and statutory guidance updated to reflect 2025 frameworks including Working Together 2023, KCSIE 2025, Prevent Duty 2023, Domestic Abuse Act 2021 and Online Safety Act 2023.	Public	Kerry Ore

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1. SCOPE

1.1 This policy ensures Smart Awards fulfils its legal and moral responsibility to safeguard and promote the welfare of children, young people and adults at risk. It applies to all Smart Awards staff, contractors, assessors, EQAs, IQAs, board members and partners involved in qualification delivery and End-Point Assessment (EPA).

1.2 No individual will work with children or adults at risk on behalf of Smart Awards if they have been convicted or cautioned for relevant offences, are barred under the Safeguarding Vulnerable Groups Act 2006, or have been found guilty of safeguarding misconduct.

1.3 All those working for or on behalf of Smart Awards must complete the appropriate Disclosure and Barring Service (DBS) or Disclosure Scotland (PVG) checks and conform to Smart Awards' safeguarding principles and procedures.

1.4 Where Smart Awards works with employers or training providers for learners aged 16 to 18, it ensures partners have robust safeguarding arrangements consistent with this policy.

2. RESPONSIBILITIES

2.1 Smart Awards' CEO retains overall accountability for safeguarding and assigns a Designated Safeguarding Lead (DSL) - Head of Apprenticeships - with operational oversight and liaison with external agencies.

2.2. For the purposes of this policy, Smart Awards responsibilities cover:

- Statutory Requirements – Smart Awards ensure staff have awareness of, Working Together to Safeguard Children (DfE 2023) and Keeping Children Safe in Education (DfE 2025). These documents form part of the staff induction pack.
- Policy – It is the responsible of Directors and Senior Managers to ensure the Safeguarding policy is communicated to all staff and contractors. This policy forms part of staff and contractor's induction packs and is available on Smart Awards website. The policy is reviewed annually or at the point of policy change. A senior board member takes leadership responsibility for the organisation's safeguarding arrangements.
- Reports – Safeguarding reports are reported to the Board.
- Appointment of Designated Safeguarding Person –Smart Awards MD leads on safeguarding.
- Mandatory DBS Checks – Smart Awards undertake mandatory DBS checks all staff including those involved with end point assessment activities and enhanced DBS checks for all members of the Board.
- Training- training is mandatory for all staff who are involved in the delivery of end point assessments for apprenticeships. These staff also undertake a safeguarding online course to enhance their knowledge and understanding.

3. DEFINITIONS

3.1. In relation to children and young people, Smart Awards adopts the definition used in the Children Act 2004 and the Department for Education (DfE) guidance document: Working Together to Safeguard Children which define safeguarding and promoting children and young people's welfare 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, and
- taking action to enable all children to have the best outcomes.

3.2.A child is under the age of 18 years (as defined in the United Nations convention on the Rights of a Child).

3.3.A vulnerable adult is a person aged 18 years or over (as defined in the Safeguarding Vulnerable Group Act) who may be unable to take care of themselves or protect themselves from harm or from being exploited.

3.4. This may include a person who:

- Has a physical or sensory disability
- Has a learning disability
- Has a severe physical illness
- Is a substance misuser
- Is homeless.

3.5. Significant harm can take four forms:

- Physical harm
- Emotional harm
- Sexual harm
- Neglect

3.6. Possible signs of abuse include:

- Unexplained or suspicious injuries such as bruising cuts or burns.
- A vulnerable adult or child discloses abuse or describes what appears to be an abusive act.
- Someone else expresses concern about the welfare of a vulnerable adult or child.
- Unexplained change in behaviour such as withdrawal or sudden outbursts of temper
- Inappropriate sexual awareness or sexually explicit behaviour
- Distrust of adults
- Difficulty in making friends.
- Eating disorders, depression, self-harm

3.7 Online Safety. Under the Online Safety Act 2023, Smart Awards protects children and vulnerable adults in digital and remote learning environments by:

- Using secure platforms for communication and assessment.
- Prohibiting unsupervised one-to-one online contact.
- Reporting any online safety concerns to the DSL immediately.
- Providing staff with training on online and digital safeguarding.

4. PRINCIPLES

4.1. All who work for or represent Smart Awards must follow Smart Awards principles when in contact with children, young people or vulnerable adults to:

- Ensure the health, safety and welfare of any child or vulnerable adult.
- Minimise the risks of harm to the welfare of children and vulnerable adults.
- Adopt a relaxed, informal and friendly approachable manner.
- Ensure behaviour, language, gestures etc. are appropriate and above reproach.
- Always work in an open environment, avoiding private or unobserved situations
- Keep a physical and professional distance.
- Treat all children and vulnerable adults equally, with respect and dignity.
- Ensure that any activities are appropriate to the age, maturity and ability.
- Consistently display high standards of personal behaviour and appearance
- Where there are concerns about children and vulnerable adults' welfare, take immediate and appropriate action to address those concerns.
- Record any allegations.

4.2. When in contract with children and vulnerable adults' staff and those working on behalf of Smart

Awards must not:

- Engage in horseplay.
- Allow or engage in inappropriate touching of any kind.
- Make sexually suggestive comments.
- Have children or vulnerable adults on their own in a vehicle. Where circumstances require this another member of staff or appropriate person must travel in the vehicle
- Spend time alone outside of the normal training/ classroom situation.
- Engage in a personal relationship beyond that appropriate for a normal assessor/ learner relationship.
- Interaction with learners through a social networking site unless this has been agreed as part of managing collaborative learning.

5. THE PREVENT DUTY

5.1 Smart Awards complies with the Counter Terrorism and Security Act 2015 and the Prevent Duty Guidance 2023 to safeguard learners and staff from radicalisation and extremism.

5.2 Indicators of concern may include: discriminatory language or behaviour, sharing extremist content, withdrawal from peers, or attempts to recruit others to extremist ideologies.

5.3 Smart Awards will:

- Assess risk of radicalisation within its activities.
- Ensure staff are trained to identify and report concerns.
- Refer cases to the Channel Programme or police where appropriate.
- Work with local safeguarding partnerships and regulators to manage risks.

6. PROCEDURE IN THE EVENT OF A DISCLOSURE

6.1. All allegations or suspicions of abuse must be taken seriously. It is vitally important that any disclosure made in confidence is recorded factually as soon as possible; this is whether or not the matter is taken to another authority.

6.2. This procedure must be followed whenever an allegation of abuse is made or when there is a suspicion that a vulnerable adult has been abused.

- Allegation or suspicious of abuse reported.
- Any concerns should be discussed with Smart Awards within 24 hours.
- Details logged on risk register and reported to MD immediately.
- An accurate account shall be made as soon as possible of the nature of the allegation.
- All relevant details collated including:
 - Name, position and contact details of the person reporting the incident.
 - Name of child or vulnerable adult, contact details and date of birth.
 - Parent/ Guardian/ Carer contact details.
 - Date and time of what has occurred and the time the disclosure was made.
 - Details of the incident/ allegations/ suspicions.
- Smart Awards will consider any report, seeking legal advice where necessary, and will take action which may involve referral of the incident to the appropriate people or authorities (e.g. parents, police, DBS, social services) within 24 hours
- Review and consider any corrective or preventative action that maybe.
- Smart Awards will keep all sensitive information secure.

7. LEGISLATION

7.1 This policy is based on and complies with the following legislation and statutory guidance (current to October 2025):

- Working Together to Safeguard Children 2023 (DfE – statutory from April 2024)
- Keeping Children Safe in Education 2025 (DfE)
- Education Act 2002 (Sections 157 & 175)
- Children Acts 1989 & 2004
- Children and Social Work Act 2017
- Care Act 2014
- Domestic Abuse Act 2021
- Safeguarding Vulnerable Groups Act 2006
- Counter Terrorism and Security Act 2015 (*Prevent Duty Guidance 2023*)
- Online Safety Act 2023
- Data Protection Act 2018 and UK GDPR
- Public Interest Disclosure Act 1998 (Whistleblowing)

8. DBS CHECKS

8.1 Smart Awards operates safer recruitment practices and requires DBS (or PVG in Scotland) checks for all roles involving regulated activity.

8.2 Enhanced DBS checks are mandatory for those working directly with children or adults at risk.

8.3 Re-checks and monitoring via the DBS Update Service are used where applicable.

9. SAFEGUARDING PROCESS

Process Step Description	Process	Person Responsibility	Organisation Responsibility
Safeguarding concern or allegation raised	Concern reported verbally or in writing immediately to the Designated Safeguarding Lead (DSL) or deputy.	Centre Manager / Assessor / Learner / Apprentice / Contractor	Centre / Learner / Apprentice
Record and log concern	Concern is documented factually using the safeguarding concern form and logged on Smart Awards' secure risk register.	Designated Safeguarding Lead	Smart Awards
Initial review and triage	DSL reviews the information, assesses immediate risk, and decides next steps (e.g. immediate safety measures, escalation, or no further action).	Designated Safeguarding Lead	Smart Awards
Management review	Convene management meeting (if required) to determine: • Is there a safeguarding case? • Is immediate action required? • Does it require external referral?	Designated Safeguarding Lead and Responsible Officer	Smart Awards

Investigation and evidence gathering	Conduct internal investigation, request written accounts, and gather all relevant evidence. Ensure objectivity and confidentiality.	Designated Safeguarding Lead	Smart Awards
Notification to regulators and/or external agencies	If an Adverse Effect or safeguarding risk is identified, inform Ofqual/SQA and refer to local authority, police, or other relevant agencies within 24 hours.	Designated Safeguarding Lead and Responsible Officer	Smart Awards
Review and action outcome	DSL and Responsible Officer review evidence, decide on outcomes, corrective actions, and learning points.	Designated Safeguarding Lead and Responsible Officer	Smart Awards
Record keeping and closure	Final outcome recorded in safeguarding log and risk register. Sensitive data stored securely under GDPR.	Designated Safeguarding Lead	Smart Awards

10. REVIEW OF THIS POLICY

10.1. This policy is reviewed and revised annually in response to feedback, changes in legislation and guidance from the regulators, SQA Accreditation or Ofqual.

11. OFQUAL GENERAL CONDITIONS

11.1. D2.1: An awarding organisation must ensure that it complies with the requirements of Equalities Law in relation to each of the qualifications which it makes available.

11.2. D2.2: An awarding organisation must monitor qualifications which it makes available for any feature which could disadvantage a group of Learners who share a particular Characteristic.

11.3. D2.3: Where an awarding organisation has identified such a feature, it must – (a) remove any disadvantage which is unjustifiable, and (b) maintain a record of any disadvantage which it believes to be justifiable, setting out the reasons why in its opinion the disadvantage is justifiable.

12. QUALIFICATIONS SCOTLAND ACCREDITATION PRINCIPLES

12.1 Principle 14. The awarding body and its providers must ensure that its qualifications and their delivery and assessment are fair, inclusive and accessible to learners.

12. 2 Principle 6: Awarding bodies must manage risk and data protection effectively.