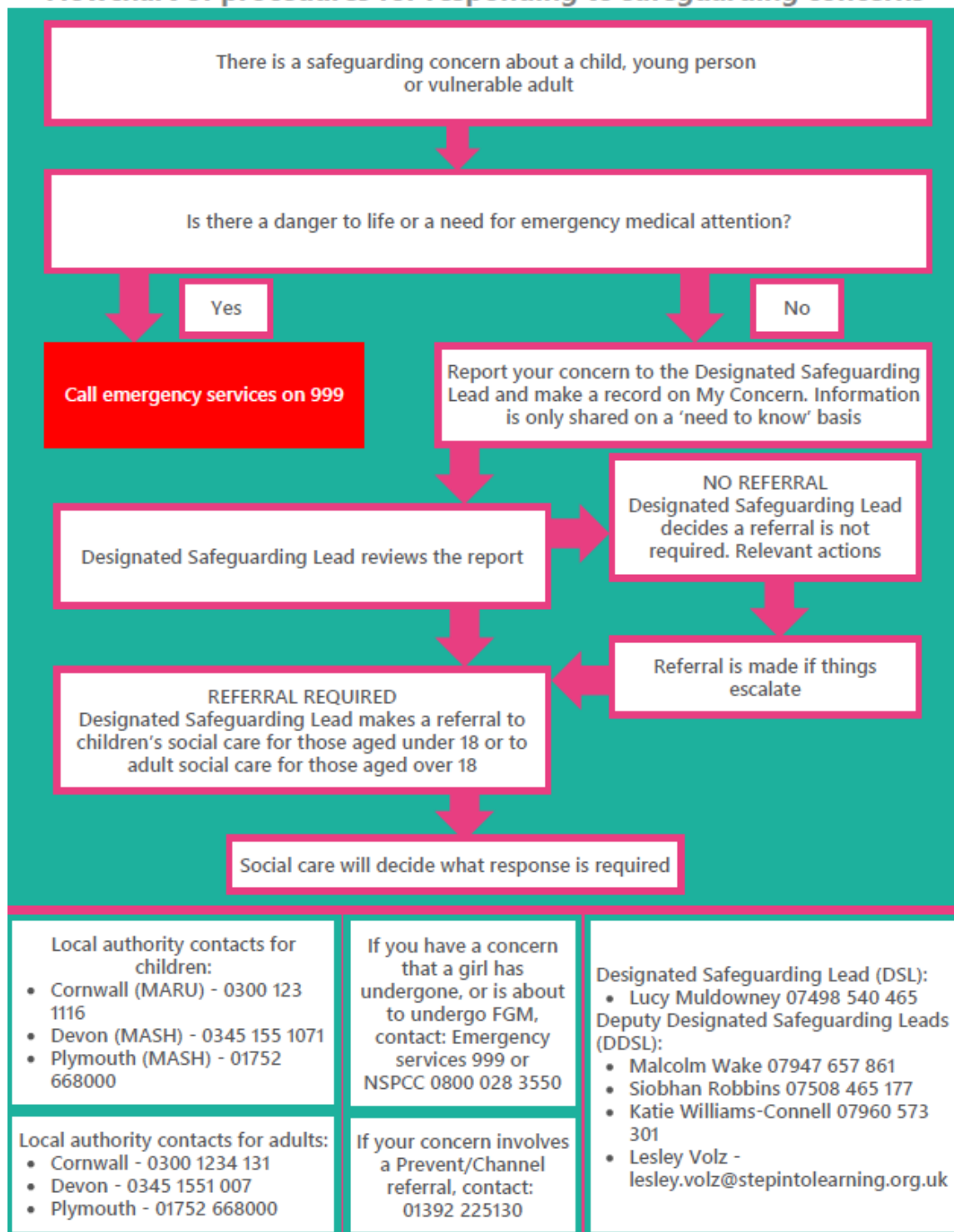




Safeguarding and Welfare Policy

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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 adults at risk. 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 adults at risk and that everyone has a responsibility for safeguarding
- indicate what action is to be taken when there is a safeguarding concern.
- ensure compliance with applicable statutory guidance, including **Keeping Children Safe in Education 2026, Working Together to Safeguard Children 2026**, the **Prevent duty guidance**, relevant local safeguarding arrangements and applicable 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 safeguarding area in document control 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 or faith-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; grooming for exploitation or radicalisation; misinformation and disinformation; harmful online content; generative artificial intelligence; and the making, sharing or manipulation of nude or semi-nude images, including AI-generated or manipulated sexual imagery

- teenage relationship abuse
- misogyny, misandry, sexism and gender-based hostility
- stalking, coercive or controlling behaviour and financial exploitation, including within teenage relationships
- modern slavery and trafficking
- serious violence, including risks associated with knives and other weapons
- harmful sexual behaviour
- abuse and exploitation facilitated through generative artificial intelligence
- racism, discriminatory behaviour and other derogatory behaviour
- 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 or faith-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
- is experiencing or is at risk of teenage relationship abuse, coercive or controlling behaviour, stalking or financial exploitation
- is at risk of serious violence, weapon-related harm, harmful sexual behaviour or other forms of child-on-child abuse

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 obligations to safeguard children and young people under 18 years of age and to support and safeguard adults at risk in accordance with applicable legislation and statutory guidance, including the Care Act 2014. Step Into Learning must have regard to Keeping Children Safe in Education 2026, where applicable to its provision, and relevant local safeguarding arrangements.

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

- All children and young people under the age of 18 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 has safeguarding responsibilities or retains responsibility for the learner

1.7 For the purpose of safeguarding adults at risk, Step Into Learning will apply the definition in the Care Act 2014.

An adult at risk is an adult aged 18 or over who:

- has needs for care and support (whether or not the local authority is meeting any of those needs);
- is experiencing, or is at risk of, abuse or neglect; and
- as a result of those needs, is unable to protect themselves against the abuse or neglect or the risk of it.

Step Into Learning will follow the relevant local authority safeguarding adults' procedures when concerns arise regarding an adult at risk.

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

- safeguard and promote the welfare of children, young people and adults at risk
- 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
- share information lawfully, proportionately and securely where this is necessary to safeguard a child, young person or adult at risk
- maintain a safe environment for all

1.9 The statutory guidance Working Together to Safeguard Children 2026 sets out the legislative requirements and expectations for services working to safeguard and promote the welfare of children and young people. Step Into Learning will have regard to the guidance as applicable to its provision and will work in accordance with relevant local multi-agency safeguarding arrangements.

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 publications:

- 'Working Together to Safeguard Children' 2026
https://assets.publishing.service.gov.uk/media/669e7501ab418ab055592a7b/Working_together_to_safeguard_children_2023.pdf
- 'Keeping Children Safe in Education' 2026. Step Into Learning will have regard to the statutory guidance Keeping Children Safe in Education 2026, including Part One and the sections applicable to post-16 providers and the learners within the scope of this policy.
- 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 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>
- Care Act 2014 <https://www.legislation.gov.uk/ukpga/2014/23/contents>
- HM Government Prevent Duty Guidance, as applicable to further education and training providers, together with any subsequent updates or replacement statutory guidance

1.11 Safeguarding Statement

1.11.1 Safeguarding is everyone's responsibility and is fundamental to the work of Step Into Learning. Safeguarding is not limited to protecting children and young people from deliberate harm. It includes promoting their welfare and protecting them from abuse, neglect, exploitation and harm, including harm that may occur online.

Safeguarding concerns may include, but are not limited to, physical, emotional and sexual abuse; neglect; bullying, harassment and discrimination; child-on-child abuse, including sexual harassment and sexual violence; online harms; self-generated intimate images and/or videos, including those created or manipulated using artificial intelligence; child criminal exploitation (CCE), child sexual exploitation (CSE), county lines and serious violence; domestic abuse; modern slavery; female genital mutilation (FGM); radicalisation and exposure to terrorism; misogyny and other forms of harmful or discriminatory behaviour; substance misuse; mental health and wellbeing; medical needs and intimate care; site and learner safety; educational and off-site visits; safer recruitment and employment practices; and any

safeguarding issues arising from the local community or the individual circumstances of a learner.

Step Into Learning recognises that safeguarding risks can affect children differently and that some children may be particularly vulnerable to harm or may require additional support. We will maintain a child-centred approach, ensuring that the best interests of the child remain at the heart of safeguarding decisions and that children receive the right help at the right time.

1.11.2 Step Into Learning recognises its moral and statutory responsibilities to safeguard and promote the welfare of children and young people. We are committed to providing a safe, welcoming and inclusive environment in which learners are respected, valued and able to learn and develop free from abuse, neglect, exploitation, discrimination and avoidable harm. Safeguarding is a shared responsibility. All staff, volunteers, contractors and those working on behalf of Step Into Learning have a full and active part to play in safeguarding children and young people. Everyone should remain vigilant to signs that a child may be experiencing or be at risk of abuse, neglect or exploitation, including online harm, and should remember that "it could happen here."

Any safeguarding concern must be acted upon immediately and reported in accordance with Step Into Learning's safeguarding and child protection procedures. Staff must know who the Designated Safeguarding Lead (DSL) and Deputy DSL are and must follow the organisation's arrangements for reporting, recording and responding to concerns. Where appropriate, Step Into Learning will work with parents and carers and with relevant external agencies, including children's social care, the police, health services and other safeguarding partners, to ensure that children receive appropriate help and protection.

Step Into Learning recognises that data protection is not a barrier to safeguarding. Information will be shared and recorded appropriately where this is necessary to protect a child or promote their welfare, in accordance with relevant legislation, statutory guidance and organisational procedures.

The welfare of children and young people is a paramount consideration in all safeguarding decisions. Step Into Learning is committed to creating a culture in which safeguarding concerns are taken seriously, responded to promptly and used to support the safety, wellbeing and best interests of every learner.

2. Definitions

For the purposes of this policy, Step Into Learning adopts the definition of safeguarding and promoting the welfare of children set out in Keeping Children Safe in Education 2026 and Working Together to Safeguard Children 2026.

For safeguarding purposes, a child is anyone under the age of 18.

2.1 Safeguarding and promoting the welfare of children means:

- providing help and support to meet the needs of children as soon as problems emerge;
- protecting children from maltreatment, whether that is within or outside the home, including online;
- preventing impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

Safeguarding is everyone's responsibility. All staff and those working on behalf of Step Into Learning has a role in identifying concerns, providing appropriate help and support, sharing information where necessary and taking prompt action to safeguard children. Staff should maintain a child-centred approach and consider at all times what is in the best interests of the child.

2.2 Child protection refers to the activity undertaken to protect specific children who are suffering, or are at risk of suffering, significant harm.

2.3 Designated Safeguarding Lead (DSL) is the person appointed by Step Into Learning to take lead responsibility for safeguarding and child protection. The DSL is the principal point of contact for staff who have safeguarding concerns about a child and is responsible for coordinating the organisation's safeguarding and child protection arrangements.

2.4 Deputy Designated Safeguarding Lead (DDSL) is a suitably trained member of staff who supports the DSL and is able to undertake the DSL role and respond to safeguarding concerns when the DSL is unavailable, ensuring that there is no unnecessary delay in responding to concerns about a child.

2.5 Prevent refers to the safeguarding responsibilities arising from the Government's Prevent strategy and the Prevent duty. Prevent is concerned with preventing people from being drawn into terrorism or supporting terrorism. Step Into Learning will have appropriate arrangements for identifying, responding to and referring concerns relating to radicalisation and extremism, in accordance with the Prevent duty and relevant local procedures.

2.6 Prevent Single Point of Contact (Prevent SPOC) is the person identified by Step Into Learning as the organisational point of contact for Prevent-related concerns and matters.

2.7 Safeguarding Team refers to the trained staff appointed by Step Into Learning to support the DSL in fulfilling the organisation's safeguarding and child protection responsibilities. This is an internal organisational term and does not replace the statutory role and responsibilities of the DSL.

2.8 Abuse and neglect refer to forms of maltreatment of a child. A person may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused or neglected within their family or in an institutional or community setting by people known to them or, more rarely, by others. Abuse can take place wholly online, or technology

may be used to facilitate offline abuse. Children may be abused by adults or by other children.

Safeguarding concerns can arise from a wide range of circumstances and may include abuse, neglect and exploitation occurring within or outside the home and online. Step Into Learning recognises that no single practitioner will have a full picture of a child's needs and circumstances and that effective safeguarding requires appropriate information sharing and multi-agency working.

2.9 Adult safeguarding

For learners aged 18 and over, Step Into Learning will apply its adult safeguarding arrangements and relevant legislation and statutory guidance, including the Care Act 2014, where applicable. Adult safeguarding arrangements are distinct from the child safeguarding duties set out in KCSIE 2026.

Where a learner reaches the age of 18 while receiving support under child safeguarding arrangements, Step Into Learning will consider their individual circumstances and ensure appropriate transition to adult safeguarding arrangements where required.

3. Safeguarding Responsibilities, Principles and Aims

3.1 Step Into Learning's policies and procedures for safeguarding children and young people under the age of 18, and for adult safeguarding where applicable, will be developed and implemented in accordance with relevant legislation, statutory guidance and local safeguarding arrangements.

For safeguarding children and young people, this includes Keeping Children Safe in Education 2026 (KCSIE) and Working Together to Safeguard Children 2026, together with relevant local multi-agency safeguarding arrangements and procedures in Cornwall. Step Into Learning will also comply with relevant adult safeguarding legislation, statutory guidance and local arrangements for learners aged 18 and over, including the Care Act 2014, where applicable.

The organisation will review its safeguarding arrangements regularly to ensure that they remain consistent with current statutory guidance, legislation and local safeguarding procedures

3.2 The Step Into Learning Lead Safeguarding Trustee, working with the Designated Safeguarding Lead (DSL) and Senior Management Team, will ensure that Trustees and senior leaders understand and fulfil their safeguarding responsibilities.

The Board of Trustees and senior leaders will ensure that effective safeguarding and child protection arrangements are in place, are regularly reviewed and are appropriately resourced.

Step Into Learning recognises that it is part of the wider safeguarding system and will work constructively with children's social care, the police, health services, safeguarding partners and other relevant agencies where appropriate.

Trustees and senior leaders will promote a culture in which safeguarding is recognised as everyone's responsibility, concerns are taken seriously, and children are protected through effective prevention, Family Help, information sharing, referral and multi-agency working.

3.3 Step Into Learning will maintain an appropriately trained safeguarding team to support the DSL in fulfilling the organisation's safeguarding and child protection responsibilities. The DSL and Deputy DSL(s) will undertake safeguarding and child protection training appropriate to their roles and responsibilities and will refresh their knowledge and skills at least every two years, with additional updates and training undertaken as required.

All staff will receive safeguarding and child protection training appropriate to their role and responsibilities and will receive regular updates, including updates relating to local safeguarding arrangements, emerging safeguarding risks and changes to statutory guidance. Where members of the safeguarding team undertake responsibilities equivalent to those of a DSL or Deputy DSL, they will receive training appropriate to those responsibilities

3.4 Policy Principals

Step Into Learning's safeguarding practice is based on the following principles:

- **Safeguarding is everyone's responsibility.** Everyone working for or on behalf of Step Into Learning has a role in identifying and responding to safeguarding concerns.
- **The best interests and welfare of the child** are central to safeguarding practice.
- **A child-centred approach will be maintained at all times.** The wishes, feelings and lived experiences of children will be considered and, where appropriate, reflected in safeguarding decisions.
- **Children need the right help at the right time.** Step Into Learning will seek to identify concerns at the earliest opportunity and provide or facilitate appropriate help, support and protection.
- **All staff have a responsibility to act on concerns.** Staff must report any suspicion, concern, disclosure or allegation that may indicate that a child is at risk of harm in accordance with Step Into Learning's safeguarding procedures.
- **Staff should maintain an attitude of "it could happen here".** Safeguarding concerns must not be dismissed because they appear unlikely or because there is no obvious evidence of harm.
- **All children have an equal right to be safeguarded from abuse, neglect, exploitation and harm,** regardless of age, sex, disability, race, ethnicity, religion or belief, sexual orientation, gender reassignment or any other characteristic or circumstance.
- **Safeguarding concerns will be taken seriously and responded to promptly.** Step Into Learning will act proportionately and in accordance with relevant statutory guidance, legislation and local safeguarding procedures.

- **Information will be shared appropriately where this is necessary to safeguard and promote the welfare of a child.** Data protection and confidentiality will not be treated as a barrier to appropriate safeguarding information sharing.
- **Children and staff involved in safeguarding or child protection matters will receive appropriate support.**
- Step Into Learning recognises that children may experience **multiple or overlapping safeguarding risks**, including risks arising within the home, the community, educational settings or online.

3.5 Policy Aims

This Policy aims to:

- promote an environment in which all learners feel safe, secure, valued, respected and listened to;
- ensure that children know how to raise a concern or seek help and are confident that they will be listened to and supported;
- ensure that all staff understand their safeguarding and child protection responsibilities and know how and when to report concerns;
- ensure that staff understand that safeguarding is everyone's responsibility and that concerns must be acted upon promptly;
- provide staff with the knowledge, training and information necessary to identify and respond appropriately to safeguarding concerns;
- ensure that children receive appropriate help and support at the earliest opportunity, including through Family Help and appropriate referral to statutory services where required;
- maintain effective arrangements for safer recruitment, including appropriate pre-employment checks and the maintenance of appropriate safeguarding and recruitment records;
- ensure that safeguarding arrangements are regularly reviewed and monitored by senior leaders and Trustees;
- work effectively with parents, carers and relevant external agencies, where appropriate, to safeguard children and promote their welfare; and
- contribute appropriately to the wider safeguarding system through effective information sharing, partnership working, referral and participation in multi-agency safeguarding arrangements.

3.6 Step Into Learning recognises that its role is to identify concerns, provide appropriate support, make referrals and contribute to safeguarding processes rather than undertake investigations into suspected abuse.

Where a child or young person makes a disclosure, or where a member of staff has a safeguarding concern, staff must follow Step Into Learning's safeguarding reporting procedures immediately. Staff must not undertake their own investigation or attempt to establish whether abuse has occurred.

Staff should listen carefully, remain calm, take concerns seriously and record the information accurately and factually. Staff should not promise confidentiality. They should explain, where

appropriate, that information may need to be shared with the DSL or relevant safeguarding agency in order to protect the child.

Where a concern indicates that a child may be suffering, or may be at risk of suffering, harm, Step Into Learning will make an appropriate referral to children's social care, the police or another relevant agency in accordance with local safeguarding procedures.

Step Into Learning will work with relevant agencies and contribute to assessments, information sharing and safeguarding plans as required.

For learners aged 18 and over, Step Into Learning will follow its adult safeguarding procedures and relevant legislation and statutory guidance, including the Care Act 2014 where applicable.

4. Roles and Responsibilities

4.1 We understand that our responsibility to safeguard children, young people and adults including adults at risk 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 2026 and Keeping Children Safe in Education 2026.

4.2 Step Into Learning has a DSL and a team of DDSLs (the 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: 07498540465
The Deputy Designated Persons (DDSLs) are:	Malcolm Wake Siobhan Robbins Katie Williams-Connell Lesley Volz
Email: Malcolm.Wake@stepintolearning.org.uk Siobhan.Robbins@stepintolearning.org.uk Katie.williams-connell@stepintolearning.org.uk Lesley.Volz@stepintolearning.org.uk	Tel: 07947 657861 Tel: 07508 465177 Tel: 07960573301 Tel: 07518863161
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 Designated Safeguarding Lead (DSL) will be an appropriately trained and suitably senior member of staff with the status and authority required to fulfil the role effectively. The DSL will be provided with sufficient time, funding, training, resources and support to carry out their safeguarding and child protection responsibilities.

The DSL will take lead responsibility for safeguarding and child protection within Step Into Learning. This lead responsibility will not be delegated, although specific activities may be delegated to appropriately trained Deputy DSLs.

The DSL will undertake safeguarding and child protection training appropriate to their role, with this training updated at least every two years, together with regular safeguarding updates and additional training as required. The DSL will also undertake appropriate Prevent training.

During Step Into Learning's normal operating hours, the DSL or a suitably trained Deputy DSL will be available to staff to discuss safeguarding concerns. Appropriate cover arrangements will be maintained for planned and unplanned periods when the DSL is unavailable, including activities taking place outside normal operating hours.

4.4.1 The DSL:

- takes lead responsibility for safeguarding and child protection within Step Into Learning
- acts as a source of support, advice and expertise for all staff in relation to safeguarding and child protection
- ensures that safeguarding concerns are responded to promptly and appropriately, including where a child may be in immediate danger
- ensures that accurate, confidential and up-to-date records are maintained of safeguarding concerns, including concerns that do not result in an immediate referral. Records will include the concern, actions taken, decisions made, the rationale for decisions and outcomes
- refers cases to children's social care, the police or other relevant agencies where appropriate and in accordance with local safeguarding procedures
- makes or supports referrals where a crime may have been committed and liaises with the police where appropriate
- acts as a point of contact with relevant safeguarding partners and other external agencies

- liaises with the Senior Management Team and Trustees, as appropriate, regarding safeguarding issues, risks, trends and significant ongoing safeguarding matters, while maintaining appropriate confidentiality and information-sharing arrangements
- participates in, or ensures appropriate representation at, strategy discussions, child protection conferences, core groups, multi-agency meetings and other safeguarding processes, and contributes to assessments and plans as required
- ensures that relevant information is shared appropriately with safeguarding partners and other agencies where necessary to safeguard and promote the welfare of children
- understands locally agreed processes for providing Family Help and statutory intervention and supports staff in identifying when Family Help or a referral to children's social care may be appropriate
- ensures that all staff understand the organisation's safeguarding systems, know who the DSL and Deputy DSLs are, know how to report concerns and understand their safeguarding responsibilities
- ensures that all staff receive safeguarding and child protection training appropriate to their role, together with regular safeguarding updates and additional training where required
- ensures that staff understand the distinction between safeguarding concerns about children, low-level concerns about adults working with children, and allegations that meet the harm threshold, and that appropriate procedures are followed in each case
- ensures that concerns and allegations relating to staff, volunteers, contractors and other adults working with children are dealt with in accordance with Step Into Learning's procedures and relevant local authority arrangements, including referral to the Local Authority Designated Officer (LADO) where appropriate
- supports effective safer recruitment arrangements and provides safeguarding advice where required
- understands and supports Step Into Learning's responsibilities under the Prevent duty, including identifying concerns relating to radicalisation and extremism, making appropriate referrals through relevant Prevent processes and supporting staff in responding to Prevent concerns
- understands the Channel process and supports or participates in referrals where appropriate

- ensures that children subject to child protection plans or other safeguarding arrangements receive appropriate monitoring and that unexplained or concerning absences are responded to promptly in accordance with Step Into Learning's attendance, safeguarding and local authority procedures
- ensures that appropriate action is taken where children are missing from education or where attendance patterns raise safeguarding concerns
- ensures that Step Into Learning's safeguarding and child protection policy is reviewed at least annually and updated as necessary in response to changes in legislation, statutory guidance, local safeguarding arrangements, organisational learning and emerging safeguarding risks
- works with Trustees and senior leaders to ensure that safeguarding arrangements are effectively implemented, monitored and reviewed
- ensures that the safeguarding and child protection policy is publicly available and that parents and carers are aware of Step Into Learning's safeguarding responsibilities and the circumstances in which concerns may be referred to external agencies
- maintains links with relevant safeguarding partners and local safeguarding arrangements and ensures that staff are made aware of relevant local procedures, safeguarding developments, training opportunities and emerging risks
- takes lead responsibility for online safety within the safeguarding function, including understanding Step Into Learning's filtering and monitoring systems and processes
- works with relevant IT staff or providers to ensure that filtering and monitoring systems are appropriately implemented, reviewed annually and are effective
- reviews relevant filtering and monitoring reports and ensures that safeguarding concerns identified through these systems are appropriately responded to
- provides Trustees and senior leaders with appropriate assurance regarding the effectiveness of safeguarding, online safety, filtering and monitoring arrangements

For learners aged 18 and over, the DSL will ensure that appropriate adult safeguarding procedures are followed, in accordance with Step Into Learning's adult safeguarding policy, the Care Act 2014 and relevant local arrangements where applicable.

4.5 The Role of the Deputy Designated Safeguarding Leads

The DDSL will be appropriately trained and receive appropriate refresher training 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.

- **Acts in the DSL's absence**

Must be trained to the same standard as the DSL.

Can make safeguarding decisions and referrals.

- **Supports safeguarding processes**

Help manage and review safeguarding concerns.

Maintain accurate, secure records.

- **Works with staff**

Be available for staff to report concerns.

Offer advice and guidance on safeguarding issues.

- **Liaises with agencies**

Support communication with:

Children's social care

Police

Other safeguarding partners

- **Promotes safeguarding culture**

Help ensure safeguarding policies are understood and followed.

Contribute to training and awareness.

Deputies do not automatically share full responsibility at all times — the DSL retains overall lead responsibility, even when tasks are delegated.

4.6 The Role of the Trustees

4.6.1 The Trustees provide strategic leadership, oversight and challenge in relation to safeguarding and child protection and ensure that effective arrangements are in place to safeguard and promote the welfare of children.

The Trustees will ensure that:

- Step Into Learning appoints a Designated Safeguarding Lead (DSL) who is appropriately senior within the organisation and has the status and authority necessary to fulfil the role effectively
- the DSL is appropriately trained to undertake the role, including training in safeguarding and child protection and multi-agency working, and that their knowledge and skills are updated at least every two years, with regular safeguarding updates and additional training as required
- the DSL is provided with sufficient time, funding, training, resources and support to fulfil their safeguarding and child protection responsibilities effectively

- safeguarding and child protection have appropriate strategic leadership and oversight at Trustee level
- Trustees provide effective scrutiny, challenge and assurance to ensure that safeguarding arrangements are implemented effectively, are consistent with statutory requirements and are subject to continuous improvement
- the DSL's safeguarding and child protection responsibilities are explicit within their job description
- Step Into Learning has an effective Safeguarding and Welfare Policy and relevant safeguarding procedures in place, including a staff Code of Conduct, which are consistent with current legislation, statutory guidance and local safeguarding arrangements
- the Safeguarding and Welfare Policy is reviewed at least annually and updated as necessary, and is made publicly available on the Step Into Learning website or by other appropriate means
- effective procedures are in place for responding to allegations and concerns about adults working with children, including staff, volunteers, contractors, members of the Leadership Team, the DSL, the Chair of Trustees and other Trustees, in accordance with statutory guidance and local authority procedures
- appropriate procedures are in place for responding to concerns about children, including child-on-child abuse, and that such concerns are taken seriously and responded to promptly
- Trustees understand the distinction between allegations that meet the harm threshold, low-level concerns and other safeguarding concerns, and provide appropriate oversight and challenge of the organisation's arrangements for managing these
- effective safer recruitment procedures are in place, including appropriate pre-employment checks and the maintenance of required recruitment and safeguarding records, in accordance with KCSIE and relevant legislation
- all staff, including temporary staff, agency staff, volunteers and other adults working with children, receive appropriate safeguarding information and are provided with access to the Safeguarding and Welfare Policy, staff Code of Conduct and the relevant parts of Keeping Children Safe in Education
- staff receive appropriate safeguarding and child protection training and regular updates appropriate to their roles and responsibilities
- Step Into Learning understands and contributes appropriately to local Family Help and multi-agency safeguarding arrangements

- children are provided with appropriate safeguarding education as part of a broad and balanced curriculum, including education that supports children to recognise risks, seek help and keep themselves safe, both offline and online
- appropriate arrangements are in place to safeguard children from risks including abuse, neglect, exploitation, child-on-child abuse, serious violence, radicalisation, online harm and other safeguarding risks relevant to the children and community served by Step Into Learning
- safeguarding is a standing item on the Trustee meeting agenda, with appropriate reporting and challenge to ensure effective oversight of safeguarding practice, emerging risks, allegations, low-level concerns and safeguarding trends
- an annual safeguarding review or deep dive is undertaken as part of Step Into Learning's governance assurance arrangements to scrutinise safeguarding practice, assess compliance with statutory requirements, identify areas for improvement and monitor the effectiveness of actions taken
- undertake an annual filtering and monitoring review
- Trustees receive sufficient safeguarding information and assurance to enable them to fulfil their strategic oversight responsibilities without compromising the confidentiality of individual safeguarding cases

4.6.2 The Trustees will nominate an appropriate Trustee or senior leader to liaise with the Local Authority Designated Officer (LADO), local authority and other relevant agencies where an allegation is made against the Head of the organisation, a member of the Senior Management Team, the DSL, the Chair of Trustees or another Trustee, in accordance with local safeguarding procedures.

Where an allegation concerns the person normally responsible for managing allegations, appropriate arrangements will be made to ensure that the matter is dealt with independently and in accordance with statutory guidance and local procedures.

4.6.3 The Trustees will ensure that safeguarding, safer recruitment and procedures for managing allegations against adults working with children take account of current legislation, Keeping Children Safe in Education 2026, Working Together to Safeguard Children 2026 and relevant local safeguarding partnership and local authority procedures.

Trustees will ensure that safeguarding arrangements are regularly monitored and reviewed and that identified weaknesses are addressed promptly.

4.7 The Role of the Step into Learning Senior Management Team

The Senior Management Team has a key role in ensuring that effective safeguarding and child protection arrangements are implemented, embedded and monitored across Step Into Learning.

Senior leaders recognise that safeguarding is everyone's responsibility and will promote a strong safeguarding culture in which concerns are taken seriously, acted upon promptly and appropriately, and children are supported in accordance with their best interests.

4.7.1 Senior Management Team will:

- ensure that the Safeguarding and Child Protection Policy and associated procedures are implemented effectively and followed by all staff
- ensure that all staff understand their individual safeguarding responsibilities and know how and when to report safeguarding concerns
- work closely with the Designated Safeguarding Lead (DSL) and Deputy DSL(s) to ensure that safeguarding arrangements are effective and responsive to identified and emerging risks
- ensure that the DSL has appropriate status, authority, time, funding, training, resources and support to fulfil their safeguarding and child protection responsibilities effectively
- provide effective leadership and promote a culture in which safeguarding is prioritised throughout Step Into Learning
- ensure that safeguarding concerns, allegations and disclosures are responded to promptly and in accordance with Step Into Learning's procedures, statutory guidance and local safeguarding arrangements
- ensure that appropriate action is taken where safeguarding concerns indicate that early help, children's social care, the police or another external agency may need to be involved
- support effective multi-agency working and cooperation with children's social care, the police, health services, safeguarding partners and other relevant agencies
- ensure that staff receive appropriate safeguarding and child protection training and regular updates relevant to their roles and responsibilities
- monitor safeguarding training, referrals, attendance and children missing from education, emerging safeguarding risks, allegations, low-level concerns and other relevant safeguarding information, while maintaining appropriate confidentiality
- ensure that appropriate arrangements are in place for online safety, including effective filtering and monitoring, and that safeguarding concerns identified through these arrangements are acted upon

- ensure that safeguarding is appropriately reflected in organisational policies, procedures, recruitment, staff development, learner support and operational practice
- provide regular safeguarding reports, updates and appropriate assurance to Trustees, including information about safeguarding trends, emerging risks, compliance, actions and areas requiring further improvement and
- ensure that recommendations arising from safeguarding reviews, audits, serious incidents, complaints, inspections or multi-agency learning are acted upon and monitored through to completion

The Senior Management Team will work collaboratively with the DSL and Trustees to ensure that Step Into Learning's safeguarding arrangements remain effective, are reviewed regularly and are responsive to changes in statutory guidance, local safeguarding arrangements and emerging safeguarding risks.

4.8 The Role of all staff

4.8.1 Safeguarding is everyone's responsibility. Everyone who comes into contact with learners, children, young people, adults at risk and their families have a role to play in safeguarding. All staff have a responsibility to contribute to a strong safeguarding culture, to be alert to concerns about the welfare and safety of children and adults at risk, and to take appropriate action without delay.

For children and young people under 18, all staff must follow the safeguarding and child protection arrangements set out in this policy and in Keeping Children Safe in Education (KCSIE) 2026. All staff must read and understand Keeping Children Safe in Education 2026, Part One, in full. There is no condensed or alternative reading route. Staff must also know how to access and follow Step Into Learning's safeguarding procedures.

4.8.2 All Step Into Learning staff should identify children and at-risk adults that may benefit from support from external services, especially Family Help. In the first instance staff should record their concerns on My Concern 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.

4.8.4 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.

4.8.6 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.

4.8.6 If a safeguarding concern involves a member of the safeguarding team, staff should not report this on My Concern. Instead a safeguarding incident report form 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.

4.8.8 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 Senior Management Team should be reported to the Chair of Trustees.

4.9 Allegations against staff

4.9.1 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 2026.

4.9.3 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.

4.9.6 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.

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

4.10 Staff training

4.10.1 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.

4.10.2 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, Senior Management Team and trustees will receive training that is regularly updated. All staff will also receive safeguarding updates via the safeguarding team monthly newsletter, email, weekly e-bulletins, website access and staff meetings throughout the year.

4.11 Abuse of Positions of Trust

4.11.1 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 (KCSIE) 2026 and relevant local safeguarding procedures when recruiting staff and other individuals who may work with children.

Step Into Learning carries out the appropriate pre-employment and safer recruitment checks for the role, including verifying the applicant's identity, qualifications, employment history and suitability to work with children, and obtaining appropriate references and other required checks.

As part of its safer recruitment and due diligence processes, Step Into Learning may undertake online searches of shortlisted candidates, in accordance with KCSIE 2026.

Where an online search identifies information relevant to a candidate's suitability, this will be considered and addressed appropriately.

The Step Into Learning Staff Recruitment Procedures set out the recruitment process and required checks in full.

At least one person involved in the recruitment process will have completed appropriate safer recruitment training. Step Into Learning will ensure that those responsible for recruitment understand their safeguarding responsibilities and apply safer recruitment principles consistently.

5.2 Step Into Learning will obtain written confirmation from supply agencies and other third-party organisations that the appropriate pre-employment and safeguarding checks have been completed for individuals supplied to work with learners. Step Into Learning will take reasonable steps to assure itself that the required checks have been completed and will verify the identity of individuals when they commence work.

Where applicable, Step Into Learning will maintain a Single Central Record (SCR) of the recruitment and safeguarding checks required by KCSIE 2026. The SCR and associated recruitment records will be maintained securely and in accordance with applicable data protection and recordkeeping requirements.

5.3 Volunteers, including Trustees where applicable, will undergo enhanced DBS checks including barred list checks before beginning any regulated activity. The previous supervision exemption no longer applies. Step Into Learning will determine the appropriate level of checking before a volunteer begins duties. Where checks are in progress, volunteers will be appropriately supervised and must not undertake regulated activity or unsupervised access to children until all required checks are satisfactorily completed, in line with KCSIE 2026.

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 children, staff are uniquely placed to observe changes in behaviour and the outward signs of abuse. Children 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. Staff must be aware at all times that 'it could happen here'.

9.2 The indicators of abuse are outlined in Keeping Children Safe in Education 2026. Staff must be aware of these and report their concerns using My Concern. Staff should exercise professional curiosity, but must not investigate allegations or attempt to determine whether abuse has occurred.

9.3 Taking Action

Key points for staff to remember for taking action are:

- in an emergency call 999
- verbally report your concern without delay to one of the safeguarding team before recording on My Concern
- 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

- don't promise confidentiality;
- don't ask leading questions;
- don't investigate;
- don't make assumptions;
- record the child's words as accurately as possible;
- report to DSL/DDSL without delay.
- 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 My Concern 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 Effective information sharing is essential to safeguarding and promoting the welfare of children. Data protection legislation does not prevent the sharing of information where this is necessary to safeguard a child. Staff should share information lawfully, proportionately and appropriately with those who need it to safeguard the child.

Information should not be withheld simply because of concerns about data protection. Staff should follow Step Into Learning's information-sharing and safeguarding procedures and seek advice from the DSL/DDSL where necessary.

9.6 All safeguarding information, including safeguarding chronologies and records of concerns, will be held securely on My Concern or another approved recording system when My Concern is not available.

Safeguarding records must be accurate, factual, appropriately detailed and securely maintained. Records should include, where applicable:

- a summary of the concern
- information received or observed
- actions taken
- decisions made
- the rationale for decisions
- outcomes and any subsequent actions

9.7 Consent is not required as a precondition to sharing information where information sharing is necessary and lawful to safeguard a child. The DSL will consider whether information should be shared, with whom, and on what lawful basis, taking account of the circumstances and the need to protect the child.

Where information is shared without consent, the reason for doing so should be recorded where appropriate. Where appropriate and safe to do so, Step Into Learning will communicate with children and parents/carers about information sharing. However, seeking consent or informing a child or parent/carer must not delay action where this could place a child at further risk or prejudice safeguarding action.

9.8 Reporting in the absence of DSL/DDSL The absence or unavailability of the DSL/DDSL must not prevent staff from taking immediate action to safeguard a child.

If the DSL and DDSL cannot be contacted:

- If there is an immediate risk to life or serious harm call 999
- 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 My Concern as soon as practical after the incident
- Inform the DSL/DDSL as soon as they become available and ensure an appropriate handover takes place.

Staff should not wait for the DSL/DDSL to become available where doing so would delay action necessary to safeguard a child. Where staff believe that appropriate action has not been taken following a safeguarding concern, they must escalate the concern in accordance with Step Into Learning's safeguarding and escalation procedures.

10. Prevent, Radicalisation and Extremism

10.1 Definitions

Prevent is part of the Government's counter-terrorism strategy, CONTEST. Its aim is to stop people from becoming terrorists or supporting terrorism. Prevent also involves early intervention to support people who may be susceptible to radicalisation and, where appropriate, support disengagement from terrorism.

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.

Extremist ideology refers to ideologies that can contribute to or encourage people towards terrorism or support for terrorism. Prevent recognises that people may hold a wide range of lawful political, religious or other views. Prevent activity must therefore be proportionate, evidence-based and focused on safeguarding people who may be susceptible to radicalisation into terrorism.

Terrorism has the meaning given to it in relevant UK counter-terrorism legislation, including the Terrorism Act 2000.

10.1 Step Into Learning recognises that learners may be vulnerable to a range of influences that could contribute to radicalisation or involvement in terrorism. These influences may occur online or offline and may include exposure to extremist or terrorist content, exploitation by others, social isolation, or other vulnerabilities.

Safeguarding children from the risk of radicalisation is part of Step Into Learning's wider safeguarding responsibilities.

Step Into Learning does not tolerate terrorism, support for terrorism or behaviour that creates a safeguarding risk through radicalisation or extremist influence.

Our safeguarding arrangements, curriculum, learning environment and support for learners will contribute to preventing people from being drawn into terrorism. Staff will remain alert to changes in behaviour, circumstances or other indicators that may suggest a learner is susceptible to radicalisation.

Prevent activity will be undertaken proportionately and in a manner that respects lawful freedom of expression, while ensuring that concerns relating to terrorism or radicalisation are identified and acted upon appropriately.

10.2 The Prevent Duty

The Designated Safeguarding Lead (DSL) is the designated Prevent lead/Single Point of Contact (SPOC) for Step Into Learning in relation to Prevent matters.

Working with the Leadership Team, Safeguarding Team and Trustee with responsibility for safeguarding, the DSL will ensure that Step Into Learning has appropriate arrangements in place to comply with the Prevent duty under section 26 of the Counter-Terrorism and Security Act 2015 and has regard to the Prevent Duty Guidance: England and Wales (2023).

The DSL/Prevent lead will:

- maintain an appropriate understanding of the Prevent risk within Step Into Learning's context
- ensure relevant staff receive appropriate Prevent awareness training
- ensure staff understand how to recognise possible signs that a learner may be susceptible to radicalisation
- ensure staff know how to report and escalate Prevent concerns
- maintain effective links with the relevant Local Authority Prevent lead, safeguarding partners and police
- ensure Prevent concerns are considered through the organisation's safeguarding procedures
- make or support Prevent referrals where appropriate;
- understand the purpose and operation of the Channel programme and how it provides early intervention and support for people susceptible to radicalisation;
- ensure Prevent concerns and referrals are appropriately recorded and information is shared lawfully and proportionately; and

- keep Prevent arrangements under review in light of local, regional and national risks.

The DSL/Prevent lead will receive more in-depth Prevent training, including understanding extremist and terrorist ideologies, the referral process and working with Channel panels. This training should be refreshed at least every two years, alongside regular updates where required by changes in risk, guidance or local circumstances.

10.3 Staff Responsibilities

All relevant staff must have an appropriate understanding of Prevent and know how radicalisation may present within the context of their work.

Staff should:

- remain alert to signs that a learner may be susceptible to radicalisation
- recognise that radicalisation is an individual process and may present differently from person to person
- report concerns to the DSL/Prevent lead without delay
- provide factual information and avoid attempting to investigate or determine whether a learner has been radicalised
- understand that concerns should be considered in the context of the learner's wider circumstances and vulnerabilities
- follow the notice, check, share approach when considering a Prevent concern
- cooperate with safeguarding partners, police, the Local Authority and Channel processes where appropriate

A Prevent concern should be considered as a safeguarding concern and managed through Step Into Learning's established safeguarding procedures. The DSL/Prevent lead will determine whether the concern meets the threshold for a Prevent referral and will seek appropriate advice where necessary.

10.4 Prevent Referrals and Channel

Where there is a concern that a learner may be susceptible to radicalisation or may be at risk of becoming involved in terrorism or supporting terrorism, the concern should be reported to the DSL/Prevent lead.

The DSL/Prevent lead will consider the concern, gather relevant information and seek appropriate advice. Where a Prevent referral is appropriate, it will be made through the relevant local referral arrangements.

A Prevent referral does not automatically mean that a person will enter the Channel programme. Referrals are assessed to determine whether the person is susceptible to radicalisation and whether Channel support is appropriate.

Channel is a voluntary, multi-agency safeguarding programme providing tailored support to people who may be susceptible to being radicalised into terrorism.

Step Into Learning will cooperate with the police, Local Authority and other relevant partners where a learner is referred for consideration through Prevent or Channel.

11. Looked After Children & Care Leavers

11.1 Looked-after children

Step Into Learning recognises that looked-after children, previously looked-after children and care leavers may have additional safeguarding, welfare and educational needs. Staff should be alert to these needs and ensure that safeguarding concerns are identified, reported and responded to in accordance with this policy.

Children may become looked after for a range of reasons, including where they have experienced, or are at risk of experiencing, abuse or neglect. Staff should understand that a child's looked-after status may be an important factor when considering their individual circumstances, vulnerabilities and support needs.

Staff should:

- understand that looked-after and previously looked-after children may have experienced trauma, disruption, loss or other adverse experiences;
- maintain a child-centred approach and consider the individual child's needs and best interests;
- remain alert to safeguarding concerns, changes in behaviour, attendance, presentation or circumstances;
- ensure that safeguarding concerns are reported promptly to the DSL/DDSL in accordance with this policy;
- work appropriately with the child's social worker, Virtual School Head (VSH), local authority and other relevant professionals where required;
- support appropriate information sharing to promote the child's safety, welfare and educational outcomes; and
- maintain appropriate confidentiality regarding the child's looked-after status and personal circumstances.

Information about a child's looked-after or previously looked-after status, placement, care arrangements and the level of authority delegated to a carer must be treated sensitively and shared only with those who have a legitimate need to know.

Where a child is looked after, Step Into Learning will work with the relevant local authority and other professionals, including the child's social worker, to support the child's safeguarding, welfare and educational needs.

11.2 Care Leavers

Step Into Learning recognises that care leavers may continue to require support and may have particular vulnerabilities as they transition to greater independence.

Where Step Into Learning supports a care leaver, relevant staff will work with the young person and appropriate professionals to identify and respond to safeguarding, welfare, educational or support needs.

For learners aged 18 and over, safeguarding arrangements will also take account of the organisation's adult safeguarding responsibilities, where applicable.

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

12.1 Some children may be more vulnerable to abuse, neglect, exploitation or other safeguarding risks because of their individual circumstances, experiences or wider social and environmental factors.

Step Into Learning recognises that vulnerability is individual and contextual. A child's age, disability, special educational needs, communication needs, family circumstances, identity, experiences or social environment may affect the way safeguarding concerns present and the barriers a child may face in seeking help or disclosing abuse.

Increased vulnerability may also be associated with prejudice, discrimination, social exclusion, isolation, unequal access to support or safeguarding processes that do not sufficiently recognise a child's individual circumstances. Staff must therefore avoid assumptions about vulnerability and consider the individual needs, circumstances and best interests of each child.

Mental health, emotional wellbeing and distress are important safeguarding considerations. Where a learner's mental health needs place them at risk of harm, self-neglect, exploitation or significant impairment of health or development, those concerns must be treated as safeguarding concerns and reported to the DSL or Deputy DSL without delay.

12.2 Children who may require particular safeguarding consideration

To ensure that all children receive appropriate protection and support, staff should give particular consideration to children who may be at increased risk of safeguarding concerns, including those who:

- have special educational needs and/or disabilities (SEND)
- have a physical or mental health condition or other additional needs
- are looked-after or previously looked-after children
- are young carers
- are experiencing or have experienced domestic abuse
- have a parent or carer in prison
- are affected by parental mental health difficulties
- are affected by parental substance misuse
- are experiencing family instability, homelessness or temporary accommodation
- are living away from home or experiencing a transient lifestyle
- are asylum-seeking or refugee children
- experience social isolation or exclusion
- have communication difficulties or additional communication needs
- may face barriers to disclosure because of language or communication needs
- are at risk of discrimination, prejudice or abuse because of characteristics such as race, ethnicity, religion, disability or sexual orientation
- are at risk of bullying, cyberbullying or other forms of child-on-child abuse;
- are at risk of sexual violence or sexual harassment
- are at risk of sexual exploitation or other forms of child exploitation
- are at risk of criminal exploitation, including county lines activity
- are at risk of trafficking or modern slavery
- are at risk of abuse linked to cultural or family practices, including forced marriage or female genital mutilation (FGM)
- may be at risk of honour-based abuse
- may be vulnerable to radicalisation or being drawn into terrorism
- are missing from education or frequently absent
- are children who are questioning their gender identity or exploring their gender, and who may need additional support, privacy and consideration, including in relation to parental involvement and the handling of personal information and records, in line with statutory guidance.
- are experiencing or exposed to harmful online content, online abuse or other online safeguarding risks
- have experienced trauma, loss or other adverse childhood experiences

This list is not exhaustive. Staff must consider the individual circumstances of each child and remain alert to safeguarding concerns regardless of whether the child falls within one of the categories above.

A child may experience multiple or overlapping vulnerabilities, and safeguarding concerns should be considered in the context of the child's wider circumstances.

12.3 Children Missing from Education

A child going missing from education can be a potential indicator of safeguarding concerns, including abuse, neglect, exploitation or other risks. Step Into Learning will monitor attendance and engagement and will take appropriate action where a child is absent or disengages from education without a satisfactory explanation.

Staff should report unexplained or concerning absence, changes in attendance or patterns of disengagement to the DSL/DDSL in accordance with Step Into Learning's safeguarding procedures.

Particular attention should be given where absence or disengagement is:

- unexplained;
- sudden or unusual;
- persistent or repeated;
- accompanied by other safeguarding concerns; or
- associated with changes in the child's circumstances or behaviour.

Step Into Learning will work with parents/carers, the Local Authority and other relevant agencies where necessary to identify and respond to safeguarding concerns.

12.4 Child-on-Child Abuse

Step Into Learning recognises that children can experience abuse from other children. Child-on-child abuse can take place in person or online and may include:

- bullying and cyberbullying
- physical abuse and violence
- sexual violence
- sexual harassment
- sharing or requesting sexual images
- abuse within intimate relationships
- coercive or controlling behaviour
- initiation or hazing-type violence
- discriminatory or prejudicial behaviour
- other forms of abuse or exploitation between children

Sexual violence and sexual harassment can occur between children of any age and may take place online, offline or across both environments. Staff must not dismiss child-on-child abuse as "banter", "just having a laugh", "part of growing up" or something that children should manage themselves.

All concerns about child-on-child abuse must be reported to the DSL/DDSL without delay and managed in accordance with Step Into Learning's safeguarding and child-on-child abuse procedures.

Where sexual violence or sexual harassment occurs, Step Into Learning will take the concerns seriously, support affected children and consider the needs of all children involved. Appropriate safeguarding action will be taken, including referral to external agencies where required.

Step Into Learning will maintain a zero-tolerance approach to abuse while ensuring that responses are proportionate, child-centred and based on the individual circumstances of each case.

13. Work Experience & Supported Internship Placements

Step Into Learning has arrangements in place to safeguard children and young people undertaking work experience, supported internships, volunteering or other work-based placements.

Before a child is placed with an employer or other placement provider, Step Into Learning will undertake appropriate safeguarding checks and due diligence on the placement provider and consider the nature of the placement, the activities the learner will undertake, the level of supervision and the potential safeguarding risks.

Step Into Learning will ensure that placement providers understand their safeguarding responsibilities and know how to respond to and report any safeguarding concerns relating to a learner. Step Into Learning will obtain appropriate assurances from the placement provider regarding the suitability of staff supervising learners and any required safeguarding or other checks. The level of safeguarding checks will be proportionate to the nature of the placement, the learner's age and circumstances, the activities undertaken and the level of supervision provided, in accordance with KCSIE 2026 and other relevant statutory guidance.

Step Into Learning will maintain appropriate oversight of learners undertaking placements and will provide learners with clear information about:

- expected standards of behaviour and conduct;
- how to recognise and report a safeguarding concern;
- who to contact at Step Into Learning if they have a concern;
- what to do if they feel unsafe or uncomfortable; and
- how to access support during their placement.

Any safeguarding concern arising during a work experience or supported internship placement must be reported to the Step Into Learning DSL/DDSL without delay and managed in accordance with this safeguarding policy.

Step Into Learning will maintain appropriate communication with placement providers and relevant professionals throughout the placement and will take action where safeguarding concerns arise, including ending or reviewing a placement where necessary to protect the learner.

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, and this is revisited through the academic year as part of their PSHE curriculum. Please refer to the Online and Digital Safety policy for further information on this area of safeguarding.

Step Into Learning will ensure learners understand the risks associated with generative artificial intelligence, including deepfake imagery, AI-generated sexual content, grooming and contact risks. Filtering and monitoring systems will be kept under review to address emerging AI-related risks. Staff will receive appropriate awareness training on AI-related safeguarding risks as part of their regular safeguarding updates.

15. Consensual and Non-Consensual Sharing of Nude and Semi-Nude Images and/or Videos

15.1 Step Into Learning recognises that children and young people may create, receive or share nude or semi-nude images and/or videos using mobile phones, social media, messaging services and other online platforms. KCSIE refers to this as the consensual and non-consensual sharing of nude and semi-nude images and/or videos, sometimes referred to as "sexting" or "youth produced sexual imagery".

15.2 Any nude or semi-nude image or video of a person under 18 may constitute an indecent image of a child. Making, possessing or distributing indecent images of children is illegal, including where the image has been created by the child themselves. However, incidents must be approached primarily as a safeguarding matter, with the

response being proportionate to the circumstances and needs of the child or young person.

15.3 Incidents may include, but are not limited to:

- a child or young person creating and sharing a nude or semi-nude image or video of themselves
- a child or young person sharing an image or video of another child or young person, either with or without their consent
- an image or video being shared more widely without the subject's consent;
- coercion, pressure, threats, blackmail or financial extortion to obtain or share an image
- an adult requesting, possessing, receiving or distributing an image or video involving a child
- an adult pretending to be a child or young person in order to obtain an image;
- grooming or sexual exploitation associated with the sharing of an image or video
- digitally manipulated or AI-generated nude or semi-nude images, including "deepfake" or "deep nude" imagery

15.4 All incidents must be treated as a safeguarding concern and reported to the Designated Safeguarding Lead (DSL) or Deputy DSL immediately. Staff must not attempt to investigate the incident themselves.

15.5 Staff must not:

- view, copy, print, download, save, store or forward the image or video
- ask the child or young person to send, show or download the image or video
- ask the child or young person to provide details about the content of the image
- share information about the incident unnecessarily with other staff, children, young people or parents/carers
- delete the image or ask the child or young person to delete it
- blame, shame or otherwise make the child or young person feel responsible for what has happened

If a member of staff inadvertently sees an image, they must report this to the DSL immediately and seek advice.

15.6 Staff should reassure the child or young person that the matter will be dealt with sensitively and that they will be supported. Staff should explain that they need to report the concern in accordance with safeguarding procedures and must not promise confidentiality.

15.7 The DSL will assess the circumstances and determine the appropriate safeguarding response, taking account of the child's age, understanding, wishes and feelings, the nature of the imagery, whether consent was present, whether there was pressure or coercion, whether the image has been distributed, and whether there are indications of abuse, exploitation, grooming or criminal activity.

Where an adult is involved in the creation, requesting, possession, receipt or distribution of sexual imagery involving a child, or where there are concerns that a child has been sexually abused, groomed or exploited, the DSL will consider an immediate referral to the police and/or children's social care, in accordance with local safeguarding arrangements.

15.8 The DSL will follow the current Department for Education guidance on sharing nudes and semi-nudes when determining the appropriate response. The response should be proportionate and should distinguish between incidents that are primarily safeguarding concerns involving children and incidents involving coercion, abuse, exploitation or adults.

15.9 Where appropriate, Step Into Learning will support a child or young person to report the removal of an image from online services. Children and young people may be supported to use appropriate reporting and image-removal services, including Childline and the Internet Watch Foundation's Report Remove service.

15.10 Step Into Learning will provide appropriate education and support to help children and young people understand the risks associated with creating and sharing nude or semi-nude images, including consent, coercion, online exploitation, permanence of digital content, image-based abuse and the risks associated with AI-generated or digitally manipulated imagery.

15.10 Upskirting

Upskirting involves taking a photograph or video under a person's clothing without their permission, typically with the intention of viewing their genitals or buttocks, with or without underwear, for sexual gratification or to cause humiliation, distress or alarm. It is a criminal offence and will be treated as a safeguarding concern.

Any concern relating to upskirting must be reported to the DSL/DDSL immediately. The DSL will consider the appropriate safeguarding, police and other agency response in accordance with the circumstances and relevant procedures.

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 adult at risk.

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 24 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 My Concern	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 Senior Management 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 Board of 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. Operation Encompass

Step Into Learning is part of Operation Encompass.

Operation Encompass is a national police and education early intervention safeguarding partnership which supports children who experience Domestic Abuse. Operation Encompass is in place in every police force in England and Wales, the Isle of Man, Jersey, Guernsey, Scotland, Northern Ireland and Gibraltar.

Children were recognised as victims of domestic abuse in their own right in the 2021 Domestic Abuse Act. There is a legislative requirement for police forces to share information with educational settings through Operation Encompass.

Through Operation Encompass the police will share information with Step Into Learning about ALL police attended domestic abuse incidents which involve any of our children who are related to either of the adults involved in the incident. This sharing of information will occur PRIOR to the start of the next college day. The notification will inform us about the context of the incident and will include the Voice of the Child.

Once a Key Adult (DSL) and their deputies (DDSLs) have completed the National Online Operation Encompass Key Adult training they will cascade the principles of Operation Encompass to all other staff. The following members of the Step Into Learning Safeguarding Team have undertaken the Key Adult Training:

Lucy Muldowney (DSL) 26th June 2026

Lesley Volz (DDSL) 27th July 2026

Malcolm Wake (DDSL) 16th July 2026

Siobhan Robbins (DDSL) 29th July 2026

Our parents are fully aware that we are an Operation Encompass college and we ensure that when a new child joins us the parents/carers are informed about Operation Encompass.

The Operation Encompass notification is stored in line with all other confidential safeguarding and child protection information.

21. Key Contacts

Step into Learning

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

Name	Lucy Muldowney
Telephone Number	07498540465
Email	lucy.muldowney@stepintolearning.org.uk

Deputy Designated Safeguarding Leads (DDSLs)

Name	Malcolm Wake
Telephone Number	07947 657861
Email	Malcolm.Wake@stepintolearning.org.uk

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

Name	Katie Williams-Connell
Telephone Number	07960573301
Email	Katie.Williams-Connell@stepintolearning.org.uk

Name	Lesley Volz
Telephone Number	07518863161
Email	Lesley.Volz@stepintolearning.org.uk

Nominated Trustee

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

Subcontractors

The Outdoor Place

Name	Tracy Coles
Email	tracy@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 Support & Safeguarding Hub (MASSH)
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/how-to-find-support-for-your-child-and-family/massh/

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/

