

Duty of Care, Safeguarding and Prevent Policy

Apprenticeship Assessment Organisation

V1 October 2026

Contents

1. Purpose	3
2. Scope.....	3
3. Policy Principles.....	3
4. Definitions and Types of Concern	3
5. Roles and Responsibilities	4
6. Reporting and Responding to Safeguarding Concerns.....	4
7. Immediate Danger and Emergency Action	5
8. Guidance for Managing a Disclosure	5
9. Allegations About Staff, Assessors or Associates	5
10. Prevent and Radicalisation.....	6
11. Safer Recruitment and Professional Boundaries.....	6
12. Online and Remote Assessment Safeguarding	7
13. Information Sharing, Confidentiality and Record-Keeping	7
14. Training and Awareness	7
15. Monitoring, Governance and Policy Review	7
16. Legal and Regulatory Framework.....	8
Appendix A – Safeguarding Concern Record Form	9

1. Purpose

This policy sets out how the Chartered Institution of Railway Operators (CIRO), acting through its Apprenticeship Assessment Organisation (AAO), will safeguard young people and adults at risk who engage with its apprenticeship assessment activities. It establishes arrangements to prevent harm, respond to concerns, fulfil the Prevent duty where applicable, and promote a culture in which welfare is everyone's responsibility.

2. Scope

This policy applies to all CIRO employees, directors, contractors, associates, independent assessors, internal quality assurers, consultants and volunteers involved in AAO activity. It covers interactions with apprentices, employers, training providers and other stakeholders, whether conducted face to face, remotely, by telephone, through digital platforms or at third-party premises.

- All apprentices, including those under 18 and adults who may be at risk.
- All stages of assessment, including planning, reasonable-adjustment discussions, assessment delivery, moderation, appeals and post-assessment contact.
- All locations and communication channels used for AAO business.
- Concerns arising inside or outside CIRO activity where information indicates that a person may be at risk of harm, abuse, neglect, exploitation or radicalisation.

Where an employer or training provider has primary day-to-day safeguarding responsibility, CIRO will cooperate with that organisation while retaining responsibility for concerns identified through its own work.

3. Policy Principles

- **Welfare first** – the safety and wellbeing of the individual take priority.
- **Person-centred practice** – individuals should be heard, respected and involved where it is safe and appropriate.
- **Prompt action** – concerns are reported without delay
- **Proportionality** – action reflects the nature, seriousness and immediacy of the risk.
- **Confidentiality** – information is shared only with those who need it to protect people or meet legal duties.
- **Equality and accessibility** – safeguarding arrangements are inclusive and reasonable adjustments are made where required.
- **Partnership working** – CIRO works with employers, training providers, local safeguarding partners, police and other agencies as appropriate.

4. Definitions and Types of Concern

Safeguarding means protecting a person's right to live safely, free from abuse, neglect and exploitation, and taking action to promote welfare. A **child** is anyone under 18. An **adult at risk** is an

adult who has care and support needs, is experiencing or at risk of abuse or neglect, and may be unable to protect themselves because of those needs.

- Physical, emotional or sexual abuse; neglect; domestic abuse; discriminatory or organisational abuse.
- Financial or material abuse, modern slavery, trafficking, forced labour or criminal exploitation.
- Bullying, harassment, cyberbullying, online abuse, grooming, stalking or coercive control.
- Self-neglect, self-harm, suicidal thoughts or an immediate threat to life or safety.
- Female genital mutilation, forced marriage, honour-based abuse or other harmful practices.
- Radicalisation or susceptibility to extremist influence under the Prevent duty.
- Abuse by a person in a position of trust, including concerns or allegations about CIRO personnel.

Indicators may include unexplained injuries, changes in behaviour or attendance, fearfulness, distress, inappropriate control by another person, unsafe online contact, financial irregularities, concerning statements or unexplained deterioration in wellbeing. One indicator does not prove abuse; concerns must nevertheless be reported and considered.

5. Roles and Responsibilities

- **CIRO Board and senior leadership** provide oversight, resources and assurance that safeguarding arrangements are effective.
- **Head of EPA** is accountable for implementation of this policy within the AAO and for ensuring appropriate escalation and external notification.
- **CIRO's organisation-wide Designated Safeguarding Lead (DSL)** provides specialist safeguarding advice and oversight, supports the Head of EPA with risk assessment and referrals, and coordinates wider organisational or statutory escalation where required.
- **EPA Supervisor and managers** ensure staff and associates understand reporting routes, complete required training and apply safer working practices.
- **Assessors, IQAs, staff, contractors and associates** must remain alert, respond appropriately to disclosures, report concerns immediately and maintain professional boundaries.
- **Employers and training providers** should provide current safeguarding contacts and cooperate with proportionate information sharing and action.

All AAO safeguarding concerns should be reported to the Head of EPA.

6. Reporting and Responding to Safeguarding Concerns

Any person who sees, hears, receives a disclosure of, or otherwise suspects a safeguarding concern must report it to the Head of EPA without delay and on the same working day. If the concern relates to the Head of EPA, it must be reported directly to CIRO's organisation-wide DSL or an uninvolved senior leader. The reporter should not investigate, confront an alleged perpetrator or wait for proof.

1. Make the person safe and obtain emergency assistance if there is an immediate risk.
2. Listen calmly, take the concern seriously and avoid leading questions.
3. Explain that information cannot be kept secret and will be shared only with people who need to act.
4. Record the facts promptly using the individual's own words where possible, including date, time, location, people present and action taken using **F029 Safeguarding Concern Record Form (Appendix A.)**
5. Send the record securely to the Head of EPA; do not retain informal copies.
6. The Head of EPA will assess immediate risk, agree protective action and liaise with the employer or training provider in the first instance as the ultimate responsibility for managing safeguarding risks sits with them.
7. The Head of EPA will consult or escalate to CIRO's organisation-wide DSL for specialist advice, statutory referral or wider organisational action when required.

7. Immediate Danger and Emergency Action

If anyone is in immediate danger, requires urgent medical assistance or a crime is in progress, call 999. Staff should then notify the Head of EPA as soon as it is safe to do so. If a child or adult at risk may face significant harm and the Head of EPA cannot be reached, the concern must be referred directly to CIRO's organisation-wide DSL, the relevant local authority safeguarding service or the police; internal notification must not delay protective action.

8. Guidance for Managing a Disclosure

- Stay calm, listen and allow the person to speak at their own pace.
- Reassure them that they have done the right thing by speaking up, but do not promise a particular outcome.
- Do not ask leading or repeated questions; clarify only what is necessary to understand immediate risk.
- Do not promise confidentiality. Explain who the information must be shared with and why.
- Preserve any evidence and create an accurate, dated record as soon as possible.
- Do not contact parents, carers, employers or the alleged perpetrator unless authorised by the Head of EPA or CIRO's organisation-wide DSL, as doing so may increase risk or compromise an investigation.

9. Allegations About Staff, Assessors or Associates

Any allegation that a person working for or on behalf of CIRO has harmed, may have harmed, behaved inappropriately towards, or may pose a risk to a child or adult at risk must be reported immediately to the Head of EPA. The Head of EPA will notify and seek support from CIRO's organisation-wide DSL. If the concern relates to the Head of EPA, it must be reported directly to the organisation-wide DSL or an uninvolved senior leader or Board representative. CIRO will protect

those involved, preserve evidence, avoid prejudicing external enquiries and seek advice from the relevant local authority designated officer or adult safeguarding service, police, Disclosure and Barring Service, regulator or awarding bodies where applicable.

Interim measures, such as changing duties or assessment arrangements, may be taken following a risk assessment and do not imply guilt. Internal fact-finding will be coordinated with, and must not obstruct, any statutory investigation. Relevant employment, disciplinary, complaints and whistleblowing procedures will be followed.

10. Prevent and Radicalisation

CIRO will have due regard to preventing people from being drawn into terrorism where the Prevent duty applies to its activities. Staff must remain alert to signs that an individual may be susceptible to radicalising influences, such as concerning changes in behaviour, language, associations or online activity. Indicators must be considered in context and must never be used to stereotype or discriminate.

Prevent concerns must be passed promptly to the Head of EPA, who will assess the immediate risk and consult CIRO's organisation-wide DSL where required. They will obtain advice from the employer or training provider's safeguarding lead, the local authority Prevent team, police or Channel process as appropriate. In an emergency call 999. Staff involved in relevant activity will receive proportionate Prevent awareness training, and assessment materials and discussions will support lawful debate, respect and inclusion without suppressing legitimate views.

11. Safer Recruitment and Professional Boundaries

- Roles will be risk assessed and identity, references, employment history, qualifications and right-to-work checks completed as appropriate.
- Where legally eligible and proportionate, the appropriate level of Disclosure and Barring Service check will be obtained and renewed or monitored in line with organisational arrangements.
- Safeguarding expectations will be included in induction, contracts, codes of conduct and ongoing supervision.
- Personnel must use authorised communication channels, maintain professional language and avoid inappropriate personal relationships, gifts, social-media contact or sharing personal contact details.
- One-to-one activity must be planned transparently, take place in suitable settings and follow employer, training-provider and CIRO safeguarding arrangements.
- Any boundary concern or low-level concern must be reported to a manager or the Head of EPA rather than managed informally; the Head of EPA will involve CIRO's organisation-wide DSL where appropriate.

12. Online and Remote Assessment Safeguarding

- Use only CIRO-approved platforms, accounts and devices for assessment communication.
- Confirm the identity of attendees and whether anyone else is present or able to hear the session.
- For apprentices under 18 or adults at risk, agree suitable supervision, emergency contact and escalation arrangements with the employer or training provider before assessment.
- Ensure the setting protects privacy and does not expose personal or sensitive information.
- Do not record sessions unless there is a lawful, authorised purpose and the participants have been informed.
- End or pause a session if the environment becomes unsafe, inappropriate or inconsistent with agreed arrangements, and report the concern.

13. Information Sharing, Confidentiality and Record-Keeping

Safeguarding information will be handled lawfully, fairly and securely in line with UK data-protection law and CIRO's information-governance arrangements. Consent should be sought where appropriate, but information may be shared without consent where this is necessary and proportionate to protect a person, prevent or detect crime, comply with a legal duty or support a statutory safeguarding function.

Records must distinguish fact, observation and opinion; identify decisions, reasons, referrals and outcomes; and be stored separately from routine assessment records with access limited to authorised personnel. Records will be retained and securely disposed of in accordance with the applicable retention schedule. Information will be shared on a need-to-know basis. The Head of EPA will maintain an auditable chronology of actions, with relevant records shared securely with CIRO's organisation-wide DSL when escalation or specialist oversight is required.

14. Training and Awareness

All relevant personnel will receive safeguarding and Prevent information at induction and refresher learning at intervals set by CIRO's risk assessment and regulatory obligations. Training will cover signs of abuse, professional boundaries, responding to disclosures, reporting routes, online safety, information sharing and whistleblowing.

15. Monitoring, Governance and Policy Review

The Head of EPA, supported by CIRO's organisation-wide DSL, will monitor concerns, response times, referrals, themes, training completion and lessons learned while protecting confidentiality. Significant incidents, recurring themes and control weaknesses will be escalated through CIRO governance arrangements. This policy will be reviewed at least annually and sooner following

legislative or regulatory change, a serious incident, identified learning or material change to AAO delivery.

16. Legal and Regulatory Framework

This policy should be read alongside current applicable legislation and statutory guidance, including the Children Acts 1989 and 2004, Care Act 2014, Counter-Terrorism and Security Act 2015, Safeguarding Vulnerable Groups Act 2006, Equality Act 2010, Data Protection Act 2018 and UK GDPR, Human Rights Act 1998, Modern Slavery Act 2015, and relevant government guidance on safeguarding and Prevent. It should also be read with CIRO policies on safer recruitment, data protection, complaints, whistleblowing, disciplinary matters, equality, health and safety, reasonable adjustments, online safety and business continuity.

Author	S Turner
Version	V1
Policy No	P006
Published Date	22/09/2026
Date of Next Review	22/09/2027
Signature	

Appendix A – Safeguarding Concern Record Form

F029 Safeguarding Concern Record Form

CONFIDENTIAL – Complete as soon as possible and send securely to the Head of EPA. Record facts and the person's own words; do not investigate. The Head of EPA will involve CRO's organisation-wide Designated Safeguarding Lead where specialist advice or escalation is required.	
1. Details of Person completing this form	
Full name	
Job title / role	
Organisation	
Telephone and email	
Date and time form completed	
2. Details of Person at risk	
Full name	
Date of birth / age, if known	
Apprenticeship standard / employer / provider	
Contact details, if known	
Child under 18 or adult at risk?	☐ Child under 18 ☐ Adult at risk ☐ Not known
Relevant communication or accessibility needs	
3. Details of concern, incident, observation or disclosure	
Date and time	
Location / platform	
How did the concern arise?	☐ Disclosure ☐ Observation ☐ Report from another person ☐ Online / remote activity ☐ Other (please specify): _____
Type of concern	☐ Physical abuse ☐ Emotional abuse ☐ Sexual abuse ☐ Neglect ☐ Domestic abuse ☐ Financial abuse ☐ Bullying / harassment ☐ Exploitation / modern slavery ☐ Self-harm / suicide risk ☐ Prevent / radicalisation ☐ Professional-boundary concern ☐ Other (please specify):

Factual account of what was seen, heard or disclosed <i>Use the person's exact words where possible. State clearly what you personally observed and distinguish fact from opinion.</i>		
Names and contact details of witnesses or other people present		
Name and details of any person alleged to have caused harm, if known		
4. Details of Immediate risk and action taken		
Is anyone in immediate danger?	☐ Yes ☐ No ☐ Not known	
Emergency services contacted?	☐ Yes ☐ No If yes, give time, service contacted and reference number:	
Immediate safety, medical or protective action taken		
Evidence preserved or attached	☐ None ☐ Email / message ☐ Screenshot ☐ Photograph ☐ Other: Do not copy, forward or retain sensitive material unnecessarily.	
5. Details of reporting and escalation		
Head of EPA informed	Name: Date: Time: Method: ☐ Telephone ☐ Email ☐ In person ☐ Other (please specify):	
Other person or organisation informed	Name / organisation: Date and time:	
Advice received, referral made or further action agreed		
6. Reporter declaration		
I confirm that this record is accurate to the best of my knowledge and was completed promptly. Name: Signature: Date:		
7. Head of EPA use only		
Risk assessment and decision		
Referral / notification details		

Follow-up actions, owner and due date	
Outcome / closure rationale	
Head of EPA name: Signature: Date reviewed: Date closed: Case reference: Escalated to CIRO organisation-wide DSL? ☐ Yes ☐ No <i>If yes, date and name:</i>	