

Under 18 Policy & Procedure

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Prepared for: QA group

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Public

This document can be disclosed outside of the QA group of companies without Director, InfoSec or Legal Team member approval.

Version control

This policy applies to all apprenticeships

Document information

Version 1.2	No changes.

Document Approval

Name	Position	Viewed / comments
Naomi Lavender	Quality Director	Approved

Revision History

Version	Issue date	Author	Description of change
1.0	July 2022	Steven Smith, Safeguarding Manager	New Policy.
1.1	July 2024	Steven Smith, Safeguarding Manager	Update & review – new branding. Changes to clarify consent form.
1.2	June 2025	Mark Soady, Head of Learner Services and DSL	Addition of section 11 Addition of appendix B

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1. Introduction

The policy sets out QA's intentions around the support and application of its services to under 18's. As a business that supports equal opportunities onto its programmes, QA would also enrol learners who are under 18. These learners and their families should be aware that our centres and classroom settings operate like an adult environment. Learners, like staff, are expected to behave as adults applying the necessary skills both in study and at work.

However, QA recognises that anyone under the age of 18 is legally a child therefore may have different needs with regards to their support and welfare. Staff across the business work jointly to ensure the wellbeing of students under 18 is maintained accordingly.

This policy will be reviewed annually and should be read by both Staff, learners under 18, parents, carers or guardians and employers. This policy should be read in conjunction with QA's Safeguarding and Prevent Policy and Procedure document.

2. Pre-onboarding and Quarterly Check-Ins

QA recognises that there are greater risks for younger workers when joining the workplace. These can be linked to less experience within work, type of employment or the existence of power balance that naturally may occur whilst at work. QA will complete a workplace risk matrix to capture those who might be at greater risk.

Staff completing the employer/learner risk matrix must send this to the customer service team to review. Where cases are deemed to be high risk, or the learner is under 18 this will be forwarded to the Safeguarding Team. As part of due diligence, the team will review whether the role and employment arrangements to be satisfactory before proceeding to onboarding.

Learners who are under 18 will have a welcome check in with a member of QA's Safeguarding Team before they start their course and will receive wellbeing check-ins on a quarterly basis. This will ensure that if you are an under 18 learner or parent, carer or guardians of a child, you are familiar with the wellbeing services available, offering the wrap around support which may be needed to succeed whilst on the apprenticeship.

Risk assessments will be stored by the Safeguarding Team.

3. Recording of Training

For staff seeking to record training, you must have legitimate reasons for a request of this type. For example, to support teaching and learning for the learner or another who has additional learning needs. A request to record approval must be granted and signed off by an appropriate Director.

Learners who are under 18 at sign up will be asked to give their consent to being recorded during training.

For young people over 16 years old, consent can be obtained directly without the need of a parent, carer or guardian.

Recordings must not proceed without written consent and approval.

The management and stipulations of data relating to recordings will be followed in line with UKGDPR and Data Protection 2018 legislation. It is always good practice to give notice to

those who will be recorded, in which case the requester must inform those who will be impacted.

Confirmation to record will be sought during the safeguarding welcome check in, using the Under 18's consent to record form

4. Next of Kin (Emergency Contact)

It is particularly important that emergency contact details are provided for students under the age of 18 and such students and/or their parents, carers or guardians are required to supply this information upon signup with QA. Learners under 18 will not be allowed to enrol on their course unless this information is provided.

5. Child Protection/Safeguarding

As a matter of law, a person under the age of 18 years is a child. QA has a responsibility to protect those under the age of 18 years from abuse and is obliged to report any suspicions or allegations of abuse of children to the appropriate Children's Social Care service. Any such suspicions or allegations will be reported to QA'S Designated Safeguarding Lead, who will contact the appropriate authorities. QA's Safeguarding Policy and Procedure outlines the overall approach to the management of concerns.

6.Prevent - Radicalisation and Extremism

QA recognises the positive contribution it can make towards protecting its learners from radicalisation to violent extremism and is committed to fulfilling its duties under the Prevent Duty Guidance. QA will empower its learners to create communities that are resilient to extremism and to protect the wellbeing of particular learners who may be at risk of being drawn into violent extremism or crime.

Radicalisation is the process by which individuals come to support terrorism or violent extremism. It is recognised that radicalisation can occur to an individual from any section of society and is not particular to any racial, ethnic or social group. It is further recognised that in many instances the process of radicalisation is essentially one of grooming by others.

Possible behaviour indicators are below:

- Discriminatory language or actions towards specific groups or people with a particular protected characteristic
- Possession or sharing of violent extremist literature
- Showing or sharing online material of an extreme nature to others
- Behavioural changes (for example, becoming withdrawn)
- Expression of extremist views
- Advocating violent actions and means
- Association with known extremists
- Seeking to recruit others to an extremist ideology

In respect of safeguarding individuals from radicalisation, QA works to the Prevent element of the Government's Counter Terrorism Strategy, and where deemed appropriate seeks external support for learners through referrals to the Channel Programme. This programme aims to work with the individual to address their specific vulnerabilities, prevent them becoming

further radicalised and possibly entering the criminal justice system because of their actions. More information can be found within the Channel Duty Guidance document available at <https://www.gov.uk/government/publications/channel-guidance>.

If you have concerns, contact the relevant Designated Safeguarding Lead.

To ensure all staff awareness related to Prevent is as effective as possible, staff should be encouraged to complete or engage with the following on a regular basis:

- [Managing risk of radicalisation in your education setting](#)
- [Prevent duty training: Learn how to support people susceptible to radicalisation](#)
- [Educate against hate](#)
- [Education and Training Foundation – Safeguarding and Prevent](#)

7. Relationship with Staff

Under the Sexual Offences (Amendment) Act 2000, it is a criminal offence for any person in a position of trust (which may include members of QA staff) to engage in sexual activity with someone who is under 18 years. All staff receive training on appropriate behaviours when working with young or vulnerable learners. Staff are also made aware of particular risks to young people through ongoing training and support. Prior to contacting a learner, staff will identify if the learners age falls under 18. This will include relevant stakeholders. The safeguarding team will maintain a list of under 18's and will reach out to staff who have access to the learner. If so, they will take extra considerations when engaging in a 1 to 1 capacity.

Staff will always consider their professionalism when it comes to providing appropriate Information Advice & Guidance. This includes casual conversations and the risk of promoting unhelpful behaviours. As staff who work with under 18's there is the responsibility to think about language and presenting themes that may not be suited in a 1 to 1 setting. Staff will utilise official channels to minimise both risk of abuse and false accusations. Where appropriate QA may request that both parties (learner & staff) report of no issues on conclusion of visits or interventions.

8. Health

In rare instances, consent for emergency medical treatment may be required before parents, carers or guardians can be contacted. QA therefore requires parents, carers or guardians to give their consent that, in the case of such an emergency, a senior member of QA has permission to act on medical advice and do what is in the best interests of the child.

9. Parental, Carer or Guardian Involvement

It is QA's usual policy to deal with students and not with parents, carers or guardians; this approach will also apply to students who are under the age of 18 years. Although those under 18 are regarded as children under UK law, they still have the legal right under the Data Protection Act (1998) for information about them not to be disclosed without their explicit consent. This means that the QA is not able to give information to parents, carers or guardians regarding the student's progress, results or any other personal circumstance unless the student has given specific consent. QA will therefore correspond with students, not parents, carers or guardians.

10. Looked After Care

Children who are from looked after care potentially face greater challenges. As such, those who join QA's programmes and have disclosed, should expect to share details of the local authority Personal Advisor appointed to guide and support them, to liaise with them as necessary regarding any issues of concern affecting the care leaver. Those who are from looked after care will automatically be offered and assigned a Safeguarding specialist through the duration of their apprenticeship. The safeguarding specialist will be set up with the consent of the learner a support and disclosure meeting with the learners' employer, agreeing on a necessary plan of action. Interventions via the Safeguarding team once established will commence monthly.

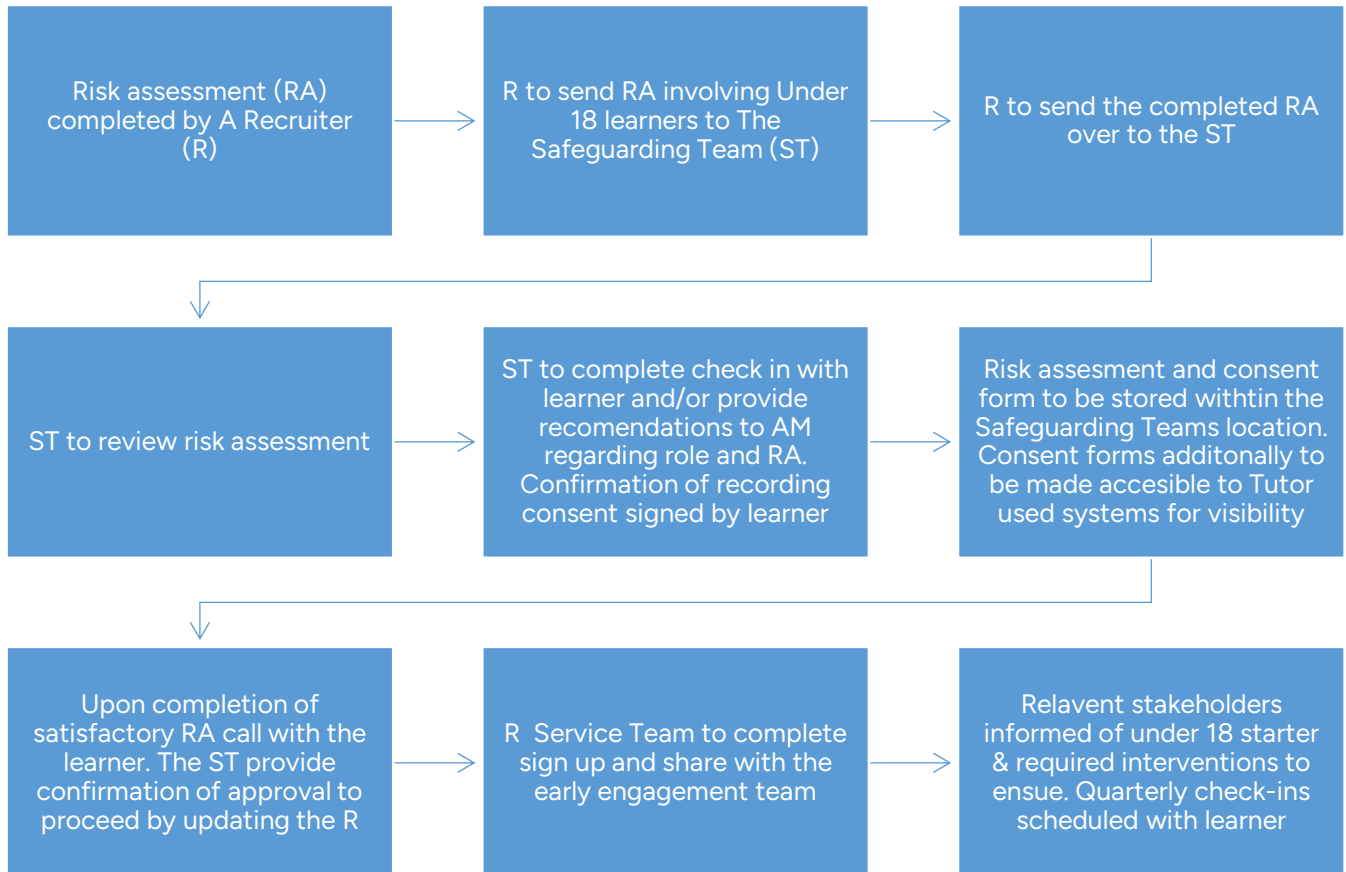
11. How to Make a Referral

Our referral process has been designed to ensure all stakeholders are able to submit a referral in a structured manner, enabling the Safeguarding Team to provide timely and effective support.

- [Safeguarding Referral Form \(Staff/Employers/Peer\)](#) – This form affords staff, employers, and even fellow apprentices the opportunity to raise a safeguarding concern about an apprentice.
- [Safeguarding Self-Referral \(Apprentices\)](#) – This form will allow an apprentice to raise a concern about themselves.
- [Low-Level and Behavioural Safeguarding Concern](#) – This form serves 2 purposes.
 - It gives all parties an opportunity to raise concerns regarding the conduct of QA staff towards apprentices.
 - It allows all parties to highlight concerning behaviour from all parties that may not be a safeguarding concern but could be interpreted as more of a behavioural concern. For example, where a person uses misogynistic language or a microaggression of some kind. This allows us to build a picture and to take a proactive approach.

Call 07552597253 for urgent safeguarding support or 999 in case of emergency.

Appendix A: Onboarding Process Flow



Appendix B: The Safeguarding Team

The Safeguarding Team



Mark Soady

Designated Safeguarding Lead (DSL) & Apprenticeship Head of Learner Services.



Clare Stuart

Deputy DSL and Safeguarding Team Leader



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Policy Review

Review of policy- The QA Under 18 Policy and Procedure will be reviewed annually by the Head of Learner Services and the QA People Team.

Access- The policy will be published on the QA Intranet, company website and learner and employer portals.

Next Review Date: June 2026

