

Academic Programs & Services LLC

Safeguarding and Child Protection Policy

Table of Contents

Purpose and Commitment.....	3
Scope and Application.....	3
Legal and Regulatory Context.....	4
Safeguarding Principles.....	4
Safeguarding Governance and Roles & Responsibilities.....	6
Code of Conduct and Professional Boundaries.....	9
Recruitment, Screening, and Suitability.....	11
Supervision, Accommodation, and Welfare Arrangements.....	13
Reporting, Escalation, and Incident Response.....	15
Managing Allegations Against Staff or Volunteers.....	18
Records, Confidentiality, and Information Sharing.....	19
Policy Review and Governance.....	21

Purpose and Commitment

Academic Programs & Services LLC (the “**Organisation**” “**we**”, “**our**” or “**us**”) delivers in-person, residential, travel-based, and laboratory-based programmes for young people. These environments involve heightened safeguarding responsibilities compared with remote or online engagement.

The purpose of this policy is to:

- Protect children and young people participating in the Organisation’s programmes;
- Recognise and address the elevated safeguarding risks associated with residential, travel, and in-person activities;
- Establish clear standards of supervision, conduct, and response;
- Provide assurance to participants, parents, partner institutions, and regulators that appropriate safeguarding arrangements are in place.

The Organisation recognises that participants in residential and travel-based programmes may be in unfamiliar environments and separated from their usual support networks. This increases reliance on supervisory staff and heightens safeguarding responsibilities.

Where the Organisation assumes responsibility for the supervision, accommodation, or welfare of participants, it acknowledges a corresponding duty of care. Safeguarding is integral to programme design, delivery, and oversight.

Scope and Application

This policy applies to all in-person and higher-risk youth programmes delivered by the Organisation, including but not limited to residential, travel-based, laboratory-based, and intensive academic programmes.

This includes programmes such as Oxbridge Summer Scholars, Indigo Research, and any future youth programmes delivered by the Organisation.

The policy applies to:

- All staff, contractors, programme directors, tutors, instructors, supervisors, chaperones, volunteers, guest contributors, and operational personnel;
- All programme locations, including the United Kingdom, the United States, and any other jurisdiction in which programmes are delivered;
- All programme-related activities, including academic sessions, social activities, excursions, accommodation, travel, and supervised free time.

For the purposes of this policy:

- A child or young person (used interchangeably) refers to any participant under the age of 18.
- Where participants are aged 18 or over, safeguarding standards appropriate to the programme context and supervisory environment will continue to apply.

This policy applies whether programmes are delivered solely by the Organisation or co-delivered with partner schools, universities, or other institutions. Where safeguarding responsibilities are shared, roles and responsibilities must be clearly defined in writing. The Organisation retains responsibility for implementing appropriate safeguarding measures within its own operations.

This policy is externally publishable and applies to all individuals engaged in programme delivery, regardless of employment status.

Legal and Regulatory Context

The Organisation operates internationally and complies with applicable child protection and safeguarding laws in each jurisdiction in which programmes are delivered.

Where legal or regulatory standards differ between jurisdictions, the Organisation will apply the higher or more protective standard where reasonably practicable.

Programmes delivered in England operate with reference to recognised safeguarding expectations applicable to youth, residential, and educational programme environments, including relevant principles reflected in [*Keeping Children Safe in Education \(KCSIE\)*](#), [*Working Together to Safeguard Children*](#), and applicable safeguarding and health and safety legislation.

Programmes delivered in the United States operate in accordance with applicable federal and state child protection, mandatory reporting, and youth programme requirements.

Jurisdiction-specific legal obligations and procedural requirements may be set out in supporting appendices or operational guidance. This policy sets out overarching safeguarding standards. It does not replace or override applicable local law.

Safeguarding Principles

The Organisation's approach to safeguarding is guided by the following principles, which inform decision-making, supervision, escalation, and response across all in-person and residential programme contexts.

Best Interests of the Young Person

The safety and wellbeing of the child or young person are primary considerations in all safeguarding decisions.

Where the Organisation assumes supervisory responsibility, decisions are made with a focus on protecting the child or young person from harm, supporting their welfare, and managing foreseeable risks associated with residential, travel-based, or in-person environments. The young person's age, circumstances, and expressed views will be taken into account where appropriate.

Early Reporting

Safeguarding concerns must be reported as soon as they arise, even where information is incomplete or uncertainty exists.

Individuals are not expected to determine whether abuse or harm has occurred. The responsibility to assess concerns and determine next steps sits with designated safeguarding roles.

In residential and higher-risk environments, prompt reporting is essential to ensure that protective measures can be implemented without delay.

Proportionality

Safeguarding responses must be proportionate to the nature, seriousness, and immediacy of the concern. This includes:

- Taking prompt and decisive action where there is an immediate risk of harm; and
- Avoiding unnecessary escalation where concerns can be addressed appropriately through supervision, support, monitoring, or referral.

Proportionality requires the exercise of informed professional judgment within established safeguarding frameworks, rather than inaction or automatic escalation.

Role Clarity and Professional Boundaries

All staff and representatives of the Organisation are responsible for recognising and reporting safeguarding concerns within the scope of their role.

They are not expected to conduct formal investigations, determine criminal liability, diagnose medical or psychological conditions, or provide therapeutic services unless appropriately qualified and authorised. Their role is to observe, document, respond appropriately, and escalate concerns in accordance with this policy.

The Designated Safeguarding Lead (DSL) may undertake preliminary safeguarding assessment and coordination in order to determine appropriate protective measures, supervision arrangements, or referrals. However, criminal investigation, forensic assessment, and formal determination of abuse allegations remain the responsibility of relevant external authorities and qualified professionals.

Clear professional and behavioural boundaries must be maintained at all times, particularly in residential, travel, laboratory, and one-to-one environments. Safeguarding assessments, escalation decisions, and external referrals are managed by designated safeguarding roles.

Shared Responsibility and Supervisory Accountability

Safeguarding is a collective organisational responsibility supported by clear systems, training, supervision structures, and governance oversight from the Board of the Organisation.

Where the Organisation assumes responsibility for participant supervision or accommodation, it accepts a responsibility to take reasonable steps to protect participants from foreseeable harm.

No individual is expected to manage safeguarding concerns in isolation. Concerns must be escalated through established channels to ensure appropriate oversight, consistency, and support.

Cultural and Jurisdictional Awareness

Programmes are delivered across diverse cultural and legal contexts. Safeguarding responses should be informed by relevant cultural considerations and applicable local law.

Cultural sensitivity does not override the obligation to act where a child or young person may be at risk of harm. Where uncertainty exists, concerns must be reported and assessed through designated safeguarding channels.

Safeguarding Governance and Roles & Responsibilities

The Organisation maintains a safeguarding governance structure appropriate to residential, travel-based, laboratory, and other higher-risk youth programme environments.

Safeguarding responsibility is shared across the Organisation, with clearly defined roles and escalation pathways.

Designated Safeguarding Lead (DSL)

The Organisation appoints a Designated Safeguarding Lead (DSL) with overall responsibility for safeguarding oversight across all programmes. The DSL is responsible for:

- Oversight of safeguarding policy implementation;
- Receiving and reviewing safeguarding concerns;
- Determining appropriate protective measures;
- Deciding on escalation to parents, guardians, partner institutions, or external authorities where required;
- Ensuring safeguarding records are maintained appropriately;
- Liaising with relevant authorities where necessary;
- Advising programme leadership on safeguarding risk management.

The DSL holds primary responsibility for safeguarding assessments and escalation decisions under this policy.

Deputy Safeguarding Leads

The Organisation will, whenever possible, appoint one or more Deputy Safeguarding Leads to ensure continuity of safeguarding oversight, including during residential programmes and across time zones.

Deputies act with delegated authority in the absence of the DSL and support ongoing safeguarding monitoring during programme delivery.

Programme Director

The Programme Director is responsible for ensuring that safeguarding arrangements are implemented operationally during programme delivery. This includes:

- Ensuring appropriate supervision arrangements are in place;
- Supporting safeguarding risk assessments prior to programme commencement;
- Ensuring that safeguarding concerns are escalated promptly to the DSL or Deputies;
- Cooperating with safeguarding investigations or reviews as required.

The Programme Director does not replace or override the authority of the DSL in safeguarding decision-making. The Programme Director may from time to time also act as the DSL or Deputy.

Residential Supervisors and Chaperones

Residential Supervisors and Chaperones have direct responsibility for participant supervision during accommodation, travel, and supervised activities. Their duties include:

- Maintaining appropriate supervision of participants;
- Ensuring clarity regarding participant whereabouts;
- Enforcing behavioural expectations and boundaries;
- Identifying and reporting safeguarding concerns promptly;

- Implementing immediate protective measures where required to ensure safety.

Supervisory roles carry a responsibility to take reasonable steps to prevent foreseeable harm.

Tutors, Instructors, and Laboratory Supervisors

Tutors, instructors, and laboratory supervisors are responsible for:

- Maintaining professional boundaries with participants;
- Ensuring safe conduct during academic, laboratory, or practical activities;
- Reporting safeguarding concerns promptly;
- Complying with supervision and safeguarding instructions issued by programme leadership or safeguarding roles.
- Laboratory-based environments must include additional risk awareness and oversight appropriate to the setting.

Operations and Logistics Personnel

Operations and logistics staff involved in programme planning or delivery are responsible for:

- Supporting safeguarding risk assessments;
- Ensuring accommodation, travel, and venue arrangements meet safety expectations;
- Escalating safeguarding concerns that arise within their area of responsibility.

All Staff, Contractors, and Volunteers

All individuals engaged in programme delivery must:

- Comply with this policy;
- Complete any safeguarding training required by the Organisation;
- Maintain appropriate professional conduct;
- Report safeguarding concerns promptly;
- Cooperate with safeguarding assessments and investigations.

No individual may assume that safeguarding responsibility rests solely with another person.

Legal and Compliance

The Legal & Compliance function provides advice on regulatory obligations, mandatory reporting requirements, contractual safeguarding clauses, and serious incident management.

Code of Conduct and Professional Boundaries

All staff, contractors, supervisors, tutors, chaperones, volunteers, and representatives of the Organisation are required to maintain appropriate professional conduct and boundaries at all times during programme delivery.

These standards apply throughout the full duration of a programme, including academic sessions, accommodation, travel, excursions, and supervised free time. Professional responsibilities do not cease outside classroom settings during residential programmes.

Individuals must act in a manner that prioritises the safety and wellbeing of participants. Conduct must remain respectful, measured, and consistent with the supervisory role assumed by the Organisation. Behaviour that could reasonably be perceived as inappropriate, exploitative, overly familiar, or demonstrating favouritism is not permitted.

Participants are also required to comply with programme behavioural standards as a condition of participation. Serious or repeated breaches of those standards may result in protective or disciplinary measures in accordance with programme terms, including, where necessary, restrictions on participation or removal from the programme.

One-to-One Interactions

One-to-one engagement with participants should only occur for legitimate programme-related purposes. Wherever reasonably practicable, such interactions should take place in observable or open environments and not in isolated or closed settings. Unsupervised, secluded, or non-programme-related one-to-one contact is not permitted.

Where individual academic or welfare support is required, this must be delivered in a manner consistent with safeguarding principles and subject to appropriate oversight.

Physical Contact

Physical contact must be appropriate to the context, proportionate, and justifiable. Contact that is unnecessary, prolonged, without consent, or open to misinterpretation must be avoided. The Organisation expects staff to exercise professional judgment and err on the side of caution in maintaining clear physical boundaries.

Residential and Accommodation Boundaries

During residential programmes, clear separation between staff and participant accommodation must be maintained. Staff must not share bedrooms or sleeping quarters with participants under any circumstances.

Entry into participant bedrooms or private accommodation areas should occur only where necessary for safety, welfare, or operational reasons, and in accordance with established procedures. Supervisory arrangements must ensure that participants' whereabouts are known and that appropriate oversight is maintained throughout the programme.

Alcohol, Substances, and Professional Fitness

Staff must not provide alcohol, tobacco, vaping products, or controlled substances to participants. Staff must not consume alcohol or other impairing substances while on duty, while responsible for participant supervision, or during programme periods where they may reasonably be required to respond to participant welfare, safety, or safeguarding matters.

Staff who become aware of participant use or possession of alcohol, tobacco, vaping products, controlled substances, or other prohibited items must report the matter promptly through appropriate safeguarding or programme escalation channels.

At all times, individuals engaged in programme delivery must remain fit to discharge their supervisory responsibilities safely.

Digital Communication and Social Media

Digital communication with participants must be limited to legitimate programme-related purposes and conducted through approved channels wherever possible. Personal social media connections, private messaging outside authorised platforms, or non-programme-related digital contact are not permitted.

Relationships and Conflicts of Interest

Personal, romantic, or otherwise inappropriate relationships between staff and participants are strictly prohibited. Conduct that creates a conflict of interest, perceived exploitation, or boundary blurring is inconsistent with safeguarding responsibilities and must be avoided.

Bullying and Peer Exploitation

Bullying, coercion, sexualised peer behaviour, and exploitation between participants may constitute safeguarding concerns and must be addressed in accordance with this policy.

Breaches of Conduct

Concerns regarding conduct must be reported promptly through safeguarding channels. Reporting pathways and safeguarding contact information will be communicated to staff and participants prior to and during programme delivery.

Breaches of this Code may result in immediate protective measures, removal from supervisory duties, investigation, or referral to relevant authorities where required.

Concerns involving boundary blurring, poor professional judgment, or low-level inappropriate conduct should also be reported and assessed, even where no immediate safeguarding harm is identified.

Recruitment, Screening, and Suitability

The Organisation is committed to child-safe recruitment practices for all roles involving interaction with participants.

No individual may commence programme delivery, supervision, or participant-facing duties until applicable screening and suitability requirements have been completed and confirmed.

Safeguarding suitability is assessed prior to engagement and remains subject to ongoing review.

Identifying Higher-Risk Roles

Prior to recruitment, the Organisation assesses whether a role involves direct contact with young people and the level of supervision responsibility it carries. Enhanced screening requirements apply to roles that involve:

- Residential supervision or overnight responsibilities;
- One-to-one or small group in-person contact;
- Laboratory-based or practical supervision;
- Travel with participants;
- Welfare or pastoral oversight responsibilities.

The level of screening is proportionate to the nature, frequency, and context of contact with participants.

Pre-Engagement Screening

Individuals engaged in participant-facing roles must undergo appropriate screening and verification measures. These may include, as relevant to the jurisdiction and role:

- Verification of identity;
- Confirmation of right to work in the relevant jurisdiction;
- Criminal history or background checks appropriate to the jurisdiction;
- Reference checks;
- Verification of qualifications, employment history, or professional registrations;

- Confirmation of relevant safeguarding training or experience.

Where programmes are delivered in the United Kingdom, enhanced background checks (via DBS) may be required in accordance with recognised safeguarding practice. Where programmes are delivered in the United States, appropriate federal or state-level screening measures will be applied.

Jurisdiction-specific screening requirements may be set out in supporting appendices or operational procedures.

Suitability Assessment

Recruitment processes for participant-facing roles must include consideration of safeguarding responsibilities and professional boundaries. Interview processes should assess a candidate's:

- Understanding of child vulnerability and adult duty of care;
- Awareness of appropriate professional boundaries;
- Willingness to comply with safeguarding training and reporting obligations;
- Ability to respond appropriately to welfare concerns or disclosures.

Prior safeguarding experience is not required in all roles, provided the individual demonstrates willingness to comply with safeguarding expectations and training requirements. Attitudes that minimise or dismiss safeguarding responsibilities must be treated as a concern and escalated appropriately.

Approval Prior to Commencement

Programme-facing duties must not begin until required screening checks have been completed and recorded in approved systems.

Responsibility for confirming completion of screening requirements rests with the appropriate recruitment or operational function, in coordination with safeguarding leadership where necessary.

Where safeguarding concerns arise during recruitment, engagement may be delayed, restricted, or declined.

Ongoing Suitability

Safeguarding suitability is not limited to the point of recruitment. Individuals engaged in programme delivery are expected to:

- Maintain ongoing suitability to work with children;

- Consent to subsequent criminal history or background checks;
- Disclose relevant changes in circumstances that may affect their suitability;
- Comply with safeguarding training requirements;
- Adhere to this policy and associated codes of conduct.

Where concerns arise regarding suitability after engagement, the matter must be escalated to the Designated Safeguarding Lead for assessment and appropriate action.

Third-Party and Guest Contributors

Where the Organisation engages third-party providers, guest lecturers, laboratory hosts, or partner personnel who interact with participants, the Organisation will:

- Assess the safeguarding arrangements of the third party;
- Confirm that appropriate screening measures have been undertaken; or
- Implement additional supervision or protective measures where required.

Safeguarding responsibility cannot be delegated solely through contractual arrangements.

Supervision, Accommodation, and Welfare Arrangements

The Organisation recognises that residential, travel-based, and in-person programmes involve elevated safeguarding risks. Appropriate supervision and welfare arrangements are therefore central to programme design and delivery.

Safeguarding considerations form part of programme planning, staffing allocation, accommodation selection, and daily operational oversight.

Supervision and Participant Oversight

Participants must be appropriately supervised at all times during programme delivery, including academic sessions, excursions, accommodation periods, and supervised free time. The Organisation ensures that:

- Supervision arrangements are proportionate to participant age, group size, and activity risk;
- Clear responsibility for participant oversight is allocated to named staff members;
- Participant whereabouts are known during programme activities;
- Supervisory staff are accessible to participants throughout the programme.

Structured supervision arrangements must be in place during programme periods. Depending on participant age, programme context, and risk assessment, this may include appropriately managed remote supervision arrangements.

Residential and Accommodation Arrangements

Where accommodation is provided through third-party providers or university facilities, the Organisation assesses the suitability of the accommodation environment prior to use. This may include shared educational or residential environments in which individuals not affiliated with the Organisation are also present. Associated safeguarding risks must be considered through programme risk assessment and appropriate supervisory and protective measures.

Residential safeguarding arrangements include:

- Appropriate separation between staff and participant sleeping and private accommodation areas;
- Clear allocation of residential supervisory responsibilities;
- Established procedures for room checks or welfare checks where appropriate;
- Mechanisms for participants to raise welfare and safeguarding concerns during residential stays.

The Organisation retains responsibility for safeguarding oversight within accommodation settings used for programme purposes.

Travel and Excursions

Travel to, from, and during programmes must be planned and supervised in a manner consistent with safeguarding principles. This includes:

- Clear allocation of supervisory responsibility during transit;
- Defined meeting points and check-in procedures;
- Risk assessment of planned excursions or external visits.

Participants must remain subject to appropriate supervision arrangements during programme-organised travel, which may include appropriately managed remote supervision arrangements depending on participant age, programme context, and risk assessment.

Risk Assessment and Programme Planning

Each programme must undergo safeguarding risk assessment prior to commencement.

Risk assessments consider, as appropriate:

- Participant age profile;
- Accommodation type;
- Location and local context;
- Activity risk (including laboratory environments);
- Supervision structure;
- Medical or welfare considerations.

Risk assessments are drafted by the DSL in consultation with other safeguarding roles (if necessary), reviewed by programme leadership, and approved by Legal and Compliance.

Welfare Support

Participants must have access to appropriate welfare support during programmes. This includes:

- Clear information on how to raise concerns about their own welfare and safety, or that of another participant;
- Access to supervisory staff;
- Procedures for responding to illness, injury, or welfare concerns;
- Escalation pathways for serious safeguarding matters.

Where participants are aged 18 or over, welfare support remains available in light of the residential and supervisory context of the programme.

Reporting, Escalation, and Incident Response

Safeguarding concerns must be reported and addressed promptly. The Organisation maintains clear reporting and escalation arrangements appropriate to residential and higher-risk programme environments.

All staff, contractors, supervisors, and representatives are required to raise safeguarding concerns as soon as they arise. Individuals are not expected to determine whether abuse or harm has occurred before reporting.

Safeguarding decisions, particularly in serious or complex matters, must not be made in isolation where consultation with the Designated Safeguarding Lead or Deputy is reasonably available.

Immediate Risk

Where a participant is believed to be at immediate risk of serious harm, emergency services must be contacted without delay.

Expressions of suicidal ideation, credible self-harm risk, or serious mental health crisis must be treated as safeguarding concerns requiring immediate escalation.

Immediate protective measures may be implemented to ensure participant safety while awaiting further instruction from the Designated Safeguarding Lead or relevant authorities.

Emergency action must not be delayed in order to seek internal approval.

Internal Reporting

Safeguarding concerns must be escalated promptly to the Designated Safeguarding Lead or a Deputy. Concerns may arise from:

- Direct disclosure by a participant;
- Observation of behaviour or indicators of harm;
- Information received from parents, partners, or third parties;
- Allegations involving staff, contractors, or volunteers.

All safeguarding concerns must be documented appropriately.

Staff must not conduct independent investigations beyond clarifying factual information necessary to make a report.

Individuals who raise safeguarding concerns in good faith will be supported and will not be penalised for making a report.

Assessment and Escalation

Upon receipt of a concern, the Designated Safeguarding Lead (or Deputy) will assess the information available and determine appropriate next steps. This may include:

- Implementing protective or supervisory measures;
- Contacting parents or guardians where appropriate;
- Consulting with partner institutions in co-delivery arrangements;
- Referring the matter to relevant authorities in accordance with applicable law;
- Seeking professional advice where required.

Where a participant's conduct presents a safeguarding risk to themselves or others, the Organisation may implement protective measures including supervision restrictions, temporary suspension, or removal from the programme where necessary.

Safeguarding responses are proportionate to the nature, seriousness, and immediacy of the concern.

Mandatory Reporting and External Authorities

The Organisation complies with applicable mandatory reporting obligations in the jurisdictions in which it operates.

Where a safeguarding concern meets the threshold for referral to external authorities, the Designated Safeguarding Lead will ensure that appropriate notifications are made without undue delay.

The Organisation will cooperate fully with lawful investigations conducted by relevant authorities.

Parent and Guardian Communication

Where appropriate and consistent with safeguarding considerations, parents or guardians will be informed of safeguarding concerns involving their child.

In certain circumstances, including where informing a parent may increase risk to the participant, notification may be delayed or managed in consultation with relevant authorities.

Decisions regarding parent communication rest with the Designated Safeguarding Lead or delegated leadership.

On-Site Incident Response

During residential or in-person programmes, safeguarding incidents may require immediate on-site management.

Programme leadership must ensure that:

- Immediate safety is prioritised;
- The Designated Safeguarding Lead is informed without delay;
- Protective supervision measures are implemented as required;
- Incident details are documented accurately.

Operational leadership supports safeguarding decision-making but does not replace the authority of the Designated Safeguarding Lead.

Managing Allegations Against Staff or Volunteers

Allegations involving staff, contractors, volunteers, or other representatives of the Organisation must be treated with seriousness and urgency.

The Organisation recognises the need to protect participants from potential harm while also ensuring that individuals be treated fairly and in accordance with applicable law.

Immediate Protective Measures

Where an allegation or concern involves a member of staff or a representative of the Organisation, immediate protective steps may be implemented to safeguard participants. Such measures may include:

- Suspension from participant-facing duties;
- Adjustment of supervisory responsibilities;
- Increased oversight or supervision;
- Restriction of access to programme areas.

Protective measures are precautionary and do not constitute a presumption of wrongdoing.

Escalation and Assessment

All allegations against staff or volunteers must be reported immediately to the Designated Safeguarding Lead. The Designated Safeguarding Lead will:

- Assess the nature and seriousness of the allegation;
- Determine whether the matter meets the threshold for referral to external authorities;
- Implement appropriate interim protective measures;
- Ensure that the matter is documented appropriately.

Where required by law or safeguarding expectations, relevant authorities will be notified without undue delay.

Any safeguarding allegation or concern involving the Designated Safeguarding Lead must be reported directly to the Organisation's senior leadership or Legal & Compliance function through the designated safeguarding reporting channels.

Relevant safeguarding contact details and reporting pathways will be communicated to staff and participants prior to and during programme delivery, including alternative escalation routes where concerns involve safeguarding leadership.

Cooperation with Authorities

Where a matter is referred to external authorities, the Organisation will:

- Cooperate fully with lawful investigations;
- Preserve relevant documentation;
- Avoid actions that could compromise investigative processes.

Internal action may be paused where appropriate pending external investigation outcomes.

Fair Treatment and Confidentiality

The Organisation is committed to handling allegations in a manner that is fair and impartial, respectful of confidentiality, and compliant with applicable employment and data protection laws.

Information relating to allegations will be shared only on a need-to-know basis.

Support may be offered to both the reporting individual and the subject of the allegation, as appropriate.

Malicious or False Allegations

Allegations found to be deliberately false or malicious may result in appropriate action. However, no adverse action will be taken against an individual who raises a concern in good faith.

Records, Confidentiality, and Information Sharing

Safeguarding concerns, decisions, and actions must be documented accurately and retained securely.

Safeguarding Records

The Organisation maintains appropriate records of:

- Safeguarding concerns raised;
- Decisions made by safeguarding leadership;
- Protective measures implemented;
- Referrals to external authorities;
- Outcomes of investigations where applicable.

Records must be factual, proportionate, and contemporaneous. Safeguarding documentation should clearly record the sequence of events, the decisions made and their rationale, any consultation undertaken, and the actions implemented. Documentation must be sufficient to demonstrate that concerns were assessed and addressed appropriately.

Safeguarding records are maintained securely and are accessible only to authorised individuals, in compliance with relevant data protection legislation.

Confidentiality and Information Sharing

Safeguarding information is handled sensitively and shared only on a need-to-know basis. Information may be shared where necessary to:

- Protect a participant from harm;
- Comply with legal or regulatory obligations;
- Support appropriate safeguarding decision-making;
- Cooperate with lawful investigations.

Confidentiality does not override the obligation to act where a participant may be at risk.

Programme-Level Oversight

The Organisation reviews safeguarding incidents and trends at programme level in order to identify recurring risks, assess effectiveness of supervision arrangements, inform improvements to policy or training, and/or strengthen preventative measures.

Serious safeguarding incidents are escalated to organisational leadership as appropriate.

Training and Programme Preparation

Safeguarding competence is supported through structured preparation and training prior to programme delivery.

All staff, supervisors, tutors, and representatives engaged in participant-facing roles must complete safeguarding training appropriate to their responsibilities before programme commencement. Training must address:

- Recognition of safeguarding concerns;
- Reporting obligations;
- Professional boundaries;
- Residential and supervisory responsibilities;
- Emergency response expectations.

Where roles involve enhanced responsibilities — including residential supervision, travel leadership, laboratory oversight, or welfare support — additional role-specific briefing or training must be provided.

Programme leadership must ensure that safeguarding expectations are clearly communicated before participants arrive.

Ongoing Awareness

Safeguarding training and guidance may be refreshed periodically to reflect evolving legal, operational, or contextual risks.

Participation in required safeguarding training is a condition of programme engagement.

Policy Review and Governance

This policy is subject to regular review to ensure it remains effective, proportionate, and aligned with applicable legal and regulatory standards.

The Organisation will review this policy at least annually and following any serious safeguarding incident; or where legal or regulatory changes require amendment. Following serious safeguarding incidents, the Organisation may conduct internal review to assess the adequacy of supervision arrangements, the effectiveness of its response, and whether policy or training improvements are required.

Accountability

Ultimate accountability for safeguarding governance rests with organisational leadership.. The Designated Safeguarding Lead is responsible for oversight of policy implementation and recommending improvements where necessary.

Version Control

Policy No.:	APS-CS-01
Approval Date:	12 May 2026
Previous Review Date:	N/A
Next Review Date:	12 May 2027