



Safeguarding and Welfare Policy

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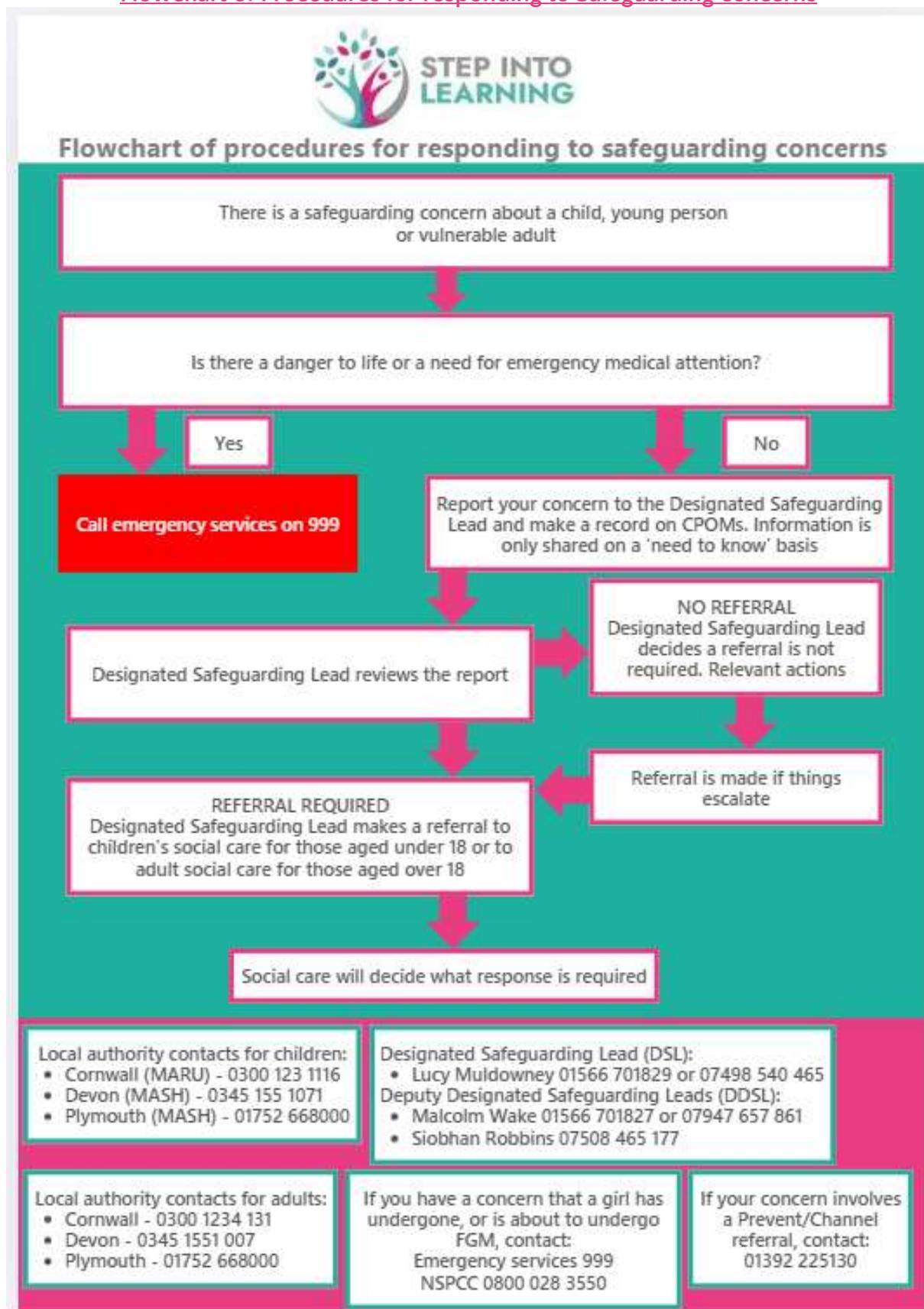
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Flowchart of Procedures for responding to Safeguarding concerns



1. Purpose of Policy

1.1 The purpose of this policy is to make a statement of intent and commitment to action on the part of Step Into Learning in relation to the child protection and safeguarding aspects of its duty to safeguard and promote the welfare of all learners including children, young people and at-risk adults. To this end, it is intended to:

- ensure action that will contribute to the safeguarding of all learners
- raise awareness of the need to safeguard and protect all learners including children, young people and at adults and that everyone has a responsibility for safeguarding
- indicate what action is to be taken when there is a safeguarding concern.
- ensure compliance with statutory guidance including Keeping Children Safe in Education 2025, Working Together to Safeguard Children 2023 and relevant post-16 safeguarding legislation.

1.2 This policy supersedes all existing safeguarding and child protection policies. This policy is available on the Step Into Learning website and is available to all staff via the Policies pages on SharePoint.

1.3 Safeguarding is not just about protecting learners from deliberate harm, it relates to all forms of abuse including: (this is not a definitive list)

- neglect
- physical abuse
- sexual abuse
- emotional abuse
- bullying, including online bullying and prejudice-based bullying
- racist, disability and homophobic or transphobic abuse
- gender-based violence/violence against women and girls
- serious youth violence, particularly affecting children and young adults who have been excluded, have experienced trauma and have been involved in offending
- so-called honour-based violence
- domestic abuse
- sexual harassment and online sexual abuse between children and learners. Online abuse can include sending abusive, harassing and misogynistic messages; sharing nude and semi-nude images and videos; and coercing others to make and share sexual imagery
- sexual violence between children and learners
- upskirting (taking a picture of someone's genitals or buttocks under their clothing without them knowing, either for sexual gratification or in order to humiliate or distress the individual. It is a criminal offence)
- child sexual exploitation and trafficking
- child criminal exploitation, including county lines
- radicalisation and/or extremist behaviour
- risks linked to using technology and social media, including online bullying; the risks of being groomed online for exploitation or radicalisation; and risks of accessing and generating inappropriate content, for example youth produced sexual imagery
- teenage relationship abuse
- substance misuse
- female genital mutilation
- forced marriage
- fabricated or induced illness
- homelessness
- risks relating to misinformation, disinformation and harmful or misleading online content

- other issues not listed here but that pose a risk to children, learners and adults

1.4 Step Into Learning also recognises its responsibility under wider safeguarding to ensure that all learners benefit from support from external services where appropriate. All staff must be particularly alert to the potential need for additional support for anyone who:

- is disabled and has specific additional needs
- has special educational needs (whether, or not they have a statutory Education, Health and Care Plan)
- is a young carer
- Is at risk of so called 'honour' based abuse such as Female Genital Mutilation or forced marriage
- has a family member in prison or is affected by parental offending
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised criminal groups (contextualised safeguarding)
- is frequently missing/goes missing from care, home, education (inc. part school days)
- is at risk of modern slavery, trafficking or criminal exploitation
- is at risk of being radicalised and drawn into violent extremism or terrorism
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing drugs or alcohol themselves
- has returned home to their family from care
- is a privately fostered child
- is absent from education, including persistent or unexplained absence or reduced timetables
- is experiencing mental health difficulties that may place them at risk of harm, exploitation or self-neglect

1.5 Step into Learning takes seriously its responsibility to safeguard and protect the welfare of all learners in its care. It has a moral duty and statutory obligation under Section 175 of the Education Act 2002 to all children and young people under 18 years of age and at-risk adults (under the safeguarding at risk groups act 2006) and must have regard to Keeping Children Safe in Education 2025 statutory guidance.

1.6 For the purpose of Safeguarding and Child Protection, this policy covers:

- All children and young people under 18 of age enrolled on full and part-time courses.
- Adult learners including at-risk adults enrolled on full and part-time courses.
- Visitors to Step Into Learning (under 18)
- Employees, apprentices, work experience learners or volunteers who are under 18 years of age
- learners attending provision delivered through subcontracted or partner organisations where Step Into Learning retains safeguarding responsibility

1.7 For the purpose of Safeguarding At risk Adults, the following are included:

- All learners classed as adults over the age of 18 years (An adult at risk is defined by the Care Act 2014, as 'a person aged 18 years or over, is at risk is who: has care and support needs. is experiencing, or is at risk of, abuse or neglect. as a result of their care and support needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

This definition aligns with statutory duties under the Care Act 2014.

1.8 Step into Learning also works with other agencies to protect children under the Children Act 2004 and Working Together to Safeguard Children 2023. This duty is to:

- safeguard and promote the welfare of children, young people and at-risk adults
- work to provide an environment in which children, young people and at-risk adults feel safe, secure, valued and respected, and feel confident that any complaint, allegation or suspicion of abuse will be taken seriously
- ensure that there are adequate procedures and arrangements to identify, assess, make referrals and support children, young people and at-risk adults who are suffering from harm.
- work in partnership with parents and other agencies (e.g. Schools, Police, Social Care) to meet these obligations.
- comply with local multi-agency safeguarding arrangements and information-sharing protocols
- maintain a safe environment for all.

1.9 The statutory guidance Working Together to Safeguarding Children 2023 covers the legislative requirements and expectations on individual services to safeguard and promote the welfare of children and young people.

https://assets.publishing.service.gov.uk/media/669e7501ab418ab055592a7b/Working_together_to_safeguard_children_2023.pdf

1.10 This policy has been developed in accordance with the principles established by the Children Act 2004 and in line with the following government publications¹:

- 'Working Together to Safeguard Children' 2023
https://assets.publishing.service.gov.uk/media/669e7501ab418ab055592a7b/Working_together_to_safeguard_children_2023.pdf
- Keeping Children Safe in Education
https://assets.publishing.service.gov.uk/media/68add931969253904d155860/Keeping_children_safe_in_education_from_1_September_2025.pdf
- Cornwall Council Child Protection and Safeguarding Procedures
<https://www.cornwall.gov.uk/health-and-social-care/childrens-services/child-protection-and-safeguarding/>
- Multi Agency Practice Guidelines : Female Genital Mutilation, July 2020
https://assets.publishing.service.gov.uk/media/613f26d5e90e07044435c949/6.7166_HO_FBIS_BN_O_Leaflet_A4_FINAL_080321_WEB.pdf
- Cornwall Council Safeguarding Adults guidance
<https://www.cornwall.gov.uk/health-and-social-care/adult-social-care/safeguarding-adults/>
- HM Government Prevent Duty Guidance for Further Education England and Wales, 2023
<https://www.gov.uk/government/publications/prevent-duty-guidance/prevent-duty-guidance-for-england-and-wales-accessible>
- HM Criminal Exploitation/ County
<https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-at-risk-adults-county-lines/criminal-exploitation-of-children-and-at-risk-adults-county-lines>
- Prevent duty 2023 <https://www.gov.uk/government/publications/prevent-duty-guidance>
- Care Act 2014 <https://www.legislation.gov.uk/ukpga/2014/23/contents>

1.11 Safeguarding Statement

1.11.1 Safeguarding is not just about protecting children, young people and at-risk adults from deliberate harm. It includes issues such as learner health and safety; bullying; racist or homophobic abuse; or any form of harassment including sexual harassment or violence and discrimination; meeting the needs of learners with medical conditions; providing first aid; drug and substance misuse; educational and off site visits; intimate care; internet safety; issues which may be specific to a local area or population, for example gang activity, cybercrime, serious violence, modern day slavery, Child Criminal Exploitation (CCE), Child Sexual Exploitation (CSE), Female Genital Mutilation (FGM), radicalisation for violent extremism, site security, security, safer recruitment and employment practices.

1.11.2 Step Into Learning recognises the moral and statutory responsibility to safeguard and promote the welfare of all learners including children, young people and at-risk adults. We work hard to provide a safe and welcoming environment where young people and adults are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that all learners receive effective support, protection and justice. All staff have a full and active part to play in protecting children, young people and adults including at risk adults, from harm and that learner welfare is our paramount concern.

2. Definitions

The definition of safeguarding and promoting the welfare of learners has changed so it's now in-line with the definition in [Working Together to Safeguard Children](#). The new definition of **safeguarding and promoting the welfare of children** is:

- Providing help and support to meet the needs of young people as soon as problems emerge.
- Protecting young people from maltreatment, whether that is within or outside the home, including online.
- Preventing impairment of young person's mental and physical health or development.
- Ensuring that young people grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all young people to have the best outcomes
- There are further definitions that we recognise as follows:
- Child Protection refers to the processes undertaken to protect children who have been identified as suffering or being at risk of suffering significant harm.
- Designated Safeguarding Lead (DSL) is the first point of contact for any member of the staff who has a concern about the safety and wellbeing of a child, young person or at-risk adult.
- Deputy Designated Safeguarding Lead (DDSL) the deputy is the first point of contact in the absence of the DSL to avoid any unnecessary delays in responding to a child/young person's/at risk adult's need.
- Prevent refers to the Government's strategy to prevent young people and adults including at risk adults becoming radicalised.
- Prevent Single Point of Contact is the person identified in Step Into Learning as the point of contact for all prevent related incidents and concerns.
- Safeguarding Team refers to the team of Level 4 safeguarding trained staff who support the DSL and DDSL in safeguarding and child protection.
- Abuse refers to a form of maltreatment of a learner. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Learners may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Adults and children may be abused by any adult or adults or by another child or children.

- For learners aged 18 and over, safeguarding duties are aligned with adult safeguarding principles under the Care Act 2014.

3 Policy

3.1 Step Into Learning's policy and procedures for safeguarding children, young people and adults including at risk adults will be in line with Cornwall Council Child Protection and Safeguarding procedures, Cornwall Council Safeguarding Adults procedures, Keeping Children Safe in Education and Working Together to Safeguard Children 2023 and the Education and Training (Welfare of Children) Act 2021 where applicable to post-16 providers.

3.2 Step into Learning Lead safeguarding trustee in collaboration with DSL will ensure that the Trustees and Senior Management Team understand and fulfils its safeguarding responsibilities and recognises that it plays an important part of the wider safeguarding system for adults, children and young people, as described in the statutory guidance Working Together to Safeguard Children 2023.

3.3 There is a team of staff who will act as the Step Into Learning Safeguarding Team. These team members will have all undertaken Level 4 safeguarding training or training appropriate to their role, refreshed in line with statutory guidance and local safeguarding arrangements.

3.4 Policy Principals

- The welfare of the child, young person, at-risk adult is paramount.
- Safeguarding is everyone's responsibility.
- All children, young people and at-risk adults, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
- All staff have an equal responsibility to act on any suspicion, concern or disclosure that may suggest a child is at risk of harm.
- Learners and staff involved in child protection issues will receive appropriate support.
- All staff members are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. A zero tolerance to any form of abuse is adopted within Step Into Learning.
- When concerned about the welfare of a young person or at-risk adult, staff members should always act in the interests of the child, young person/at risk adult.
- Safeguarding practice is child-centred and takes account of learners' wishes and feelings.

3.5 Policy Aims

This Policy aims to:

- To promote an environment in which all learners feel safe, secure, valued and respected, and feel confident to, and know how to approach staff if they are in difficulty, believing they will be effectively listened to.
- Provide all staff with the necessary information to enable them to meet their child protection and safeguarding responsibilities; remembering that "Safeguarding is everyone's responsibility"
- To ensure that all staff who have substantial access to children and young people, have been checked as to their suitability, including verification of their identity, qualifications, and a satisfactory DBS check (according to guidance in KCSiE) and a single central record is kept for audit purposes.

3.6 Step Into Learning recognises that it is an agent of referral and not of investigation. It is not Step Into Learning's responsibility to investigate abuse. Staff should not extend an offer of

confidentiality but should clearly inform the person that if information about abuse is disclosed there is a duty on staff to follow Safeguarding reporting procedures.

4 Roles and Responsibilities

4.1 We understand that our responsibility to safeguard children, young people and adults including at-risk adults requires that we appropriately share any concerns that we may have about them with our multi agency partners, in line with the statutory guidance in 'Working Together to Safeguard Children 2023 and 'Keeping Children Safe in Education 2025'.

4.2 Step Into Learning has a DSL and a DDSL supported by a Safeguarding team, who are responsible for the monitoring of child protection and safeguarding of learners. They act as a focal point for staff to discuss concerns and liaise with other agencies and professionals.

4.3 Key Staff

| Key Staff | |
|---|---|
| The Senior Designated person for Safeguarding and Child Protection (DSL) is: | Lucy Muldowney |
| Email: lucy.muldowney@stepintolearning.org.uk | Tel: 01566 701829 |
| The Deputy Designated Persons (DDSLs) are: | Malcolm Wake Siobhan Robbins |
| Email: Malcolm.Wake@stepintolearning.org.uk Siobhan.Robbins@stepintolearning.org.uk | Tel: 01566701827 Tel: 07508 465177 |
| The Single Point of Contact (SPOC) for Prevent is: | Lucy Muldowney |
| Designated Person for looked after young people and previously looked after young people is: | Lucy Muldowney |
| The nominated Trustee for Child Protection and Safeguarding is: | Vickie Bishop Vickie.Bishop@stepintolearning.org.uk |
| The nominated Trustee for Prevent is: | Vickie Bishop Vickie.Bishop@stepintolearning.org.uk |

4.4 The Role of the Designated Safeguarding Lead

The DSL will be appropriately trained, and this training will be regularly updated in line with statutory guidance, to carry out those functions necessary to ensure the ongoing safety and protection of young people and adults including at-risk adults. In the event of the long-term absence of the designated safeguarding lead, the deputy will assume all the functions below. The Designated Safeguarding Lead:

- holds ultimate responsibility for safeguarding and child protection in Step Into Learning.
- acts as a source of support and expertise in carrying out safeguarding duties for Step Into Learning.
- is appropriately trained and has regular updates to their training and will refresh their knowledge and skills at regular intervals but at least annually.
- will refer cases where a crime may have been committed to the Police as required.

- will keep detailed, accurate records, either written or using appropriate online software (CPOMs), of all concerns about a child/young person/adult/at risk adult even if there is no need to make an immediate referral.
- will act as a point of contact with safeguarding partners.
- will liaise with the Senior Management Team to inform them of issues or ongoing enquiries and police investigations.
- act as a source of support, advice and expertise for all staff.
- will ensure that either they, or another staff member, attend case conferences, core groups, or other multi-agency planning meetings, contribute to assessments, and provide a report where required which has been shared with the parents.
- will ensure that any learner currently with a child protection plan who is absent in the educational setting without explanation for two days is referred to the Cornwall Multi Agency Referral Unit
- will ensure that all staff sign to say they have read, understood and agree to work within Step Into Learning's Safeguarding and Welfare policy, staff code of conduct and Keeping Children Safe in Education Part 1 and ensure that the policies are used appropriately
- will understand and support Step into Learning with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- will refer cases to the Channel programme where there is a radicalisation concern as required; and support staff who make referrals to the Channel programme will organise child protection and safeguarding training, regularly updated training and a minimum of annual updates for staff.
- understands locally agreed processes for providing early help and intervention and will support members of staff where Early Help is appropriate.
- will ensure the Safeguarding and Welfare policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the trustees
- ensure the Safeguarding and Child Welfare policy is available publicly and parents know referrals about suspected abuse or neglect may be made and the role of the Step Into Learning in this
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements
- will ensure staff understand the distinction between safeguarding concerns, low-level concerns and allegations that meet the harm threshold
- will ensure appropriate action is taken where learners are missing from education
- will ensure filtering and monitoring arrangements are reviewed regularly.

4.5 The Role of the Trustees

4.5.1 The Trustees ensure that:

- Step Into Learning appoints a DSL for Safeguarding and Child Protection who is a member of the leadership team and who has undertaken training in inter-agency working, in addition to basic child protection training
- they have strategic leadership responsibility for safeguarding arrangements
- they provide scrutiny and challenge to ensure that safeguarding processes and education are of the highest quality.
- the DSL role is explicit in the role holder's job description
- Step Into Learning has a Safeguarding and Welfare policy and relevant procedures in place, including a staff code of conduct, that is consistent with statutory requirements, reviewed annually and made available publicly on Step into Learning's website or by other means

- Step Into Learning has procedures for dealing with allegations of abuse made against members of staff including allegations made against members of the Leadership Team, Chair of Trustees or another trustees and allegations against other young people
- Trustees understand their role in oversight of low-level concerns
- Step Into Learning follows safer recruitment procedures that include statutory checks on staff suitability to work with children and disqualification by association regulations
- the DSL receives refresher training at least every two years, with regular interim updates
- all staff, including temporary staff and volunteers are provided with access to the Safeguarding and Welfare policy and staff code of conduct and KCSiE Part 1
- Step Into Learning contributes to Early Help arrangements and inter agency working
- Learners will be taught about safeguarding, including radicalisation and digital safety as part of a broad and balanced curriculum.
- they undertake an annual safeguarding “deep dive” to provide robust scrutiny of safeguarding practice, evaluate compliance with statutory requirements, and ensure continuous improvement
- safeguarding is a standing agenda item at Trustee meetings, with updates provided as necessary to ensure appropriate oversight of emerging issues and low-level concerns

4.5.2 The Trustees will nominate a member to be responsible for liaising with the local authority and other agencies in the event of an allegation being made against a member of the Leadership Team.

4.5.3 It is the responsibility of the Trustees to ensure that the safeguarding, recruitment and managing allegations procedures take into account the procedures and practice of the local authority and national guidance.

4.6 The Role of the Step into Learning Leadership Team

Keeping Children Safe in Education states that teachers, including leaders and managers should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties. To this end the Leadership Team will:

- ensure that the Safeguarding and Welfare policy and procedures are implemented and followed by all staff
- provide regular safeguarding reports and updates to Trustees

4.7 The Role of all staff

4.7.1 Safeguarding is everyone's responsibility. Everyone who comes into contact with learners, including at risk adults, children, young people and their families has a role to play in safeguarding. Education staff are particularly important as they can identify concerns early and provide help for all learners, preventing concerns from escalating. Tutors and learning support staff must safeguard children, young people and adults including at risk adult's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

4.7.2 All Step Into Learning staff should identify children and at-risk adults that may benefit from support from external services, especially 'Early Help'. In the first instance staff should record their concerns on CPOMs, and then discuss requirements with the designated safeguarding lead. Staff may be required to support other agencies and professionals in their assessments. Staff must always follow up concerns if they believe appropriate action has not been taken.

4.7.4 The 'Staff Code of Conduct' All staff will be made aware of the Step Into Learning Staff Code of Conduct at induction, and all are required to sign this. This is contained within the Employee Handbook.

4.7.6 Staff must familiarise themselves with the Step Into Learning Whistle blowing policy, which is contained within the Employee Handbook, and know what to do where there are concerns about the behaviour of member of staff.

4.7.7 If a safeguarding concern involves a member of the safeguarding team, staff should not report this on CPOMs. Instead, a safeguarding incident report form ([Safeguarding Incident Report Form V1.0.docx](#)) should be completed and submitted to the investigating officer (DSL/DDSL – whomever is not involved in the concern). If both the DSL and DDSL are involved in the concern, then the incident should be escalated to the trustee who holds responsibility for safeguarding. Advice may be sought via the Local Authority and LADO at any time, for advice and support. Ongoing delegation of DSL/DDSL duties should be discussed with the Executive Director.

4.7.8 All concerns of poor practice, low level concerns or possible abuse by colleagues (including supply staff, volunteers, contractors or an organisation or individual using the premises) should be reported to the DSL or Executive Director of Business Services. The term 'low-level' concern does not mean that it is insignificant. All low-level concerns will be recorded, reviewed and retained in line with KCSIE guidance.

If staff have a safeguarding concern or an allegation about another member of staff (including supply staff, volunteers, contractors or an organisation or individual using the premises) that does not meet the harm threshold, then this should be shared in accordance with the safeguarding policy. Concerns about the Leadership Team should be reported to the Chair of Trustees.

4.8 Allegations against staff

4.8.1 When a safeguarding allegation is made against a member of staff (including supply staff, volunteers, contractors or an organisation or individual using the premises), our set procedures must be followed, allegations will be reported as appropriate to the Local Authority Designated Officer (LADO) and/or police. The full procedures for dealing with allegations against staff can be found in Keeping Children Safe in Education.

4.8.3 The Executive Director, on all such occasions will discuss the content of the allegation with the DSL and if necessary, the Local Authority Designated Officer for Child Protection, in line with Statutory guidance in Keeping Children Safe in Education.

4.8.6 Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. In some cases, staff may be suspended without prejudice where this is deemed to be the best way to ensure that young people are protected. Alternatives to suspension will always be considered. In the event of suspension.

Supporting Staff Through Safeguarding Allegations:

Act Fairly, Calmly and Without Assumption

- Treat all safeguarding allegations seriously, sensitively, and impartially.
- Make it clear that an allegation does not imply guilt.
- Avoid speculation, gossip, or informal discussion.
- Follow agreed procedures consistently to protect children, staff, and the organisation.

4.8.9 Complaints which escalate into a safeguarding concern will automatically be managed under the safeguarding procedures.

4.9 Staff training

4.9.1 It is important that all staff receive training to enable them to recognise the possible signs of abuse, neglect and exploitation and to know what to do if they have a concern. This training will then be updated regularly, and all staff will receive updates at least annually.

4.9.2 New staff and Trustees will complete ETF Safeguarding & Prevent training as part of their induction and will be sent a link to Keeping Children Safe in Education Part 1, the Safeguarding and Welfare policy and Staff Code of Conduct. The training for trustees includes a specific safeguarding for governance module. All staff, including the DSL, Leadership Team and trustees will receive training that is regularly updated. All staff will also receive safeguarding updates via the safeguarding team termly newsletter, email, e-bulletins, website access and staff meetings throughout the year.

4.10 Abuse of Positions of Trust

4.10.1 All staff are aware that inappropriate behaviour towards learners is unacceptable and that their conduct towards learners must be beyond reproach. This is emphasised in the Safeguarding training received by all staff and in the 'Staff Code of Conduct'.

5 Safer Recruitment

5.1 Step Into Learning complies with the requirements of Keeping Children Safe in Education (including online searches as part of due diligence, in line with Keeping Children Safe in Education) and The Cornwall Council Child Protection procedures by carrying out the required checks and verifying the applicant's identity, qualifications and work history. The Step Into Learning Staff Recruitment procedures set out the process in full. At least one member of each recruitment panel will have attended safer recruitment training.

5.2 Step Into Learning obtains written confirmation from supply agencies or third-party organisations that agency staff or other individuals have been appropriately checked. Step Into Learning maintains a single central record of recruitment checks undertaken.

5.3 Volunteers, including Trustees will undergo checks commensurate with their work within Step Into Learning, their contact with learners and the supervision provided to them. Under no circumstances must a volunteer who has not been appropriately checked be left unsupervised.

6 Site Security

6.1 All visitors, including contractors, are asked to sign in and are given a visitors' badge, which confirms they have permission to be on site. Parents who are simply delivering or collecting their young person from reception or car parks do not need to sign in, unless they are going into buildings.

6.2 All visitors are expected to observe the Step Into Learning safeguarding and health and safety regulations.

7 Photography and images

7.1 The majority of people who take or view photographs or videos of learners including children and young people do so for entirely innocent and legitimate reasons. Learners will sign that they agree to have photographs to be taken and how they want their images to be shared, i.e., either internally for assessment or externally for marketing purposes. Students have a right at any time to withdraw this consent. Parental consent will be obtained for learners under 18 where required.

8 Off Site Activities

8.1 All extended and off-site activities must be subject to a risk assessment to satisfy health and safety and safeguarding requirements.

8.2 When our learners attend off-site activities, including work-related activities, we will check that effective safeguarding arrangements are in place in line with our policy.

9. Safeguarding Procedures

Recognising Abuse

9.1. Due to their day-to-day contact with learners, staff are uniquely placed to observe changes in learner behaviour and the outward signs of abuse. Learners may also turn to a trusted staff member when they are in distress or at risk. It is vital that all staff are alert to the signs of abuse and understand the procedures for reporting their concerns. Step Into Learning will always act on identified concerns.

It is also imperative that staff understand that a learner may not be able or ready to disclose abuse and are confident in recognising the possible signs and symptoms of abuse, reporting all concerns.

9.2 The indicators of abuse are outlined in Keeping Children Safe in Education. Staff must be aware of these and report their concerns using CPOMS. Outside of “**Professional Curiosity**”, it is not their responsibility to investigate or decide whether a student has been abused. Staff should exercise professional curiosity and record factual observations only, not opinions.

9.3 Taking Action

Key points for staff to remember for taking action are:

- in an emergency take the action necessary to help the learner, if necessary, call 999
- report your concern as soon as possible to the safeguarding team using CPOMS, by the end of the day
- outside of “Professional Curiosity” do not start your own investigation
- share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family
- seek support for yourself if you are distressed.

9.4 What to do if someone discloses abuse

The NSPCC has produced the following guidance:

- Listen carefully to what they're saying
Be patient and focus on what you're being told. Try not to express your own views and feelings. If you appear shocked or as if you don't believe them, it could make them stop talking and take back what they've said.
- Let them know they've done the right thing by telling you
Reassurance can make a big impact. If they've kept the abuse a secret it can have a big impact knowing they've shared what's happened.
- Tell them it's not their fault
Abuse is never a child's/young person's fault. It's important they hear, and know, this.
- Say you'll take them seriously
They may have kept the abuse secret because they were scared, they wouldn't be believed. Make sure they know they can trust you and you'll listen and support them.
- Explain what you'll do next. Explain you'll need to report the abuse to someone who can help.

- Avoid leading questions
- Report what the child/young person has told you as soon as possible. Enter your recollection on to CPOMs as soon after you've been told about the abuse so the details are fresh in your mind and action can be taken quickly. Report facts not assumptions.

9.5 Information sharing is essential for effective safeguarding and promoting the welfare of children, young people and at-risk adults. It is a key factor identified in many serious case reviews (SCRs), where poor information sharing has resulted in missed opportunities to take action that keeps children and young people safe.

The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children, young people and at-risk adults safe.

9.6 All safeguarding information, including learners' chronologies, will be held securely on CPOMS.

9.7 The DSL will normally obtain consent from the learner and/or parents to share sensitive information within Step Into Learning or with outside agencies. Where there is good reason to do so, the DSL may share information without consent, and will record the reason for not obtaining consent.

9.8 Reporting in the absence of DSL/DDSL

If the DSL and DDSL are not available and unsuccessful attempts have been made to contact both, staff will follow this procedure:

- If there is an immediate risk to life, call 999 or 101 for support from the emergency services.
- For non-emergency scenarios, but where immediate advice and support is required, contact the Local Authority (contact details can be found on SIL the Safeguarding webpage): <https://stepintolearning.org.uk/safeguarding/>
- Log the incident on CPOMs as soon as possible after the incident
- Handover to the DSL/DDSL once they are contactable

10 Prevent, Radicalisation and Extremism

Extremism can be defined., as the vocal or active opposition to fundamental British values. **Radicalisation** is the process of a person legitimising support for, or use of, terrorist violence.

Terrorism, is the use or threat of serious violence designed to influence the government or to intimidate the public for the purpose of advancing a political, religious, racial or ideological cause.

10.1 The threat to the UK from extremism, such as international terrorism, is substantial. The safeguarding threats that we now face is more diverse than ever before, dispersed across a wider geographical, social, technological and cultural platform.

We have a zero tolerance of extremist ideologies and behaviour. The organisation ensures that our care, guidance and curriculum empower learners to reject violent or extremist behaviour and to be safeguarded through education.

10.2 The Prevent Duty –The DSL is the designated Single Point of Contact (SPOC) for the Step Into Learning in matters relating to Prevent. Working with the Leadership Team, the Safeguarding team and the Trustee with Responsibility for Safeguarding, the DSL will ensure that Step Into Learning is compliant with its specified duty, as laid down in the Government's Counter Terrorism and Security Act 2015 and the HM Government Prevent Guidance for England and Wales 2023. The DSL, DDSL, the Safeguarding team and Safeguarding Trustee have all received training on our duties under Prevent and on how to recognise, refer and support learners who are at risk from, or who are being radicalised including risks associated with online radicalisation and mixed, unclear or unstable ideologies.

11 Looked After Children; Care Leavers

11.1 The most common reason for children becoming looked after is because of abuse or neglect. Staff have the necessary skills and understanding to keep looked after children safe. Appropriate staff have information about a child's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child.

12 Children, young people and at-risk adults who may be particularly at risk to abuse

12.1 Some children and young people may have an increased risk of abuse. It is important to understand that this increase in risk is due more to societal attitudes and assumptions or child protection procedures that fail to acknowledge children's/young person's diverse circumstances, rather than the individual child's personality, impairment or circumstances.

12.2 Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur. To ensure that all our learners receive equal protection, we will give special consideration to children, young people and at-risk adults who are:

- disabled or have special educational needs
- young carers
- living in a domestic abuse situation
- have a parent in prison
- have a parent with mental health issues
- at risk of 'honour' based violence
- affected by parental substance misuse, domestic violence or parental mental-health needs
- asylum seekers
- living away from home
- at risk to being bullied, or engaging in bullying
- living in temporary accommodation
- living a transient lifestyle
- living in chaotic and unsupportive home situations
- at risk to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality

- at risk of sexual exploitation
- do not have English as a first language
- at risk of female genital mutilation (FGM)
- at risk of forced marriage
- at risk of being drawn into extremism.

12.3 Missing children and young people. A child/young person going missing from education is a potential indicator of abuse and neglect, including sexual abuse and sexual exploitation. Step Into Learning will monitor absence and take appropriate action, particularly where young people go missing on repeated occasions. Any identifiable trends will be treated as a safeguarding concern.

12.4 When cases of Young Person on Young Person sexual violence and sexual harassment occur in its many forms, including peer-on-peer sexual violence and sexual harassment, both on-site and online [see our procedure here](#)

13 Work Experience

Step Into Learning has procedures to safeguard learners undertaking work experience and or voluntary work; including arrangements for checking people who provide placements and supervise learners on work experience and in volunteering programmes which are in accordance with statutory guidance in Keeping Children Safe in Education.

14 Digital and Online Safety

Step Into Learning takes its responsibility to ensure that learners are safe online and receive appropriate information on keeping themselves safe, as part of their induction to the and throughout the duration of the course. Information on 'Online' safety is regularly reviewed. Please refer to the Online and Digital Safety policy. Step Into Learning has taken on the guidance as updated in Keeping Children Safe in Education; filtering and monitoring is in place for our devices and networks and meets the DfE's Cyber security standards for schools and colleges as detailed in the Department for Education's new filtering and monitoring standards including risks relating to misinformation, disinformation and AI-generated content.

15 Youth produced sexual imagery (sexting)

15.1 The practice of children sharing images and videos via text message, email, social media or mobile messaging apps has become commonplace. However, this online technology has also given young people the opportunity to produce and distribute sexual imagery in the form of photos and videos. Such imagery involving anyone under the age of 18 is illegal.

15.2 Youth produced sexual imagery refers to both images and videos where;

- a person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18
- a person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult
- a person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.

15.3 All incidents of this nature should be treated as a safeguarding concern and in line with the guidance 'Sexting in schools and colleges: responding to incidents and safeguarding young people'.

15.8 Up skirting involves the taking of images or videos of a person under their clothes without them knowing for personal sexual gratification, it is now a criminal offence and will be dealt with accordingly.

16 Support for those involved with a safeguarding concern

16.1 Any form of abuse is devastating for the learner and can also result in distress and anxiety for their family and friends and for staff who become involved. Step Into Learning will support learners and their families by:

- taking all suspicions and disclosures seriously
- nominating a link person (usually from the safeguarding team) who will keep all parties informed and be the central point of contact
- Where a member of staff is the subject of an allegation made by a learner, separate link people will be nominated to avoid any conflict of interest
- responding sympathetically to any request from learners or staff for time out to deal with distress or anxiety
- maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies
- storing records securely
- offering details of helplines, counselling or other avenues of external support
- following the procedures laid down in our child protection, whistleblowing, complaints and disciplinary procedures
- co-operating fully with relevant statutory agencies
- listening to the child/young person or at-risk adult.

16.2 We recognise that staff who have become involved with a learner who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful or upsetting.

Safeguarding concerns can be distressing. Staff will be supported by:

- Acknowledging the **emotional impact** of safeguarding work.
- Offering access to:
 - Line manager support
 - DSL check-ins
 - Signposting/referral to counselling or other appropriate wellbeing services
- Allowing time and space to talk following serious incidents or disclosures.
- Supervision for DSL/DDSL

17. Action to take if learners and/or staff witness a safeguarding concern whilst on the premises

| Action required | Why it's needed | Timeframe |
|--|---|-----------------------------|
| Conduct welfare follow-ups with affected learners and/or staff. | Ensures learner/staff wellbeing, identifies if any emotional impact occurred, and demonstrates duty of care. | Immediate (within 48 hours) |
| Document the incident thoroughly (including who, what, when, and follow-up). | Provides a clear audit trail for safeguarding compliance and accountability. If DSL/DDSL is involved, this should not be logged on CPOMs (see section 4.7.7) | Immediate |

| | | |
|--|--|--|
| Review involvement of DSL/DDSL if appropriate | To determine whether a conflict of interest exists or if temporary delegation of safeguarding duties is required. | Within 1 week |
| Communicate with all learners (general reassurance statement). | Reinforces safety, transparency, and trust; reduces anxiety or speculation. | Within 3–5 days |
| Conduct an environmental review (to be conducted by the Health & Safety Officer) | Ensures workplace/learning space remains calm and professional; prevents recurrence. To include Clear steps when safeguarding staff are personally involved in incidents. Protocols for indirect learner impact. Provide staff refresher training on professional conduct and de-escalation. This reinforces behavioural expectations and professional boundaries and promotes a safe culture. | Within 2 weeks Within 1 month Within 1 month |
| Review and update safeguarding and conduct policies | To provide clear processes to address key issues (lessons learnt) | Within 2 weeks |
| Ensure that staff and/or learners have access to support where required. | Addresses emotional wellbeing for learners or staff who were unsettled by the event. | Ongoing/as required |

Actions will be proportionate and will not compromise ongoing safeguarding or police investigations.

18. Reporting directly to Child Protection Agencies

Staff should follow the reporting procedures outlined in this policy. However, they may also share information directly with MARU, Adult Safeguarding Team, Police or the NSPCC if:

- the situation is an emergency and the Designated Safeguarding Lead, their deputy and the Leadership Team are all unavailable
- they are convinced that a direct report is the only way to ensure the learner's safety
- for any other reason they make a judgement that direct referral is in the best interests of the learner.

19. Monitoring, Review and Evaluation of the Safeguarding and Welfare policy and procedures

The Leadership Team and Trustees of Step Into Learning are responsible for ensuring the regular review of this policy. It will be reviewed on an annual basis as a minimum.

20 Key Contacts

Step into Learning

Designated Safeguarding Lead (DSL) and first point of contact:

| | |
|------------------|--|
| Name | Lucy Muldowney |
| Telephone Number | 01566 701829 / 07498540465 |
| Email | lucy.muldowney@stepintolearning.org.uk |

Deputy Designated Safeguarding Leads (DDSLs)

| | |
|------------------|--|
| Name | Malcolm Wake |
| Telephone Number | 01566701827 |
| Email | Malcolm.Wake@stepintolearning.org.uk |

| | |
|------------------|--|
| Name | Siobhan Robbins |
| Telephone Number | 07508 465177 |
| Email | Siobhan.Robbins@stepintolearning.org.uk |

Nominated Trustee

| | |
|-------|--|
| Name | Vickie Bishop |
| Email | Vickie.Bishop@stepintolearning.org.uk |

Subcontractors

Transferable Skills Training

| | |
|-------|--|
| Name | Mark Ambrose |
| Email | markambrose@transferableskillstraining.com |

Cornwall Neighbourhood for Change

| | |
|-------|--|
| Name | Sarah Spargo |
| Email | sspargo@cn4c.org.uk |

The Outdoor Place

| | |
|-------|--|
| Name | Tracy Robson |
| Email | tracyr@theoutdoorplace.org.uk |

Local Authority Safeguarding contact details CORNWALL:

Adults

| | |
|------------------|--|
| Name | Cornwall and Isles of Scilly Safeguarding Adults Board |
| Telephone Number | 0300 123 4131 |

| | |
|--------------------------------------|---|
| Out of office hours Telephone Number | 01208 251300 |
| Website | https://www.cornwall.gov.uk/health-and-social-care/adult-social-care/safeguarding-adults/ |

Children

| | |
|--------------------------------------|---|
| Name | Multi Agency Referral unit (MARU) |
| Telephone Number | 0300 123 1116 |
| Out of office hours Telephone Number | 0300 1234 100 |
| Website | https://www.cornwall.gov.uk/health-and-social-care/childrens-services/child-protection-and-safeguarding/ |

Local Authority Safeguarding contact details PLYMOUTH:

Adults

| | |
|--------------------------------------|---|
| Name | Plymouth Safeguarding Adults Partnership |
| Telephone Number | 01752 668000 |
| Out of office hours Telephone Number | 01752 346984 |
| Website | https://www.plymouth.gov.uk/adult-safeguarding |

Children

| | |
|--------------------------------------|---|
| Name | Plymouth MASH |
| Telephone Number | 01752 668000 |
| Out of office hours Telephone Number | 01752 346984 |
| Website | https://www.plymouth.gov.uk/keeping-children-safe |

Local Authority Safeguarding contact details DEVON:

Adults

| | |
|--------------------------------------|---|
| Name | Devon Safeguarding Adults Partnership |
| Telephone Number | 0345 155 1007 |
| Out of office hours Telephone Number | 0345 600 0388 |
| Website | https://www.devon.gov.uk/care-and-health/adults/keeping-safe/ |

Children

| | |
|--------------------------------------|---|
| Name | Devon MASH |
| Telephone Number | 0345 155 1071 |
| Out of office hours Telephone Number | 0345 600 0388 |
| Website | https://www.devon.gov.uk/educationandfamilies/child-protection/ |