



# Safeguarding and Prevent Policy

Instep UK

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## Instep UK's Safeguarding Statement and Policy

This Policy has been developed to bring together the key principles of Safeguarding, The Prevent Duty, Equality and Diversity, Bullying and Health and Safety. Instep UK is fully committed to safeguarding the welfare of all by taking all reasonable steps to protect them from harm and accepts its corporate responsibility for the well-being and safety for its stakeholders including children and vulnerable groups. Instep UK recognises its responsibility and acknowledges that it is the duty of the workforce in its entirety to uphold British Fundamental Values and to safeguard the welfare of all stakeholders by creating an environment that protects them from harm and reduces any potential risks of being exposed to violence, extremism, exploitation or victimisation. Therefore colleagues, volunteers, delivery partners and contractors will always show respect and understanding for the rights, safety and welfare of all parties and conduct themselves in a way that reflects the principles, values and culture of our organisation and be aware and follow current legislation regarding the safeguarding of all stakeholders. Our policy sets out, in detail, the roles and responsibilities of all parties in providing a safe working and learning environment whereby everyone is protected from abuse of any kind. This policy has been agreed and is sponsored by the Instep UK Managing Director and Executive Management Team as of September 2019.

### Statement of intent

***All staff should be aware of the signs of abuse and neglect and maintain an attitude of 'it could happen here'!***

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## It is Instep UK's intention to:

Instep UK is committed to safeguarding and promoting the welfare, both physical and emotional, of every learner both inside and outside of the learning environment. We implement a whole-organisational preventative approach to managing safeguarding concerns, ensuring that the wellbeing of learners is at the forefront of all action taken.

This policy sets out a clear and consistent framework for delivering this promise, in line with safeguarding legislation and statutory guidance.

- Creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to children, young people and adults who may be vulnerable.
- Ensure that relevant employment and security checks are undertaken, as required and that staff and any new staff members and volunteers are only appointed when all the appropriate checks have been satisfactorily completed.
- Ensure that appropriate supervision is given where required.
- Teaching learners how to keep safe and recognise behaviour that is unacceptable.
- Identifying and making provision for any learner that has been subject to abuse.
- Take the necessary steps to inform all stakeholders of relevant policies and procedures and Code of Conduct
- Ensuring that members of the board and staff members understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child/adult abuse and know to refer concerns to the DSL.
- Ensure that colleagues are appropriately trained in safeguarding and to understand the risk of radicalisation, their role in implementing the Prevent Duty, and the impact this has on their job role and how to refer an individual who they feel is at risk.
- Ensure that all stakeholders are protected from abuse regardless of sex, race, disability, age, sexual orientation, religion or belief, gender reassignment, maternity or because someone is married or in a civil partnership.
- Regularly review and monitor Instep UK policies and procedures to ensure our legal, moral and social responsibilities are met.
- Take all suspicions and allegations of abuse including risks of radicalisation extremely seriously and to respond to concerns in a timely manner and with consideration.
- Work in partnership with and in accordance with organisations' procedures where required, including Designated Person in Local Authority, Safeguarding Children's Boards, Safeguarding Adults Boards and the Channel multi-agency panel.
- Comply with and maintain knowledge of all relevant legislation, codes of practice and appropriate guidance to any amendments to such.

- Have Designated Safeguarding Leads (DSL's) in place to advise on and manage any concerns and referrals made that have access to up-to-date training and current information/legislation.
- Ensure that all personal data will be processed in accordance with the requirements of the GDPR 2018.
- Ensure that personal information is confidential and should only be shared with the permission of the individual concerned (and or those with parental responsibility) unless the disclosure of confidential information is necessary to support a child or vulnerable adult from serious harm or promote their welfare. In all circumstances, information must be confined to those people directly involved in the professional work of each individual child or vulnerable adult and on a strict “need to know” basis.

## Definitions

Children are defined in the Children Act 1989 and 2004, as a person under the age of 18 years.

An adult at risk is ‘any person who is aged 18 years or over and at risk of abuse or neglect because of their needs for care and support’ (Care Act 2014 [England]).

A child or adult at risk may be a person who;

- Is a teenager
- Children and young people missing from education
- Those at risk of FGM (Female Genital Mutilation)
- Those at risk of Forced Marriage
- Those at risk of Honour Based Violence
- Trafficked children and young people
- Those in the ‘Looked after system’
- Children, young people and vulnerable adults living away from home
- Children and vulnerable adults from some minority ethnic groups
- Those with abuse & trauma in their past
- Those living in sheltered accommodation
- Detained in custody or under probation order
- Those living with domestic violence, parental substance misuse and/or parental mental ill health, receiving a service or participating in an activity targeted at older people, people with disabilities or with physical or mental health conditions
- Has a physical or sensory disability
- Is physically frail or has a chronic illness

- Has a mental illness or dementia
- Has a learning difficulty
- Misuses drugs and or alcohol
- Has social and or emotional issues
- Exhibits challenging behaviours

For the purposes of this policy, “safeguarding and protecting the welfare of children” is defined as:

- Protecting learners from maltreatment.
- Preventing the impairment of learners’ health or development.
- Ensuring that learners grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all learners to have the best outcomes.

For the purposes of this policy, the term “harmful sexual behaviour” includes, but is not limited to, the following actions:

- Using sexually explicit words and phrases
- Inappropriate touching
- Sexual violence or threats
- Full penetrative sex with other children or adults
- Upskirting

In accordance with the DfE’s guidance, ‘Sexual violence and sexual harassment between children in schools and colleges’ (2018), and for the purposes of this policy, the term “sexual harassment” is used within this policy to describe any unwanted conduct of a sexual nature, both online or offline, which violates a child’s dignity and makes them feel intimidated, degraded or humiliated, and can create a hostile, sexualised or offensive environment.

For the purpose of this policy, the term “sexual violence” encompasses the definitions provided in the Sexual Offences Act 2003, including those pertaining to rape, assault by penetration and sexual assault.

## Introduction

Instep UK believes that it is always unacceptable for a child or vulnerable adult to experience abuse or discrimination of any kind and recognises its responsibility to safeguard the welfare of all children and vulnerable adults by a commitment to practice which protects them. Instep UK have a commitment that no child or vulnerable adult will be treated less favourably than others in being able to access services

which meet their specific individual need, and this is linked to our Equality and Diversity Policy and social inclusion strategies.

This policy has been developed to describe the responsibilities of colleagues, volunteers, delivery partners and contractors for the recognition and prevention of abuse and to clarify the actions to take when abuse is suspected or identified. Therefore, the aim of this Policy is to ensure that Instep UK fulfils its responsibilities towards the protection, welfare and safety of children and vulnerable adults.

Abuse is the violation of an individual's human rights. It can be a single act or repeated acts. It can be physical, sexual or emotional. It also includes acts of neglect or an omission to act. Abuse can take many forms and is not acceptable in any way.

Instep UK will endeavour to safeguard children and vulnerable groups by:

- Valuing, listening to and respecting them.
- Adopting Policies, guidelines and a Code of Conduct and behaviour for colleagues, volunteers, delivery partners and contractors.
- Sharing information about concerns with agencies which need to know, and involving parents and children and vulnerable adults appropriately.
- Ensuring that the DBS (Enhanced), in accordance with their guidelines, checks all colleagues, volunteers, delivery partners and contractors with responsibilities for children and or vulnerable groups. This information is regularly checked and monitored via the Single Central Register which contains all colleague details.
- Recruiting colleagues and volunteers safely, ensuring all necessary checks are made in line with Safer Recruitment Policies and Procedures.
- Making all new colleagues, volunteers, delivery partners and contractors aware of our safeguarding policy and procedures.
- Providing all colleagues, volunteers, delivery partners and contractors with safeguarding training which is updated regularly.
- Ensuring that all children, vulnerable groups their parents and carers are aware of our Safeguarding policy and procedures.
- Ensuring all colleagues and stakeholders are aware of their role and responsibilities in relation to safeguarding.

Instep UK is committed to reviewing its policies and good practice annually unless there is a change to legislation including EU Directives with immediate effect or there has been a significant change within the organisation. The Head of Safeguarding, Prevent and Wellbeing is responsible for updating the policy with support from the Executive Management Team/ Board.

Instep UK operates a culture of openness and transparency and embeds the Principles of 'The 5R's' across all our services and ensure all colleagues, volunteers, delivery partners and contractors understand their responsibilities regarding Safeguarding.



## The 5 R's:

<b>Recognise</b>	the signs and indications of abuse
<b>Respond</b>	as soon as possible
<b>Record</b>	everything you have heard, was said or any actions seen
<b>Report</b>	ensure you report the concern/incident
<b>Refer</b>	to the Designated Safeguarding Lead (DSL)

## Legal Framework

The Children Act 1989 placed a duty on local authorities to investigate situations where a child is at risk of significant harm. Schools, Colleges and Providers had a legal obligation to work with investigating agencies acting on behalf of children in need. Guidance was published in 'Safeguarding Children in Education' (2004). It set out the requirements to provide a safe learning environment, identify young people suffering, or likely to suffer, significant harm and take appropriate action in full partnership with other local agencies. It encompassed wider issues such as health, safety, drug/substance abuse and bullying as well as the contribution made to safeguarding in relation to individual children, and underpinned our common law duty of care.

This was replaced and extended in January 2007 by 'Safeguarding Children and Safer Recruitment in Education', which includes more specific guidance (including some statutory requirements) relating to the recruitment and vetting of colleagues. The responsibility for making sure appropriate arrangements are in place lies with Instep UK. Colleagues are responsible for carrying out their duties in compliance with the arrangements set out by Instep UK, we are not the investigating agency. This function is carried out by local authority Children's Services, or other agencies with statutory powers. The Children Act 1989, and subsequent legislation and guidance, are concerned with the emotional, physical or sexual abuse or neglect of children, defined as under the age of 18. However, it is recognised that children acquire degrees of legal capacity (for example, the ability to give informed consent) and maturity prior to their 18th birthday, and that there are adults over 18 who continue to be vulnerable due to a learning difficulty and/or disability.

This policy has been created with due regard to all relevant legislation including, but not limited to, the following:

## Legislation

- Children Act 1989
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Sexual Offences Act 2003

- [New for 2018] General Data Protection Regulation (GDPR)
- Data Protection Act 2018
- The Care Act 2014
- The Mental Capacity Act 2005
- Equality Act 2010
- Protection of Freedoms Act 2012
- UN Convention on the Rights of the Child 1991

## Statutory Guidance

- HM Government (2013) 'Multi-agency practice guidelines: Handling cases of Forced Marriage'
- DfE (2018) 'Working Together to Safeguard Children'
- DfE (2015) 'The Prevent duty'
- DfE (2019) 'Keeping children safe in education'
- DfE (2018) 'Disqualification under the Childcare Act 2006'

## Non-statutory Guidance

- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2018) 'Information sharing'
- DfE (2017) 'Child sexual exploitation'
- DfE (2018) 'Sexual violence and sexual harassment between children in schools and colleges'
- Advice for practitioners providing safeguarding services to children, young people, parents and carers 2015
- The "No Secrets" guidance which sets out a code of practice for the protection of vulnerable adults

## Our commitment

- We believe that a child or vulnerable adult should never experience abuse of any kind.
- We promote the welfare of all children and vulnerable adults and to keep them safe.
- We are committed to practice in a way that protects them.
- We will protect learners from radicalisation and extremism, by responding swiftly where learners are vulnerable to these issues.
- We protect children and vulnerable adults who receive our services. This includes the children of adults who use our services and any siblings of learners.
- We will provide colleagues and volunteers with regular updates and annual training on Safeguarding and Prevent using the resources provided by the Education and Training Foundation.
- We will record and check the details of all visitors to all our premises.

## Aims

### Our aims are to:

- Promote British Fundamental values, including freedom of speech, rights to be safe and listened to, by creating an environment that encourages young people and vulnerable adults to raise any concerns.
- Encourage learners to develop a sense of autonomy and independence in their learning and development.
- Enable young people/vulnerable adults to have the self- confidence and the vocabulary to resist inappropriate approaches.
- Work with employers to build their understanding of and commitment to the principles of safeguarding and prevent duty.
- Liaise with other statutory agencies to ensure legislative procedures are current.

### Safeguarding at Instep UK is:

- Protecting children and vulnerable adults from maltreatment.
- Preventing impairment of children's and vulnerable adults' health or development.
- Ensuring that children and vulnerable adults are growing up in circumstances consistent with the provision of safe and effective care.
- Acting to enable all children and vulnerable adults to have the best life-chances. Instep UK operates on a 3-tier threshold when defining a safeguarding risk from red, amber to green when recording concerns on the Safeguarding Register, this risk is constantly reviewed.

## Significant Harm

- Harm means ill treatment or the impairment of health or development, including impairment suffered from seeing or hearing the ill treatment of another.
- Development means physical, intellectual, emotional, social or behavioural development.
- Health means physical or mental health.
- Ill treatment includes physical & sexual abuse and forms of ill treatment which are not physical. (s.31 (9) Children Act 1989 as amended by the Adoption and Children Act 2002)

## Welfare

Welfare is defined as a child or vulnerable adult in need of universal help from those already involved or from a single or multiple agency response.

## Missing from Education

Children and young people and vulnerable adults who go missing from education will fail to achieve their full potential academically and fail to achieve economic wellbeing in later life. They are also at a greater risk of physical harm, self-inflicted or inflicted by others, being sexually exploited and becoming involved in crime and anti-social behaviour, being employed illegally or abusing drugs and alcohol. In line with the duty under section 10 of the Children Act 2004, Instep UK must take reasonable steps to monitor learners' attendance through a daily register. This is also completed for vulnerable adults. Attendance should be monitored closely, and poor or irregular attendance should be addressed. Please see Missing from Education Policy or more information.

## Definitions and Indicators of Abuse

Abuse, including neglect, is a form of maltreatment of a child or adult at risk (often called a vulnerable adult). In relation to adults the terminology 'serious harm' is frequently used within the guidance rather than 'significant harm' which is a term from the Children Act 1989. Someone may abuse a child or vulnerable adult by inflicting harm, or by failing to act to prevent harm. Children and vulnerable adults may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger for example via the internet. They may also be abused by an adult or adults, or by another child or children.

Working Together to Safeguard Children 2018 defines four types of abuse; physical, emotional, sexual and neglect. Vulnerable groups may also be subjected to these forms of abuse therefore the wording from Working Together to Safeguard Children 2018 has been slightly altered to reflect this fact. Adults may also be subjected to financial, discriminatory and institutional abuse and colleagues should be familiar with indicators for all forms of abuse.

## Physical Abuse

Physical Abuse: this may involve	Signs: this may include
<ul style="list-style-type: none"> <li>○ Hitting</li> <li>○ Shaking</li> <li>○ Throwing</li> <li>○ Poisoning</li> <li>○ Burning or Scalding</li> <li>○ Drowning</li> <li>○ Suffocating or otherwise causing Physical Harm</li> </ul> <p><b>Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately indicates illness in a child, young person or vulnerable adult</b></p>	<ul style="list-style-type: none"> <li>○ Unexplained bruises, marks or injuries on any part of the body</li> <li>○ Frequent visits to the GP or A&amp;E</li> <li>○ An injury consistent with the explanation offered</li> <li>○ Fear of parents or carers being approached for an explanation</li> <li>○ Aggressive behaviour or severe temper outbursts</li> <li>○ Flinching when approached</li> <li>○ Reluctance to get changed or wearing long sleeves in hot weather</li> <li>○ Depression</li> <li>○ Withdrawal behaviour or other behaviour change</li> <li>○ Running away from home/residential care</li> <li>○ Distrust of adults, particularly those with whom a close relationship would normally be expected</li> </ul>

## Emotional Abuse

Emotional abuse is the persistent maltreatment of a child or vulnerable adult such as to cause severe and persistent adverse effects on the child's or vulnerable adult's emotional development.

Emotional Abuse: this may involve	Signs: this may include
<ul style="list-style-type: none"> <li>○ Conveying to the child or vulnerable adult that they are worthless and unloved</li> <li>○ That they are inadequate, or valued only insofar as they meet the needs of another person</li> <li>○ Not giving the child or vulnerable adult opportunities to express their views</li> <li>○ Deliberately silencing them</li> <li>○ Making fun of what they say or how they communicate</li> <li>○ Age or developmentally inappropriate expectations being imposed on the child or vulnerable adult</li> <li>○ Interactions that are beyond the developmental capability</li> <li>○ Overprotection and limitation of exploration and learning</li> <li>○ Preventing the child or vulnerable adult participating in normal social interaction</li> <li>○ Seeing or hearing the ill-treatment of another child or vulnerable adult</li> <li>○ Serious bullying (including cyber bullying)</li> <li>○ Causing children or vulnerable adults frequently to feel frightened or in danger</li> <li>○ Exploitation or corruption of children or vulnerable adults</li> </ul>	<ul style="list-style-type: none"> <li>○ A failure to thrive or grow</li> <li>○ Sudden speech disorders</li> <li>○ Developmental delay, either in terms of physical or emotional progresses</li> <li>○ Behavioural change</li> <li>○ Being unable to play or socialise with others</li> <li>○ Fear of making mistakes</li> <li>○ Self-harm</li> <li>○ Fear of parent or carer being approached regarding their behaviour</li> <li>○ Confusion</li> <li>○ Use of inappropriate language, possession of violent, extremist literature, behavioural changes, the expression of extremist views, advocating violent actions and means, association with known extremists, seeking to recruit others</li> </ul>
<p><b>Some level of emotional abuse is involved in all types of maltreatment of a child or vulnerable adult though it may occur alone.</b></p>	

## Sexual Abuse

Sexual Abuse: this may involve	Signs: this may include
<ul style="list-style-type: none"> <li>○ Forcing or enticing a child/ren or vulnerable adult/s to take part in sexual activities, not necessarily involving a high level of violence, whether the child or vulnerable adult is aware of what is happening</li> <li>○ Physical contact including assault by penetration (for example rape or oral sex)</li> <li>○ Non-penetrative acts such as masturbation</li> <li>○ Kissing</li> <li>○ Rubbing and Touching outside of clothing</li> <li>○ They may also include non-contact activities, such as involving children or vulnerable adults in looking at, or in the production of, pornographic material or watching sexual activities</li> <li>○ Encouraging children to behave in sexually inappropriate ways</li> <li>○ Grooming a child in preparation for abuse (including via the internet)</li> <li>○ Upskirting' is now a criminal offence. <ul style="list-style-type: none"> <li>○ A definition has been included which describes upskirting as, "taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm" (DfE, 2019a)</li> </ul> </li> </ul> <p><b>Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.</b></p>	<ul style="list-style-type: none"> <li>○ Pain or itching in the genital/anal areas</li> <li>○ Bruising or bleeding near genital/anal areas</li> <li>○ Sexually transmitted diseases</li> <li>○ Vaginal discharge or infection</li> <li>○ Stomach pains</li> <li>○ Discomfort when walking or sitting down</li> <li>○ Pregnancy</li> <li>○ Sudden or unexplained changes in behaviour e.g. becoming aggressive or withdrawn</li> <li>○ Fear of being left with a specific person or group of people</li> <li>○ Nightmares</li> <li>○ Leaving home</li> <li>○ Sexual knowledge which is beyond their age or developmental age</li> <li>○ Sexual drawings or language</li> <li>○ Bedwetting</li> <li>○ Saying they have secrets they cannot tell anyone about</li> <li>○ Self-harm or mutilation, sometimes leading to suicide attempts</li> <li>○ Eating problems such as overeating or anorexia</li> </ul>

## Neglect

This is the persistent failure to meet a child's or vulnerable adults basic physical and or psychological needs, likely to result in the serious impairment of the child's or vulnerable adult's health or development.

<b>Abuse by Neglect: this may involve</b>	<b>Signs: this may include</b>
<ul style="list-style-type: none"> <li>○ Neglect may occur during pregnancy because of material substance abuse</li> <li>○ A parent or carer failing to provide adequate food, clothing and shelter</li> <li>○ Exclusion from home or abandonment</li> <li>○ Failure to protect a child or vulnerable adult from physical harm or danger failure</li> <li>○ To ensure adequate supervision</li> <li>○ Failure to use adequate care takers</li> <li>○ Failure to ensure access to appropriate medical care or treatment</li> <li>○ Neglect of, or unresponsiveness to a child's or vulnerable adult's basic emotional needs.</li> </ul>	<ul style="list-style-type: none"> <li>○ A constant hunger, sometimes stealing food from others</li> <li>○ Dirty or smelly</li> <li>○ Loss of weight, or being constantly underweight</li> <li>○ Inappropriate dress for the weather</li> <li>○ Complaining of being tired all the time</li> <li>○ Not requesting medical assistance and</li> <li>○ failing to attend appointments</li> <li>○ Having few friends</li> <li>○ Worsening health conditions</li> <li>○ Pressure sores</li> <li>○ Mentioning their being left alone or unsupervised</li> <li>○ Sore or extreme nappy rash</li> <li>○ Skin infections</li> <li>○ Mentioning their being left alone or unsupervised</li> <li>○ Sore or extreme nappy rash</li> <li>○ Lack of response to stimuli or contact</li> <li>○ Poor skin condition(s)</li> <li>○ Frozen watchfulness</li> <li>○ Anxiety</li> <li>○ Distressed</li> <li>○ Child moves away from parent under stress</li> <li>○ Little or no distress when separated from primary carer</li> <li>○ Inappropriate emotional responses</li> <li>○ Language delay.</li> </ul>



## Financial Abuse

Financial Abuse: this may involve	Signs: this may include
<ul style="list-style-type: none"> <li>○ Being overcharged for services</li> <li>○ Being tricked into receiving goods or services that they do not want or need</li> <li>○ Inappropriate use, exploitation, or misappropriation of property and or utilities</li> <li>○ Theft</li> <li>○ Deception</li> <li>○ Fraud</li> <li>○ Explanation or pressure relating to wills</li> </ul>	<ul style="list-style-type: none"> <li>○ Lack of basic requirements e.g. food, clothes or shelter</li> <li>○ Inability to pay bills</li> <li>○ Unexplained withdrawals from accounts</li> <li>○ Inconsistency between standard of living and income</li> <li>○ Reluctance to take up assistance which is needed</li> <li>○ Unusual interest by family or other people in the persons assets</li> <li>○ Recent changes in deeds</li> <li>○ Power of Attorney obtained when person lacks capacity to make the decision.</li> </ul>

## Institutional Abuse

Institutional Abuse: this may involve	Signs: this may include
<ul style="list-style-type: none"> <li>○ Service users required to fit in excessively to the routine of the service</li> <li>○ More than one individual are neglected</li> <li>○ Everyone is treated in the same way</li> <li>○ Other forms of abuse on an institutional scale.</li> </ul>	<ul style="list-style-type: none"> <li>○ Inflexible daily routines, e.g. set bedtimes and or deliberate waking</li> <li>○ Dirty clothing and bed linen</li> <li>○ Lack of personal clothing and possessions</li> <li>○ Inappropriate use of nursing and medical procedures</li> <li>○ Lack of individualised care plans and failure to comply with care plans</li> <li>○ Inappropriate use of power, control, restriction and confinement</li> <li>○ Failure to access health care, dentistry services, etc.</li> <li>○ Inappropriate use of medication</li> <li>○ Misuse of residents' finances or communal finances</li> <li>○ Dangerous moving or handling practices</li> <li>○ Failure to record incidents or concerns.</li> </ul>

## Recognition of Abuse, including Neglect or Bullying

Recognising abuse is not easy, and it is not the responsibility of colleagues, volunteers, delivery partners and contractors to decide whether abuse has taken place or if there is significant risk. We do however have a responsibility to act if we think it may be happening.

Abuse, including neglect, includes forms of maltreatment of a child or vulnerable adult. Somebody may abuse a child or vulnerable adult by inflicting harm, by failing to act to prevent harm. Children and vulnerable adults may be abused in a family or in an institutional or community setting; by those known to them or, more rarely, by a stranger for example via the internet. They may also be abused by an adult or adults, or by another child or children.

- All members of staff will be aware of the indicators of peer-on-peer abuse, such as those in relation to bullying, gender-based violence, sexual assaults and sexting.
- All staff will be aware of the necessary procedures to follow to prevent peer-on-peer abuse, as outlined in Instep UK's Anti-Bullying Policy.
- All staff will be aware of the behaviours linked to drug taking, alcohol abuse, truancy and sexting, and will understand that these put learners in danger.

- Staff members will be aware of the effects of a learners' witnessing an incident of abuse, such as witnessing domestic violence at home.

**Bullying and Harassment** - Bullying can include a variety of behaviours from one individual/ group to another individual/ group such as name calling, offensive language, coercion, hitting, pushing, theft or damage to belongings, cyber, spreading harmful messages, hate crime or mate crime which is befriending someone with the intent to exploit them in some way. Please refer to Instep UK's Anti-Bullying Policy for further detail.

**e-Safety** - The safe and responsible use of technology, is sometimes presented as primarily a child or vulnerable adult protection issue. While children, young people and vulnerable adults do need support to keep themselves safe online the risks associated with the use of technology. Examples include the mismanagement of personal data, risks of financial scams, identity theft, cyber bullying, grooming, and radicalisation. Please refer to Instep UK's e-Safety and Internet Policies for further detail.

**Use of equipment** – Instep UK's IT equipment (including computers, laptops, mobile phones, notebooks, etc.) must not be used to view, download, create or share (with colleagues or children/ adults) illegal content including abusive images of children or young people).

**Risk to self and/or others** - This may include but is not exclusive to self- harm, suicidal tendencies or potential risk of harming others, which may or may not include children. This may be because of an individual experiencing a significant level of personal, emotional trauma and/or stress.

**Domestic Violence** - can be physical, emotional, sexual, neglect. This category also covers Forced Marriages and honour-based violence. Some learners may experience issues with drugs or alcohol to self-medicate or via dependence.

**Female Genital Mutilation (FGM)** - Victims of FGM are likely to come from a community that is known to practice FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

The FGM mandatory reporting duty is a legal duty provided for in the FGM Act 2003 (as amended by the Serious Crime Act 2015). The legislation requires colleagues to report where, during their professional duties, they either are informed by a girl under 18 that an act of FGM has been carried out on her, observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purpose with labour or birth. For the purposes of the duty, the relevant age is the girl's age at the time of disclosure/identification of FGM (i.e. it does not apply where a woman aged 18 or over discloses she had FGM when she was under 18).

**Forced Marriage** - One or both spouses do not consent to the marriage or consent is extracted under duress. Duress includes both physical and emotional pressure. A clear distinction must be made between a forced marriage and an arranged marriage. In arranged marriages, the families of both spouses take a leading role in choosing the marriage partner but the choice whether to accept the arrangement remains with the young people.

Any indications that children or vulnerable adults may be subjected to FGM or Forced Marriage, or that this may have already taken place, will be dealt with under the procedures outlined in this policy. In support of this provision Instep UK will do everything that it can to ensure that:

- The DSL's are aware of the issues surrounding FGM and Forced Marriage.

- Advice and signposts are available for accessing additional support e.g. the NSPCC's helpline. ChildLine services, Forced Marriage Unit.
- Awareness raising about FGM and Forced Marriage is incorporated in Instep UK's safeguarding training.

Where there are concerns about FGM or Forced Marriage, a referral must be made as a matter of urgency. It is also extremely important that if a child or vulnerable adult has disclosed that they are at risk of FGM or Forced Marriage, the case is referred to Social Care even if it is against that person's wishes. Instep UK colleagues must NOT consult or discuss these concerns with the child or vulnerable adult's parents or family or others within the community. If there is an imminent risk e.g. the child or vulnerable adult being taken out of the country, police must be informed (999) and the safety of the child or vulnerable adult whilst awaiting the police response must be the prime consideration.

**Modern slavery** - Encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

**Risks/ abuse related to family/cultural belief/ faith** - It is important to remember that many children and vulnerable adults are a part of a family. Some families have certain values and beliefs that can cause harm to a child or vulnerable adult. An example of this can include strong beliefs or a sense of honour or shame that can prevent people from seeking or accepting the help they need. A strong cultural or religious belief in the sanctity of marriage may dissuade people from leaving their partners, even if they are violent. In addition, many religions and cultures have strong beliefs around sex outside marriage, making it very hard for young, unmarried, pregnant women to get the help they need. Differences in culture or religion between partners, or between parents and children, may also make it more difficult for individuals to understand and support each other. Where one partner perceives their faith and heritage to be superior to, or more important than, their partner's it can lead to a power imbalance and an erosion of the other partner's self-esteem. In extreme cases children who are perceived as "disobedient" or "different" are believed to be possessed by a spirit controlling their behaviour. The children can be physically and emotionally abused to exorcise the spirit.

**Parental Impacts** - The issues of parents and carers can have a significant impact upon a child or vulnerable adult's wellbeing. Some issues can include Substance Misuse, Mental Health and Domestic Abuse. It is also important to note that some children and vulnerable adults also misuse drugs or alcohol when experiencing trauma in their own lives and they may require support around both factors. It is fundamental that wherever a concern is held for a child or vulnerable adult that confidentiality is respected however if the concern must involve the parent or carer for safeguarding reasons then it is good practice to work together and inform parents or carers of any referrals that may have to be made to support services.

**Homelessness** The DSL and deputy(s) will be aware of the contact details and referral routes in to the Local Housing Authority so that concerns over homelessness can be raised as early as possible. Indicators that a family may be at risk of homelessness include the following:

- Household debt
- Rent arrears
- Domestic abuse

- Anti-social behaviour
- Any mention of a family moving home because “they have to”

Referrals to the Local Housing Authority do not replace referrals to MASH/ CSCS where a child is being harmed or at risk of harm. For 16- and 17-year-olds, homelessness may not be family-based and referrals to CSCS will be made as necessary where concerns are raised.

**County lines criminal activity** - For the purpose of this policy, “**County lines criminal activity**” refers to drug networks or gangs grooming and exploiting children to carry drugs and money from urban areas to suburban areas, rural areas and market and seaside towns.

Staff will be made aware of children with missing episodes who may have been trafficked for the purpose of transporting drugs. Staff members who suspect a child may be vulnerable to, or involved in, this activity will immediately report all concerns to the DSL.

The DSL will consider referral to the National Referral Mechanism on a case-by-case basis. Indicators that a pupil may be involved in county lines active include the following:

- Persistently going missing or being found out of their usual area
- Unexplained acquisition of money, clothes or mobile phones
- Excessive receipt of texts or phone calls
- Relationships with controlling or older individuals or groups
- Leaving home without explanation
- Evidence of physical injury or assault that cannot be explained
- Carrying weapons
- Sudden decline in school results
- Becoming isolated from peers or social networks
- Self-harm or significant changes in mental state.
- Parental reports of concern.

**Pupils with family members in prison** – Learner’s with a family member in prison will be offered pastoral support as necessary. They will receive a copy of [‘Are you a young person with a family member in prison’](#) from Action for Prisoners’ Families where appropriate and allowed the opportunity to discuss questions and concerns.

**Learners required to give evidence in court** – Learner’s required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support. Learners will also be provided with the booklet [‘Going to Court’](#) from HM Courts and Tribunals Service (HMCTS) where appropriate and allowed the opportunity to discuss questions and concerns.

**Contextual safeguarding** - Safeguarding incidents can occur outside of Instep UK and can be associated with outside factors. All staff, particularly the DSL and their deputy(s), will always consider the context of incidents – this is known as contextual safeguarding. Assessment of learners' behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare. Instep UK will provide as much contextual information as possible when making referrals to MASH (CSCS).

### **Learners with SEND**

Instep UK recognises that learners with SEND can face additional safeguarding challenges and understands that further barriers may exist when determining abuse and neglect in this group of learners.

Staff will be aware of the following:

- Certain indicators of abuse, such as behaviour, mood and injury, may relate to the learner's disability without further exploration; however, it should never be assumed that indicators relate only to their disability
- Learners' with SEND can be disproportionately impacted by things like bullying, without outwardly showing any signs
- Communication barriers may exist, as well as difficulties in overcoming these barriers
- When reporting concerns or making referrals for learner's with SEND, the above factors will always be taken into consideration.
- When managing a safeguarding issue relating to a pupil with SEND, the DSL will liaise with the learner's family where appropriate, to ensure that the learner's needs are effectively met.

**Private fostering** - Where Instep UK becomes aware of a learner being privately fostered or a learner privately fostering, they will notify the LA as soon as possible to allow the LA to conduct any necessary checks.

**Serious crime** - The guidance sets out what school and college staff should look out for:

"All staff should be aware of indicators, which may signal that learners are at risk from, or are involved with serious violent crime.

These may include increased absence, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in well-being, or signs of assault or unexplained injuries.

Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with individuals associated with criminal networks or gangs" (DfE, 2019a)

All staff will be made aware of the associated risks and understand the measures in place to measure these. Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang involvement and its criminal exploitation of children and vulnerable adults: county lines guidance." (DfE, 2019a).

## Allegations of abuse against other pupils (peer-on-peer abuse)

**Sexual harassment** - Sexual harassment refers to unwanted conduct of a sexual nature that occurs online or offline. Sexual harassment violates a learner's dignity and makes them feel intimidated, degraded or humiliated, and can create a hostile, sexualised or offensive environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence.

Sexual harassment includes:

- Sexual comments.
- Sexual "jokes" and taunting.
- Physical behaviour, such as deliberately brushing against another pupil.
- Online sexual harassment, including non-consensual sharing of images and videos and consensual sharing of sexual images and videos (often known as sexting), inappropriate comments on social media, exploitation, coercion and threats – online sexual harassment may be isolated or part of a wider pattern.

**Sexual violence** - Sexual violence refers to the three following offences:

- Rape: A person (A) commits an offence of rape if he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.
- Assault by Penetration: A person (A) commits an offence if s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
- Sexual Assault: A person (A) commits an offence of sexual assault if s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

**Harmful sexual behaviours** - The term is used to describe behaviour that is problematic, abusive and violent, and that may cause developmental damage. Harmful sexual behaviour may include:

- Using sexually explicit words and phrases.
- Inappropriate touching.
- Sexual violence or threats.
- Full penetrative sex with other children or adults.
- Sexual interest in adults or children of very different ages to their own.
- Forceful or aggressive sexual behaviour.
- Compulsive habits.
- Sexual behaviour affecting progress and achievement.

- Using sexually explicit words and phrases.
- Inappropriate touching.
- Sexual violence or threats.

Sexual behaviour can also be harmful if one of the children is much older (especially where there is two years or more difference, or where one child is pre-pubescent and the other is not) and where the child may have SEND.

**Upskirting - is** now a criminal offence. A definition has been included which describes upskirting as, “taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm” (DfE, 2019a). Where Instep UK becomes aware of a learner either being a perpetrator or victim of ‘upskirting’ this will be reported to the police.

### **A preventative approach**

In order to prevent peer-on-peer abuse and address the wider societal factors that can influence behaviour, the Instep UK will educate learners about abuse, its forms and the importance of discussing any concerns.

Instep UK will also ensure that learners are taught about safeguarding, including online safety, as part of a broad and balanced curriculum. Such content will be age and stage of development specific, and tackle issues such as the following:

- Healthy relationships
- Respectful behaviour
- Gender roles, stereotyping and equality
- Body confidence and self-esteem
- Prejudiced behaviour
- That sexual violence and sexual harassment is always wrong
- Addressing cultures of sexual harassment

### **Awareness**

All staff will be aware that learners of any age and sex are capable of abusing their peers and will never tolerate abuse as “banter” or “part of growing up”.

- All staff will be aware that peer-on-peer abuse can be manifested in many different ways, including sexting and gender issues, such as girls being sexually touched or assaulted, and boys being subjected to hazing/initiation type of violence which aims to cause physical, emotional or psychological harm.
- All staff will be made aware of the heightened vulnerability of learners with SEND, who are three times more likely to be abused than their peers. Staff will not assume that possible indicators of abuse relate to the pupil’s SEND and will always explore indicators further.



- LGBTQ+ learners can be targeted by their peers. In some cases, learners who are perceived to be LGBTQ+, whether they are or not, can be just as vulnerable to abuse as LGBTQ+ learners.
- Instep UK's response to boy-on-boy and girl-on-girl sexual violence and sexual harassment will be equally as robust as it is for incidents between children of the opposite sex.
- Learners will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers.

#### **Support available if reports include online behaviour**

- Online concerns can be especially complicated. The school recognises that there is potential for an online incident to extend further than the local community and for a victim, or the alleged perpetrator, to become marginalised and excluded both online and offline. There is also strong potential for repeat victimisation if the content continues to exist.
- If the incident involves sexual images or videos held online, the [Internet Watch Foundation](#) will be consulted to have the material removed.
- Staff will not view or forward illegal images of a child. If they are made aware of such an image, they will contact the DSL.

## **The Prevent Duty**

In 2010, the Government published the Prevent Strategy. This raised an awareness of the specific need to safeguard children, young people and families from violent extremism. Please refer to Instep UK's Prevent Duty Statement.

Extremist groups have attempted to radicalise vulnerable children and young people to hold extreme views including views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.

Prevent is about Safeguarding our learners to keep them both safe and within the law. The Prevent Duty is not about preventing learners from having political and religious views and concerns but about supporting them to use those concerns or act on them in non-extremist ways.

**Radicalisation & Extremism** - The holding of extreme political or religious views e.g. animal welfare rights, environmentalists, EDL / white supremacy groups, anti-gay groups, Islam / Christian ideology. The Counter Terrorism and Security Act, places a duty on specified authorities, including local authorities and childcare, education and other children's services providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism. ("The Prevent duty")

The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people, to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation.

Instep UK is clear that this exploitation and radicalisation should be viewed as a safeguarding concern and that protecting children from the risk of radicalisation is part of the company's safeguarding duty.

**Radicalisation** refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism. Learners may become susceptible to radicalisation through a range

of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that colleagues can recognise those vulnerabilities.

**Extremism** is defined by the Government in the Prevent Strategy as:

Vocal or active opposition to British Fundamental values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

## Responding to suspicions of radicalisation and extremism

We are alert to changes in a learner's behaviour or attitude which could indicate that they need help or protection.

- When any colleague has concerns that a learner may be at risk of radicalisation or involvement in terrorism, they should speak with the Designated Safeguarding Lead/ Head of Safeguarding, Prevent and Wellbeing for investigation and action.
- Disclosure records are held by the Designated Safeguarding Lead/ Head of Safeguarding, Prevent and Wellbeing and stored on a secure server.
- Colleagues take care not to influence the outcome either through the way they speak to or question children/vulnerable adults.
- We will continue to welcome the learner whilst investigations are being made. The learner may choose to withdraw from learning activities whilst investigations take place.
- We follow the procedures as set by the Local Safeguarding Board in relation to the delivery of services' and designated roles and tasks in supporting the learner, family, and employer subsequent to any investigation.
- All suspicions and investigations are kept confidential and shared only with those who need to know. Any information is shared under the guidance of the Local BIS Prevent Coordinator.

Numerous factors can contribute to and influence the range of behaviours that are defined as violent extremism, but most young people do not become involved in extremist action. For this reason, the appropriate interventions in any case may not have any specific connection to the threat of radicalisation, for example they may address mental health, relationship or drug/alcohol issues.

## Channel

Channel is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist related activity. It is led by the regional Police Counter-Terrorism Unit, and it aims to:

- Establish an effective multi-agency referral and intervention process to identify vulnerable individuals.
- Safeguard individuals who might be vulnerable to being radicalised, so that they are not at risk of being drawn into terrorist-related activity.

- Provide early intervention to protect and divert people away from the risks they face and reduce vulnerability.

The Channel programme focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's participation in the programme is entirely voluntary at all stages.

Independent Training Providers have a duty to cooperate with the Channel programme in the carrying out of its functions, and with the Police in providing information about an individual who is referred to Channel (Section 38, Counter Terrorism and Security Act 2015).

*Further guidance about duties relating to the risk of radicalisation is available in the Prevent Duty Guidance for FE. Please also refer to our Prevent Duty Statement.*

## Recognition of vulnerability factors can include:

- Identity Crisis – the learner is distanced from their cultural / religious heritage and experiences discomfort about their place in society.
- Personal Crisis – the learner may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging.
- Personal Circumstances – migration; local community tensions; and events affecting the learner's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
- Unmet Aspirations – the learner may have perceptions of injustice; a feeling of failure.
- Rejection of civic life.
- Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration.
- Special Educational Need – learners may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

## More critical risk factors could include:

- Being in contact with extremist recruiters.
- Accessing violent extremist websites, especially those with a social networking element.
- Possessing or accessing violent extremist literature.

- Using extremist narratives and a global ideology to explain personal disadvantage.
- Justifying the use of violence to solve societal issues.
- Joining or seeking to join extremist organisations.
- Significant changes to appearance and / or behaviour.
- Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

## Building learners' resilience

Instep UK will:

- Provide a safe environment for debating controversial issues.
- Promote fundamental British values, alongside pupils' spiritual, moral, social and cultural development.
- Allow pupils time to explore sensitive and controversial issues.
- Provide pupils with the knowledge and skills to understand and manage potentially difficult situations, recognise risk, make safe choices and recognise where pressure from others threatens their personal safety and wellbeing.
- Equip pupils to explore political and social issues critically, weigh evidence, debate, and make reasoned arguments.
- Teach pupils about how democracy, government and law making/enforcement occur.
- Teach pupils about mutual respect and understanding for the diverse national, regional, religious and ethnic identities of the UK. Resources

Instep UK will utilise the following resources when preventing radicalisation:

- Local safeguarding arrangements
- Local police (contacted via 101 for non-emergencies)
- The DfE's dedicated helpline (020 7340 7264)
- The Channel awareness programme
- The Educate Against Hate website

## Allegations Against Colleagues

Instep UK recognises that whilst most colleagues and volunteers who work with children and vulnerable adults are committed to their wellbeing and care there exists a range of abuse perpetrated by workers that despite the best efforts and interventions can still take place.

- An allegation may relate to a colleague including a volunteer who works with children who has behaved in way that has harmed a child, or may have harmed a child, possibly committed a criminal offence against or related to a child or behaved towards a child or children in way that indicates they may pose a risk of harm to children.
- We ensure that all learners and employers know how to complain about colleagues, which may include an allegation of abuse or neglect of statutory duties.
- We follow the guidance of the Local Safeguarding Board when responding to any complaint that a member of colleagues or volunteer has abused a learner.
- Each Manager knows that the Designated Safeguarding Lead/ Head of Safeguarding, Prevent and Wellbeing is to be made aware immediately of any allegation or complaint against a colleague or volunteer.
- We respond to any disclosure by learners or employers that abuse by a colleague may have taken, or is taking place, by first recording the details of any such alleged incident on an incident form.
- We refer any such complaint immediately to the Local Authority's Designated Officer (LADO) to investigate.
- We co-operate entirely with any investigation carried out by the local authority and police.
- Disclosure and Barring Service liaison (DBS).

## Abuse of a position of trust

Instep UK recognises that our colleagues, volunteers, delivery partners and contractors are in a position of trust with our learners in our care whether children, young people or vulnerable adults and acknowledge that it could be considered a criminal offence to abuse that trust. Broadly speaking, a relationship of trust can be described as one in which one party is in a position of power or influence over the other by virtue of their work or the nature of their activity. It is vital that for all of those in positions of trust to understand the power this can give them over those they care for and the responsibility.

Instep UK acknowledge the principle of equality embedded into the legislation of the Sexual Offenders Act 2003 applies irrespective of sexual orientation, neither homosexual or heterosexual relationships are acceptable within a position of trust.

We recognise that the legislation is intended to protect young people who are over the age of consent but under the age of 18 years.

Instep UK recognises the importance that its colleagues, volunteers, delivery partners and contractors protect the rights and needs of all children, young people and vulnerable adults on our programmes and in our care.

## Support for Colleagues

Where a colleague finds a disclosure particularly distressing, they may wish to access the additional services or contact HR Department for support.

Instep UK adopt an open-door policy for any colleagues who wish to discuss their concerns, colleagues will need to be mindful that Instep UK cannot as with learners to give absolute confidentiality to any disclosures.

All learners receive programme inductions and are given a Learner Handbook which includes raising awareness of commitment towards Safeguarding, details of the support services that can be offered and contact details for the Safeguarding team. The understanding of all aspects of Safeguarding and safe working practices is checked at each review and the opportunity to discuss any issues is given.

Assessments are made to ensure that the learners wellbeing is safeguarded by the work placement and their teams to ensure arrangements are in place to, prior to work related activity commencing:

- Pre-placement Health and Safety checks of employer's premises and health and safety management arrangements are complete, including insurance details, young person risk assessments, lone working policies etc.
- Employers are made aware of relevant Instep UK policies
- The requirements for DBS checks are assessed and the relevant processes undertaken where required.

## Roles and responsibilities

### The Board has a duty to:

- Ensure that Instep UK complies with its duties under the above child protection and safeguarding legislation.
- Guarantee that the policies, procedures and training opportunities in Instep UK are effective and comply with the law at all times.
- Guarantee that the Instep UK contributes to inter-agency working in line with the statutory guidance 'Working Together to Safeguard Children' (2018).
- Confirm that the school's safeguarding arrangements take into account the procedures and practices of the LA as part of the inter-agency safeguarding procedures.
- Comply with its obligations under section 14B of the Children Act 2004 to supply the local safeguarding arrangements with information to fulfil its functions.

- Ensure that a member of the board is nominated to liaise with the LA and/or partner agencies on issues of child protection and in the event of allegations of abuse made against another governor.
- Guarantee that there are effective child protection policies and procedures in place together with a staff code of conduct.
- Ensure that there is a senior board level lead responsible for safeguarding arrangements.
- Appoint a member of staff from the SLT to the role of DSL as an explicit part of the role-holder's job description.
- Appoint one or more deputy DSL(s) to provide support to the DSL and ensure that they are trained to the same standard as the DSL and that the role is explicit in their job description(s).
- Make sure that learners are taught about safeguarding, including protection against dangers online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- Adhere to statutory responsibilities by conducting preemployment checks on staff who work with children, young people and/or vulnerable adults taking proportionate decisions on whether to ask for any checks beyond what is required.
- Ensure that staff members are appropriately trained to support learners to be themselves at school, e.g. if they are LGBTQ+.
- Guarantee that volunteers are appropriately supervised.
- Make sure that at least one person on any appointment panel has undertaken safer recruitment training.
- Ensure that all staff members receive safeguarding and child protection training updates, such as e-bulletins, emails and staff meetings, as required, but at least annually.
- Certify that there are procedures in place to handle allegations against members of staff or volunteers.
- Confirm that there are procedures in place to make a referral to the DBS and the Teaching Regulation Agency (TRA), where appropriate, if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.
- Guarantee that there are procedures in place to handle learners' allegations against other learners.
- Ensure that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of learners and staff.
- Ensure that procedures are in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to peer-on-peer abuse.
- Make sure that learners' wishes and feelings are taken into account when determining what action to take and what services to provide to protect individual learners.
- Guarantee that there are systems in place for learners to express their views and give feedback.
- Establish an early help procedure and ensure all staff understand the procedure and their role in it.

- Appoint a designated teacher to promote the educational achievement of LAC and ensure that this person has undergone appropriate training.
- Introduce mechanisms to assist staff in understanding and discharging their roles and responsibilities.
- Make sure that staff members have the skills, knowledge and understanding necessary to keep LAC safe, particularly with regards to the learner's legal status, contact details and care arrangements.
- Put in place appropriate safeguarding responses for learners who go missing from education, particularly on repeat occasions, to help identify any risk of abuse and neglect, including sexual abuse or exploitation, and prevent the risk of their disappearance in future.
- Ensure that all members of the board have been subject to an enhanced DBS check.

## Role of Designated Safeguarding Lead

Instep UK has appointed DSLs and a Head of Safeguarding, Prevent and Wellbeing to have overall responsibility for issues related to safeguarding children and vulnerable adults. The DSL is responsible for acting as a source of advice on child and vulnerable adult safeguarding matters, for coordinating action within the organisation and for liaising with health, children's services, adult services and other agencies about suspected or actual cases of abuse. The Head of Safeguarding, Prevent and Wellbeing will be assisted by other designated colleagues drawn from senior management and suitably experienced colleagues. Designated colleagues have a key responsibility for raising awareness, with colleagues, of issues relating to the welfare of children and vulnerable adults and the promotion of a safe environment for children and vulnerable adults within Instep UK. Designated Leads receive training in Safeguarding children and vulnerable adults and interagency working as required by the LSCB/ LSAB and receive refresher training annually as required by Instep UK. The team are required to keep up-to-date with developments in safeguarding children and vulnerable adults as required.

The Head of Safeguarding, Prevent and Wellbeing has governance over safeguarding matters across Instep UK, the Managing Director has overall responsibility for safeguarding at Board level. The Managing Director will ensure that resources, support and all relevant training are available and in place for colleagues. The Corporate Services Director will support the Safeguarding team in meeting their responsibilities and ensuring that Instep UK meets its commitments and takes it seriously.

There is a clear and robust job description for the DSL role within Instep UK which can be accessed on the system. The Head of Safeguarding, Prevent and Wellbeing is responsible for reviewing the child and vulnerable adult safeguarding policy annually along with any policies linked to the safeguarding policy and processes and procedures that support the embedding and working practices of this policy.

- The DSL / relevant contract manager is responsible for ensuring the child and vulnerable adult policy is available publicly and to parents and carers and that parents and carers are aware that suspected abuse referrals may be made and Instep UK 's role in this.
- The Lead DSL will alert the DBS where a person has been dismissed or left due to risk to or harm that they presented or may have presented to a child or vulnerable adult.
- The DSL will alert the Police – where a crime may have been committed.



- DSLs foster strong links with the LSCB/ LSAB and Designated Local Authority Person.
- Refer all cases of suspected abuse to the local authority children's social care agency or in the case of a vulnerable adult to the local authority adult's social care.
- Liaise with senior management to inform them of issues especially on-going enquiries and police investigations.
- DSLs will maintain a proper record of any safeguarding referral, complaint or concern – even where that concern does not lead to a referral.
- DSLs act as a source of advice, support and expertise to colleagues on matters of safety and safeguarding.
- Liaise with relevant agencies following a referral to ensure it has been dealt with effectively and identify whether a resolution has been achieved DSLs ensures that Instep UK works with employers and other training organisations that provide apprenticeships and or work placements for children or vulnerable adults from Instep UK to ensure that appropriate safeguards are in place.
- The individual responsible for HR and Training with support from the Managing Director ensures that all colleagues, volunteers and delivery partners receive training in safeguarding children and vulnerable adults, are aware of Instep UK 's procedures for safeguarding children and vulnerable adults and that refresher training takes place annually.
- The Head of Safeguarding, Prevent and Wellbeing provides information on a quarterly basis to the MD and SMT setting out how Instep UK has discharged its duties. The Head of Safeguarding, Prevent and Wellbeing is also responsible for reporting deficiencies in procedure or policy identified by the LSCB at the earliest opportunity.
- If the Head of Safeguarding, Prevent and Wellbeing is absent from the business the Deputy DSL will be responsible for undertaking Head of Safeguarding, Prevent and Wellbeing duties.

Under no circumstances should a colleague, volunteer or contractor undertake any investigative activities of alleged or actual abuse, nor should they contact any of the external agencies that will deal with a referral. It is the responsibility of the DSLs with support from the senior management team to decide whether a referral should be made and to which agency or agencies. It is the role of the relevant Safeguarding and Police Services agencies to decide if abuse has taken place.

Delivery partners may make their own referrals but must inform their Instep UK's supply chain manager immediately.

If Instep UK's colleagues are working on external sites, then they would need to be aware of the safeguarding process for that external specific site/company. The DSL would liaise with the corresponding DSL during the process as necessary. For example, if there was a concern about a colleague of the external site then the Instep UK DSL would speak with the DSL of the external site. If there was a safeguarding concern about an Instep UK child, vulnerable adult or colleague then the DSL would deal with this but may, depending on the circumstances, need to inform the DSL on the external site.

If Instep UK is working in schools, then any concerns about pupils or school colleagues must be reported to the designated safeguarding lead in the school. The Instep UK DSL also needs to be informed.

## The DSL has responsibility for:

### Managing referrals

- Refer cases of suspected abuse to Local Authority.
- Support colleagues who make referrals to Local Authority.
- Refer cases to Chanel programme where there is a radicalisation concern.
- Refer cases where a person has been dismissed or left due to risk/harm to a child or vulnerable person to DBS.
- Refer cases where a crime has been committed to the Police.

### Working with others

- As required liaise with “case manager” and the Designated Safeguarding Lead at the Local Authority for child protection concerns on all cases which concern a colleague.
- Liaise with SMT / EXEC board to inform of issues / ongoing enquires related to section 47 of the Children's Act 1989.
- Liaise with colleagues on matters of safety and safeguarding when deciding whether to make a referral by liaising with relevant external agencies.
- Act as a source of support, advice and expertise for colleagues.
- Link with Local Children's and Adults Safeguarding Boards.
- Child /Vulnerable Adult Protection File are transferred to new College, Training Provider or other support services.
- Availability: telephone, skype or in person to deal with any incidents.

### Ongoing Development ad raising awareness

- Understand the assessment process for providing early help and intervention, through locally agreed common and shared assessment process (local safeguarding boards).
- Have working knowledge of each local safeguarding board children's and adults.
- Develop colleague awareness of policies and processes.
- Alert to specific children in need, SEN, Young Carers and “Looked after.”
- Keep detailed, accurate, secure written records of concerns and referrals.
- Ensure open and listening culture.
- Understand Prevent Duty, providing advice and support to colleagues.

- Ensure Policies & Procedures are known.
- Designated Safeguarding Lead role, are shared with all colleagues.

### **Other staff members have a responsibility to:**

- Safeguard learners' wellbeing and maintain public trust in the teaching profession as part of their professional duties.
- Provide a safe environment in which learners can learn.
- Act in accordance with Instep UK procedures with the aim of eliminating unlawful discrimination, harassment and victimisation, including those in relation to peer-on-peer abuse.
- Maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Be aware of the signs of abuse and neglect.
- Be aware of the early help process and understand their role in it.
- Act as the lead professional in undertaking an early help assessment, where necessary.
- Be aware of, and understand, the process for making referrals to MASH (CSCS), as well as for making statutory assessments under the Children Act 1989 and their role in these assessments.
- Make a referral to MASH (CSCS) and/or the police immediately, if at any point there is a risk of immediate serious harm to a child or vulnerable adult.
- Be aware of and understand the procedure to follow in the event that a learner confides they are being abused or neglected.
- Support social workers in making decisions about individual children, in collaboration with the DSL.
- Maintain appropriate levels of confidentiality when dealing with individual cases, and always act in the best interest of the learner.
- Follow Instep UK's procedure for, and approach to, preventing radicalisation as outlined in the Prevent: Extremism and Anti-Radicalisation Policy.

### **Inter-agency working**

- Instep UK contributes to inter-agency working as part of its statutory duty.
- Instep UK will work with MASH (CSCS), the police, health services and other services to protect the welfare of its pupils, through the early help process and by contributing to inter-agency plans to provide additional support.

- Instep UK recognises the importance of information sharing between professionals and local agencies in order to effectively meet learners' needs.
- Staff members are aware that whilst the GDPR and the Data Protection Act 2018 places a duty on Instep UK to process personal information fairly and lawfully, it is not a barrier to sharing information where failure to do so would result in the learner being placed at risk of harm.
- Staff members will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of learners.
- Instep UK also recognises the particular importance of inter-agency working in identifying and preventing child sexual exploitation (CSE).

## Talking to Parents/ Carers

In most cases, it is good practice to be open and honest at the outset with parents/carers about concerns and any action that Instep UK intends to take. Instep UK's Safeguarding and Prevent Policy will be presented to parents/carers online to inform them of our commitments and responsibilities, including the mechanism for communication of this. Where a referral is to be made the Instep UK Lead DSL will make all reasonable efforts to ensure parents/carers are informed. However, an inability to inform parents/carers should not prevent a referral being made. Consideration will be given to not informing them when a child or vulnerable adult expresses a wish that their parent/carer are not informed at this stage.

There are cases where it would not be good practice for the lead DSL to discuss concerns with parents/carers before referral.

In these cases, arrangements for discussing concerns with the parents/carers should be agreed in advance with Social Care and or the Police. Concerns must not usually be discussed with parents/carers before referral where:

- Discussion would put a child or vulnerable adult at risk of significant harm
- Discussion would impede a police investigation or social work enquiry e.g. FGM or forced marriage.
- Sexual abuse is suspected
- Organised or multiple abuse is suspected
- The fabrication of an illness is suspected
- To contact parents/carers would place you or others at risk
- It is not possible to contact parents/carers without causing undue delay in making the referral

In each case the lead DSL must make a reasoned judgement and record the decision s/he reaches. Where further guidance is needed, contact should be made with the Designated Local Authority Person or relevant social care department or Police.

## Confidentiality

A good working relationship between colleagues and learners depends to a large extent on the establishment of trust. However, guarantees of absolute confidentiality should not be given. If a learner / colleague discloses to a colleague, it is important that the boundaries of confidentiality and the need to pass on that information are explained. It is often easier to explain to that you have a responsibility to pass on information on certain matters than to get into a situation where you break a confidence.

## Disciplinary Action

It is a criminal offence for a person over 18 in a position of trust to enter a sexual relationship with any learner under 18 years old, even if the relationship is consensual. If allegations are made against colleague, the same procedures as outlined above must be followed. If a colleague suspects abuse, whether sexual or otherwise, from another colleague, the Safeguarding Lead is informed. Depending on the severity of the allegations outside agencies may be informed and/or the colleague disciplinary procedure may be invoked.

Where a colleague or a volunteer is dismissed from the delivery of services or internally disciplined because of misconduct relating to a learner, we notify the Disclosure and Barring Service (DBS) so that appropriate action is taken.

## Safer Recruitment Processes

When recruiting new members of colleagues Instep UK follows the government guidance “Safeguarding Children: Safer Recruitment in Education and Safer Recruitment principles and has due regard to the Safeguarding Vulnerable Groups Act 2006 and the Protection of Freedoms Act 2012. Instep UK adapts the guidelines within the Baseline Security Standard (BPSS) for all appointments and ensures that Instep UK uses the DBS checking service to assess applicants’ suitability for positions of trust, the Company complies fully with the Code of Practice and undertakes to treat all applicants for positions fairly. Two appropriate references that cover a 3-year period or more are obtained and to ensure qualifications are verified. Safer Recruitment training has been undertaken by senior members of colleagues who conduct recruitment activities in accordance with statutory guidance. Applicants will also have to complete a Declaration Form in line with Instep UK’s recruitment policy (Appendix 2).

Newly appointed colleagues will have a job role induction (JRI) in line with the Instep UK Probation policy over a 3-month period. A robust induction into the child and vulnerable groups safeguarding procedures will also be provided when they join the organisation. Probation is a period of both professional development and review. It provides a fair opportunity for a colleague to understand the organisation, the standard of performance required and to be given the guidance and support to be effective in his or her new role.

Probation allows the manager of the newly-appointed colleague to assess objectively whether the recruit is suitable for the role, considering the individual’s overall capability, skills, performance and general conduct in relation to the job in question.

Instep UK shall ensure that all colleagues are made aware of the standards expected of them and will put in place the appropriate support, training and feedback to achieve these standards.

For the organisation, Probation allows the assessment of the Employee's contribution, potential and suitability for the role to which they have been appointed.

We provide adequate and appropriate colleague resources and training to meet the needs of learners.

All colleagues, volunteers and learners are informed by HR that their job falls under the DBS requirements for an enhanced check under section 128 of the Education Skills Act 2008 those in management roles need to have an additional check to ensure they are not prohibited from teaching. This is in addition to the DBS check.

We will provide the applicant with more information about the level of check required or Teacher. (Criminal record check applicants must be 16 or over)

There are 3 types of check:

- Standard (This checks for spent and unspent convictions, cautions, reprimands and final warnings.)
- Enhanced (This includes the same as the standard check plus any additional information held by local police that's reasonably considered relevant to the workforce being applied for (adult, child or other workforce.)
- Enhanced with list checks (This is like the enhanced check but includes a check of the DBS barred lists.)

Checks will be made using the Teacher Services system (National College of Teaching and Leadership) – a database that can be used prior to appointing a colleague to check for Prohibitions, sanctions and restrictions that might prevent the individual from taking part on certain activities or working in specific positions.

All colleagues will be issued with a copy of Keeping Children Safe in Education 2019 part 1; to be signed and dated upon issue.

## External Speakers

At Instep UK we ensure that any external speakers are appropriately vetted before any public speaking or events are arranged. We ensure that all stakeholders remain free from any extremist or inappropriate material to avoid influence or exposure. Liaison takes place with the BIS Prevent Co-ordinator to pass on any concerns regarding speakers and to access details for vetted, reputable speakers. In the event of any concerns raised regarding external speakers, this will be passed on immediately to the BIS Prevent Co-ordinator to ensure this does not continue in other agencies

## Information Sharing and Record Keeping

There may be some circumstances where the welfare or safety of an individual may take precedence over confidentiality. When sharing information there are Seven Golden Rules that Instep UK will adhere to;

- The Data Protection Act is not a barrier to sharing information.
- Be open and honest.

- Seek advice.
- Share with consent where appropriate. (There may be some circumstances where seeking consent including parental consent is not required)
- Consider safety and well-being.
- Ensure that information sharing is appropriate and secure.
- Keep a record.
- The colleague who receives the allegation or disclosure should make an immediate written record of the conversation, including the following information: -
  - Date and time of report.
  - Name of Individual.
  - DOB of alleged.
  - Nature of allegation.
  - Any other information given, including siblings if relevant. (their full names and DOB if possible)
  - Confirmation that the Learner / colleague has been advised of the next steps.

Disclosure records are held by the Head of Safeguarding, Prevent and Wellbeing, Designated Safeguarding Lead and stored on a secure server. Colleagues take care not to influence the outcome either through the way they speak to or question children/vulnerable adults.

Instep UK continues to welcome the learner whilst investigations are being made in relation to any alleged abuse. The learner may choose to withdraw from learning activities whilst investigations take place.

We follow the procedures as set by the Local Safeguarding Board in relation to the delivery of services' and designated roles and tasks in supporting the learner, family, and employer subsequent to any investigation.

All suspicions and investigations are kept confidential and shared only with those who need to know. Any information is shared under the guidance of the Local Safeguarding Board and Local Authority Designated Officer (LADO).

**Recording** - When recording an incident, a Safeguarding Concern Form (Appendix 1, available on SharePoint) must be completed. Whilst you can record observations, do not interpret or give opinion as this may bias the

information provided and jeopardise any future investigation into the allegation. The Safeguarding Concern Form should be kept securely.

**Report** - Any issues or concerns, allegations or suspicions relating to Safeguarding must be taken seriously and reported to a Safeguarding Designated Lead via the Safeguarding Concern Form (Appendix 1). Remember to follow TED- Tell, Explain, Describe.

**Refer** - Where required, the Safeguarding Representative will refer or support you with guidance on next steps and / or signposting the relevant external agency.

We abide by the DBS regulatory requirements in respect of requesting references and DBS checks for colleagues and volunteers.

New colleagues and volunteers are not given unsupervised access to young people or vulnerable adults pending return of a satisfactory DBS check.

We will meet the DBS reporting requirements in respect of any person who is dismissed from our employment, or resigns in circumstances that would otherwise have led to dismissal for reasons of learner protection concern. This may include sharing appropriate information with another employer's DSL.

Where colleagues or volunteers are working with Job Centre Plus (Department of Work and Pensions funded) clients, additional checks are undertaken to meet our contractual obligations.

## Disclosure

Instep UK strongly supports the principle of working in partnership with children, parents/ carers and adults. This means seeking clear, explicit and informed consent from the individual(s) concerned for information about them to be shared with specified other individuals or agencies where consistent with the individual(s) best interests.

It is possible, however, to identify some circumstances in which sharing confidential information without consent will normally be justified in the public interest. These are:

- When there is evidence that the child is suffering or is at risk of suffering significant harm.
- Where there is reasonable cause to believe that a child may be suffering or at risk of significant harm.
- To prevent significant harm arising to children and young people or serious harm to adults, including through the prevention, detection and prosecution of serious crime.
- For this purpose, serious crime means any crime which causes or is likely to cause significant harm to a child or young person or serious harm to an adult.

## Promotion of Safeguarding through teaching, learning and assessment

We are committed to promoting awareness of learner abuse issues and prevent throughout our training and learning programmes for adults.

We seek out additional development opportunities for all colleagues involved in the delivery of services to ensure that they can recognise the signs and symptoms of possible physical abuse, emotional abuse, sexual abuse and neglect and are aware of the local authority guidelines for making referrals.



We seek out additional development opportunities for all colleagues involved in the delivery of services to ensure that they can recognise the signs of radicalisation and extremism and are aware of the local authority guidelines for making referrals.

We ensure that any relevant history of the learner, particularly in relation to potential indicators of abuse or neglect is recorded confidentially within their records.

This includes learners that are participating in Work experience and off-site activities. We work closely and collaboratively with all contractors and employers to ensure that they have appropriate and effective safeguarding and prevent policies and procedures in place and these are audited on a regular basis by Senior Operations Managers, Quality Managers and the Head of Safeguarding, Prevent and Wellbeing.

## Responding to suspicions

Instep UK is committed to responding promptly and appropriately to all incidents or concerns that may occur and to work with statutory agencies in accordance with the procedures that are set down in 'What to do if you are worried a child is being abused.' (DfE 2014)

We acknowledge that abuse or neglect of basic safety and welfare procedures for learners can take place and that this can take different forms- physical, emotional, and sexual as well as employer's neglect of legal responsibilities and neglect of parental or statutory responsibilities (including where young people are in care of social services).

We also acknowledge that this can take the form of 'virtual' or internet based abuse or neglect.

We recognise that when young people or vulnerable adults are suffering from physical, sexual or emotional abuse, or may be experiencing neglect, this may be demonstrated through the things they say (direct or indirect disclosure) or through changes in their appearance, their behaviour, or their play.

Where any member of colleague who has knowledge of, or a suspicion that, a child, young or vulnerable person is or has been suffering significant harm must refer their concern to the Head of Safeguarding, Prevent and Wellbeing/Designated Safeguarding Lead as soon as possible but within 24 hours at the latest. The member of colleague must make a dated record of the details of the concern on the Safeguarding Concern Form (Appendix 1) and email to the Designated Safeguarding Lead for assessment and signposting, the person raising the concern must not retain any written information.

All allegations or suspicions must be taken seriously. The learner or colleague must be advised that this information cannot be kept confidential and will be passed on to the Head of Safeguarding, Prevent and Wellbeing/ Designated Safeguarding Lead in Instep UK in the first instance.

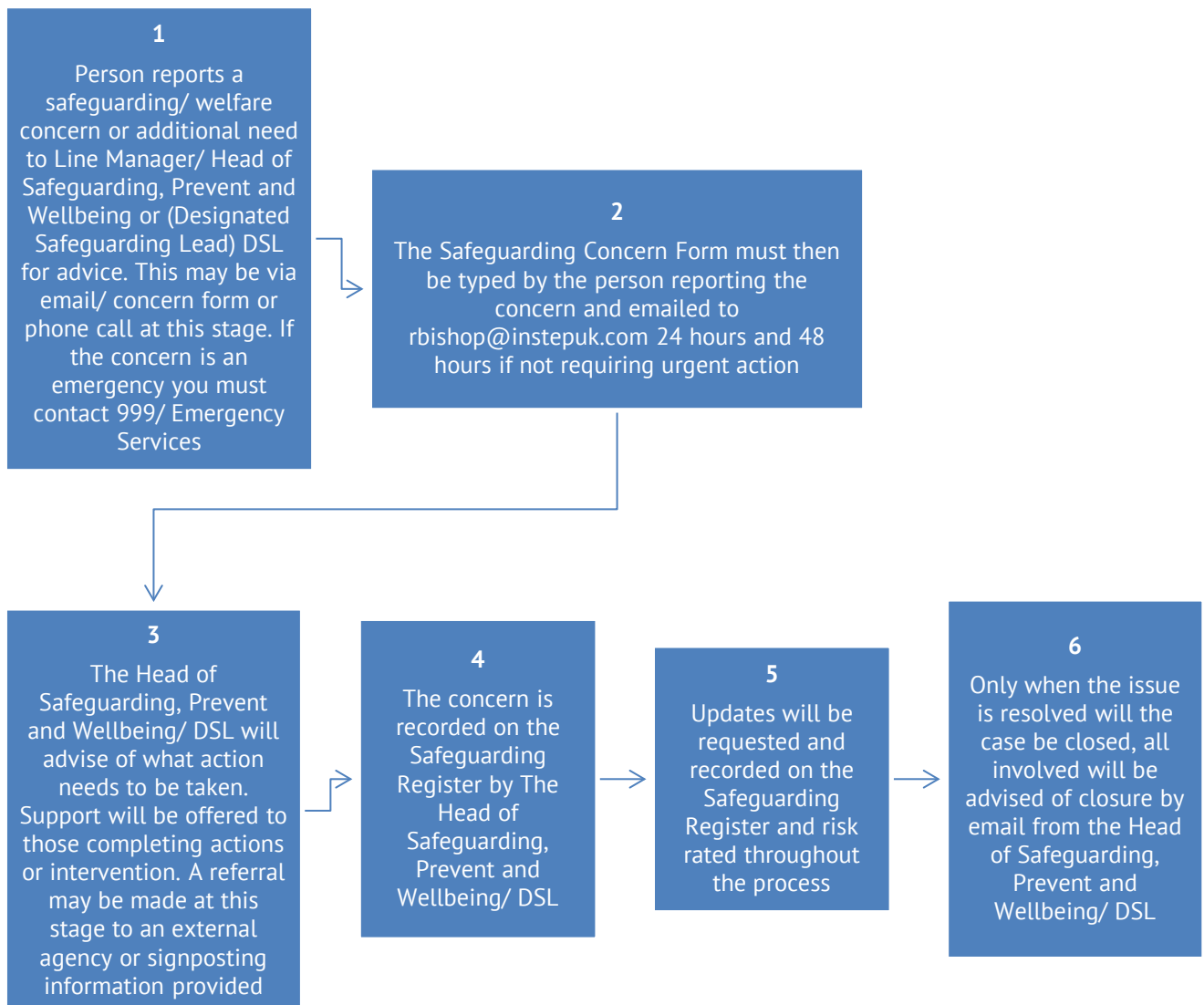
## Early help

Early help means providing support as soon as a problem emerges, at any point. Any learner may benefit from early help, but in particular staff will be alert to the potential need for early help for pupils who:

- Have SEND (whether or not they have a statutory EHC plan).
- Are young carers.

- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups.
- Are frequently missing/going missing from care or from home.
- Misuse drugs or alcohol.
- Are at risk of modern slavery, trafficking or exploitation.
- Are in a family circumstance presenting challenges such as substance abuse, adult mental health problems or domestic abuse.
- Are returned home to their family from care.
- Show early signs of abuse and/or neglect.
- Are at risk of being radicalised or exploited.
- Are privately fostered.

## Safeguarding and Prevent Reporting Process Flowchart (Children, Vulnerable Adults and Prevent Concerns)



## Training Intervention

Individual/Group	Training	Frequency
All new colleagues	Safeguarding induction Prevent Duty and Channel	During Induction period
All colleagues	Safeguarding refresher Prevent Duty/Channel	Annually
Head of Safeguarding, Prevent and Wellbeing/DSL	DSL training/refresher for children and vulnerable groups safeguarding	Every 2 years
Recruitment managers	Safer recruitment	Annually
On-call managers	Safeguarding referral guidance as part of On-Call Training	Annually
Board members	Safeguarding awareness and refresher. Training in relation to safeguarding required in their role as a Board member	Annually
Delivery Partners staff	Safeguarding refresher Prevent Duty Chanel	Annually
Volunteers	Safeguarding refresher Prevent Duty Chanel	Annually

All colleagues are required to abide with the Instep UK Code of Conduct (Appendix D) alongside the Safeguarding Code of Conduct below, which applies to behaviour of all colleagues and volunteers in direct contact with young people and on-line.

This Safeguarding Code of Conduct also details how individuals can also protect themselves against allegations of abuse.

## How to Protect Yourself against Allegations of Abuse:

Avoid personal and social contact with children or vulnerable adults and seek to minimise the risk of any situation arising in which misunderstandings can occur.

### You Should NOT:

- Engage in flirting, innuendo or make suggestive terms or gestures, or indicate favouritism for a child or vulnerable adult.
- Issue or threaten any form of physical punishment.
- Initiate or engage in sexually provocative games, conversations or activity involving or observed by young people, whether based on talking or touching.
- Make sexually suggestive remarks or discriminatory comments to or in front of a young person or discuss colleague's own sexual relationships in front of them.
- Engage in any sort of sexual relationship with a young person even where the young person is aged 16 or over and therefore legally able to consent.
- Use any type of physical punishment to discipline. Shouting at young people should be avoided whenever possible and only if alternative forms of discipline have failed.
- Photograph or film young people for which no prior consent has been sought.
- Broadcast or view any audio and/or visual material (CDs, DVDs, videos, computer or games etc.) that has inappropriate content for young people.
- Invite, or allow, a young person or vulnerable adult who you have met through your work to your home or another location where the purpose is one of friendship or an intimate relationship.
- Engage in, or tolerate, any inappropriate physical activity involving young people.
- Allow the use of inappropriate language to go unchallenged.
- Do things of a personal nature for children or vulnerable adults that they can do for themselves.
- Dismiss an allegation of any sort relating to a customer's welfare or delay the reporting of an allegation.
- Discourage anyone from reporting concerns or ask individuals to keep secrets.
- Make promises to keep secrets, keep any disclosure confidential or overreact or be judgemental should they suspect abuse.
- Spend excessive amounts of time alone with children or vulnerable adults, away from others.
- Make unnecessary physical contact with children or vulnerable adults, however, there may be occasions where physical contact is unavoidable, such as providing comfort at times of distress or physical support in contact sports or similar. In all cases, contact should only take place with consent of the child or vulnerable adult.

- Do not arrange to meet a child or vulnerable adult or their families with whom you work outside of working hours unless it is with consent of the parents/carers and person in charge of the activity.
- Give or receive gifts and/or substances such as drugs, alcohol, cigarettes, e-cigarettes from or to a young person or their family.
- Consume alcohol, take illegal drugs or legal highs, during the working day/evening or at events, including during any breaks or when in the presence of young people.
- Smoke/vape with, or in front of, young people.
- Steal, or condone someone else's stealing, regardless of the value of the stolen item.

### You Should:

- Work in a room where you can be visibly seen, leave the door open and make sure other adults visit the room regularly whilst respecting children and vulnerable adults' rights to privacy and encourage children and adults to feel comfortable enough to report attitudes or behaviours they do not like.
- Plan activities that involve more than one other person being present, or at least within sight and hearing of others. If it is unavoidable always ensure your line manager knows where you are, with whom and why.
- All colleagues, volunteers, delivery partners and contractors at organised activities will be expected to act with discretion regarding their personal relationships. This should ensure their personal relationships do not affect their leadership role within the organisation. All pre-existing relationships between colleagues, volunteers, delivery partners, contractors and or participants of the organised activities must be declared.
- Avoid working in isolation with Children and vulnerable adults, follow the recommended adult-to young people ratios for meetings and activities and ensure there is separate sleeping accommodation for young people, adults and Young Leaders.
- Never give out a personal mobile number or private e-mail address and ensure working hours of contactability are stated.
- Everyone should be aware of the procedures for reporting concerns or incidents and be familiar with the contact details of the DSLs.
- Treat all young people and adults equally and listen to them; avoid favouritism and gossiping.
- Ensure allegations or disclosures by a young person or another adult are taken seriously and reported, including any made against you. Follow the procedures for reporting concerns.
- Never befriend or chat to children or vulnerable adults on social network sites. Always use professional language when writing, phoning, emailing or using the social media to communicate with young people or vulnerable adults.
- Be aware that young people can develop heterosexual and homosexual infatuations (crushes) towards adults working with them. If this is happening, tell your line manager and then respond to the situation in a way that maintains the dignity of all concerned.

- If colleagues, volunteers, delivery partners and contractors have concerns relating to the welfare of a child or vulnerable adult in their care, be it concerns about actions/behaviours of another colleague or concerns based on any conversation with the child or vulnerable adult, particularly where they make an allegation, they should report this immediately.
- Act as a role model.
- Set and monitor appropriate boundaries and relationships when working with children and vulnerable adults based on openness, honesty and respect for the child or vulnerable adult. Ensure that the focus of your relationship with a young person that you have met through any programmes remains professional always. The aim should never be to develop the relationship into a friendship or intimate relationship.
- Respect a young person's/adult's right to personal privacy but never agree to keep any information relating to the harm of a young person/adult confidential. Provide support to a child, young person or vulnerable adult making a complaint.
- Remain calm and ensure that no one is in immediate danger if they suspect abuse. Report any concerns to the DSLs without delay and record all the facts.
- Ensure that if a young person who has become distressed needs comfort that this is done in a way that is both age appropriate and respectful of their personal space. Never act in a way which may be perceived as threatening or intrusive. Always ask a young person before you act. Hugging should be limited and never initiated by colleagues/volunteers. Any hugging should be done by the side of the young person with an arm placed around the shoulders side by side.
- Ensure that if any kind of physical support is required during any activities, it is provided only when necessary in relation to the activity and that this is done in a way that other colleagues can observe you.

Upon induction to the programme the child/ young person or vulnerable adult will be given a copy of the code of conduct and the Instep UK colleagues will go through this document with them to ensure they understand their responsibilities.

If a child, young person or vulnerable adult feels that there has been a breach of the code of conduct they should report this breach by utilising the Instep UK complaints process (Appendix E). The complaint will be fully investigated as per the policy/process and actions taken to ensure the individual making the complaint is fully supported. If the complaint is about another child, young person or vulnerable adult there may be a need for immediate actions to be implemented to ensure the safety of both the individual making the complaint and the person the complaint has been made against. The breach of code of conduct may need the intervention of the Safeguarding Team and the Instep UK safeguarding procedures should be followed.

All complaints are recorded and followed up to a satisfactory conclusion. The SCM for the relevant contract would conduct the investigation with support from the Instep UK complaints manager. Colleagues/volunteers who breach this code of behaviour may be subject to Instep UK disciplinary procedures whilst volunteers who do so may not be able to continue in their volunteering role. Serious breaches may result in a referral being made to a statutory authority.

All children, young people and vulnerable adults should be treated with respect and the code of conduct has been written with respect, dignity and safety for every individual in mind, however colleagues

understand that children/young people can abuse their peers. Peer abuse can take many forms such as sexting, bullying, physical and emotional abuse, and inappropriate banter.

## **Instep UK's Safeguarding Policy Links to the following:**

- Whistle Blowing Policy
- Anti-Bullying Policy
- Code of Conduct
- Grievance Procedure
- Disciplinary Procedure
- Appeals Procedure
- Confidentiality Procedure
- Health & Safety
- Internet, email and data security
- Learner computer and internet usage policy
- Social Media policy
- Dignity at Work Policy
- Recruitment Policy
- Business Continuity Policy
- Evacuation Procedure
- Archiving Policy
- Children Missing from Education.
- DBS policy statement



## Appendix

- Appendix A:** Instep UK National Designated Safeguarding Concern Form
- Appendix B:** Instep UK Human Resources Declaration Form
- Appendix C:** Instep UK Duty Manager Rota
- Appendix D:** Instep UK Code of Conduct
- Appendix E:** Instep UK Complaints procedure and form
- Appendix F:** List of relevant Agencies and Contact Details
- Appendix G:** Information Security Management
- Appendix H:** DBS policy statement

## **Confidential Information**

### **Safeguarding Concern Form**

To be completed by the colleagues/ employer/ learner who has concerns or to whom a disclosure has been made. This form must be typed and submitted to the Head of Safeguarding.

**No further action must be taken following a disclosure or concern without informing the Head of Safeguarding. This form must be submitted on the same day when requiring immediate action and in due time before the close of day at 5pm to allow for any assessment/ action to be taken.**

**IN ADDITION, PLEASE AVOID SCANNING ANY INFORMATION WHEREVER POSSIBLE.**

Name of recorder/ person reporting concern:			
Relationship to learner/ Job Title:			
Date of record:		Time of record:	
Name of learner/ colleagues member:			
Learner's/ Colleague's date of birth:		Place of Learning/ Work:	
Learner's/ Colleague's address:			
Learner's/ Colleague's contact number:		Learner's/ Colleague's Next of Kin details:	
Course:			
Consent:	Have you discussed with the learner/ colleague, the information contained in this document will be shared with Designated Safeguarding Lead/ Safeguarding Champion?	<input type="checkbox"/>	<input type="checkbox"/>
Confidentiality / Sharing of Information	<p>The exception to this is where to do so, would put the child, young person or adult at risk of suffering significant or serious harm or it would undermine the prevent, detection, or prosecution of a serious crime including where seeking consent may lead to interference with any potential assessment/ investigation. In these cases, external agencies may be contacted and informed.</p> <p>Information may also be shared with other internal colleagues where it is deemed in the best interest of the learner.</p>		

Details of the concern and source of concern (of an incident: time, place and all relevant persons involved).

**Outline using direct quotes from source of information where possible. Distinguish between fact and opinion. Please continue on reverse if necessary.**

<b>Date of incident:</b>		<b>Time of incident am/pm:</b>	
<b>Date of initial report:</b>		<b>Time of initial report am/pm:</b>	

This information is to be stored in the Safeguarding Register AND is only accessible by the Head of Safeguarding, all paper based versions should be destroyed or deleted. If the allegation/concern involves a colleague all documentation should be sent following the same process.

## Appendix B: Human Declaration Form

Instep UK is steadfast in its commitment to safeguarding and promotes thorough and safe recruitment practices in line with the Company's duty of care in ensuring the safety and wellbeing of its stakeholders.

Surname	
Full Forenames	
Full Permanent Address	
Date of Birth	

## Safeguarding

United Kingdom legislation and guidance relating to the welfare of children and vulnerable adults has as its core, the principle that the welfare of children and young people must be the paramount consideration. Instep UK fully support this principle and therefore, we require that everyone connected with Instep UK who will encounter children/vulnerable adults or their personal details, complete and sign this declaration. This record is to ensure that children's/vulnerable adults' welfare is safeguarded.

- Has any children's services department, the NSPCC or the police ever conducted an enquiry or investigation about any allegations or concerns that you may pose to an actual or potential risk to young people/children?

Yes		No	
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- Have you ever been convicted of any offence relating to children, young people or vulnerable adults?

Yes		No	
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- Have you ever been the subject of disciplinary procedures or been asked to leave employment or voluntary activity due to inappropriate behaviour towards a child/vulnerable adult?

Yes		No	
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## Access to Government Assets

Furthermore, Instep UK has Government contracts, some or all of which require it to access Government Assets (defined as premises, systems, information or data). The Company has a duty to protect these assets and this obligation extends to its colleagues and agents. Since you are, or may become, such a person, all sections on this form will need to be completed.

**Note:** If a conditional offer of employment is made to you, you may be required to obtain and produce for inspection, a Disclosure certificate, which is an independent check against the National Collection of Criminal Records to confirm the accuracy of the information provided on this form.

- Have you ever been convicted of or found guilty by a Court of any offence in any country (excluding parking but including all motoring offences even where a spot fine has been administered by the Police) or have you ever
- been put on probation (probation orders are now called community rehabilitation orders) or absolutely/conditionally discharged or bound over after being charged with any offence or is there any action pending against you?

You need not declare convictions which are “spent” under the Rehabilitation of Offenders Act (1974). *(If yes, please provide further details in the section provided)*

Yes		No	
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- Have you ever been convicted by a Court Martial or sentenced to detention or dismissal whilst serving in The Armed Forces of the UK or any Commonwealth or foreign country? You need not declare convictions which are “spent” under the Rehabilitation of Offenders Act (1974). *(If yes, please provide further details in the section provided)*

Yes		No	
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- Do you know of any other matters in your background which might cause your reliability or suitability to have access to Government assets to be called into question?

Yes		No	
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If you answered 'YES' to any of the questions on this form, please give details below.

This declaration must be signed and returned to Human Resources prior to commencing any work.

I declare that the information I have provided on this form is true and complete to the best of my knowledge and belief. I also consent to my personal data being processed and kept for the purposes described above in accordance with the Data Protection Act 2018. In addition, I understand that any false information or deliberate omission in the information I have given on this form may disqualify me for employment in connection with Government contracts. I undertake to notify any material changes in the information I have given above, including any future criminal convictions, to the HR department.

I understand that a Disclosure check will be undertaken as a condition of my employment, details of which will be held by Instep UK. I declare that I am aware of my statutory rights under the Data Protection Act 2018 and hereby give my consent for Instep UK to release my name, Disclosure reference number and date of issue to third parties for bid and/or contractual purposes only.

Name	<input type="text"/>
Job Role	<input type="text"/>
Signature	<input type="text"/>
Date	<input type="text"/>

**Note:** You are advised that under the provision of the Rehabilitation of Offenders Act (NI Order) (1974) (Exceptions) Order 1975 as amended by the rehabilitation of Offenders Act 1974 (Exceptions) (Amendments) Order 1986 you should declare all convictions, including spent convictions. (*applicable where working with children and/or vulnerable groups*)

## Appendix C: Duty Managers Rota

Duty Managers Name	Contact Number	Hours Covered	Notable Dates

Notable dates may be Christmas or if a DSL has annual leave or personal appointments.

Hours covered will be due to the Head of Safeguarding, Prevent and Wellbeing being off ill or on holiday and will be confirmed during weekly team meetings as necessary.

## Appendix D: Code of Conduct

See How to Protect Yourself Pg 46-49

## Appendix E: Instep UK Complaints procedure and form

See Complaints, Compliments and comments procedure

## Appendix F: List of relevant agencies and contact details

The links below have been taken from the Working Together to Safeguard Children 2018 guidance document.

### For children and young people

<b>Childline</b>	Tel: 0800 1111
<b>Child Exploitation and Online Protection Centre (CEOP)</b>	<a href="http://www.thinkuknow.co.uk/">http://www.thinkuknow.co.uk/</a> TEL: 0870 000 3344
<b>Child and Family Consultation Service</b>	<a href="http://www.there4u.info/index.html">http://www.there4u.info/index.html</a>

<b>NSPCC Helpline</b>	Tel: 0808 800 5000 <a href="https://www.nspcc.org.uk/">https://www.nspcc.org.uk/</a>
<b>NSPCC Whistleblowing helpline</b>	Tel: 0800 028 0285 <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>
<b>Internet Watch Foundation</b>	<a href="https://www.iwf.org.uk/">https://www.iwf.org.uk/</a>
<b>Social Care link for Safeguarding concerns</b>	<a href="https://www.gov.uk/report-child-abuse-to-local-council">https://www.gov.uk/report-child-abuse-to-local-council</a>

The need to refer allegations or concerns about possible risk posed by colleagues, volunteers, delivery partners or contractors to the Designated Local Authority Person (formerly LADO) is a requirement as detailed in the government guidance *Working Together to Safeguard Children (2018)*

Website: [www.samaritans.org](http://www.samaritans.org)  
 Telephone: 020 8394 8300  
 Email: [jo@samaritans.org](mailto:jo@samaritans.org)  
 UK Helpline: 08457 90 90 90

Local GP Finder: [www.nhs.uk/ServiceDirectories/pages/serviceSearch.aspx](http://www.nhs.uk/ServiceDirectories/pages/serviceSearch.aspx)

Website: [www.bacp.co.uk](http://www.bacp.co.uk)  
 Email: [bacp@bacp.co.uk](mailto:bacp@bacp.co.uk)

Website: [www.aest.org.uk](http://www.aest.org.uk)



Website: [www.nspcc.org.uk](http://www.nspcc.org.uk)  
Telephone: 0808 800 5000  
TEXTPHONE: 0800 056 0566  
Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

Website: [www.kidscape.org.uk](http://www.kidscape.org.uk) Helpline: 08451 205 204

Website: [www.ChildLine.org.uk](http://www.ChildLine.org.uk) ChildLine: 0800 1111

Website: [www.voiceuk.org.uk](http://www.voiceuk.org.uk) Telephone: 0845 122 8695

Website: [www.bullying.co.uk/](http://www.bullying.co.uk/) Email: [help@bullying.co.uk](mailto:help@bullying.co.uk)

Website: [www.direct.gov.uk/en/EducationAnd Learning/AdultLearning/index.htm](http://www.direct.gov.uk/en/EducationAnd Learning/AdultLearning/index.htm)

Website: [www.mind.org.uk](http://www.mind.org.uk)  
Telephone: 020 8519 2122 or 0845 766 0163  
Email: [contact@mind.org.uk](mailto:contact@mind.org.uk)

Website: [www.elderabuse.org.uk](http://www.elderabuse.org.uk)

Website: [www.cruse.org.uk](http://www.cruse.org.uk)  
Telephone: 0844 477 9400 (helpline)  
Email: [info@cruse.org.uk](mailto:info@cruse.org.uk) or [helpline@cruse.org.uk](mailto:helpline@cruse.org.uk)

Young Person's Free Helpline: 0808 808 1677

Website: [www.suzytoplugh.org](http://www.suzytoplugh.org) Telephone: 020 7091 0014  
Email: [info@suzytoplugh.org](mailto:info@suzytoplugh.org)

Website: [www.ncdv.org.uk/](http://www.ncdv.org.uk/) Telephone: 0800 970 2070  
Email: [office@ncdv.org.uk](mailto:office@ncdv.org.uk)

Website: [www.respond.org.uk/easy\\_read.html](http://www.respond.org.uk/easy_read.html)  
Helpline: 0808 808 0700

Website: [www.relate.org.uk](http://www.relate.org.uk) Telephone: 0845 456 1310 or 01788 573241  
Email: [enquiries@relate.org.uk](mailto:enquiries@relate.org.uk)

Website: [www.thesite.org](http://www.thesite.org)

Website: [www.talktofrank.com](http://www.talktofrank.com)  
Tel: 0800 77 66 00  
(in 120 languages)  
TEXTPHONE: 0800 917 8765

Website: [www.stonewall.org.uk](http://www.stonewall.org.uk)

Website: [www.thinkuknow.co.uk](http://www.thinkuknow.co.uk)  
Telephone: +44 (0)870 000 3344  
Email [enquiries@ceop.gov.uk](mailto:enquiries@ceop.gov.uk)

Website: [www.carers.org](http://www.carers.org)  
Email: [info@carers.org](mailto:info@carers.org)

Website: [www.youngminds.org.uk/](http://www.youngminds.org.uk/)  
Telephone: 0808 802 5544 or 0207 089 5050  
Email: [ymentquiries@youngminds.org.uk](mailto:ymentquiries@youngminds.org.uk)

Website: [www.dyslexiaaction.org.uk/](http://www.dyslexiaaction.org.uk/)  
Telephone: 0300 303 8840  
Email: [supportus@dyslexiaaction.org.uk](mailto:supportus@dyslexiaaction.org.uk)

Website: [www.asmentoring.co.uk/](http://www.asmentoring.co.uk/)  
Email: [enquiries@asmentoring.co.uk](mailto:enquiries@asmentoring.co.uk)

Website: [www.gov.uk/access-to-work/overview](http://www.gov.uk/access-to-work/overview)  
Telephone: 0345 268 8489

Email: [atwosu.london@dwp.gsi.gov.uk](mailto:atwosu.london@dwp.gsi.gov.uk)

Website: [www.autism.org.uk/](http://www.autism.org.uk/)  
Telephone: 0207 833 2299 or 0808 800 4104  
Email: [nas@nas.org.uk](mailto:nas@nas.org.uk)

Website: [www.patoss-dyslexia.org/](http://www.patoss-dyslexia.org/)  
Telephone: 01386 712 650

Website: [/www.renardassociates.co.uk](http://www.renardassociates.co.uk)  
Telephone: 07825686851

Website: [www.nationaldomesticviolencehelpline.org.uk/](http://www.nationaldomesticviolencehelpline.org.uk/)  
Telephone: 0808 200 0247

Website: [//rapecrisis.org.uk/](http://rapecrisis.org.uk/)  
Email: [rcewinfo@rapecrisis.org.uk](mailto:rcewinfo@rapecrisis.org.uk)

Website: [//staysafeonline.org/](http://staysafeonline.org/)

Website: [www.crisis.org.uk/](http://www.crisis.org.uk/)  
Telephone: 0300 636 1967  
Email: [enquiries@crisis.org.uk](mailto:enquiries@crisis.org.uk)

Website: [//england.shelter.org.uk/](http://england.shelter.org.uk/)  
Telephone: 0808 800 4444  
Email: [info@shelter.org.uk](mailto:info@shelter.org.uk)

Website: [www.citizensadvice.org.uk/](http://www.citizensadvice.org.uk/)

Website: [www.stepchange.org/](http://www.stepchange.org/)  
Telephone: 08001381000

Website: [www.moneyadviceservice.org.uk](http://www.moneyadviceservice.org.uk)  
Telephone: 0300 500 5000

Website: [//ceop.police.uk/safety-centre/](http://ceop.police.uk/safety-centre/)  
Telephone: 0870 000 3344

Website: [www.bpas.org/](http://www.bpas.org/)  
Telephone: 03457 304030  
Email: [clientservices@bpas.org](mailto:clientservices@bpas.org)

Website: [www.themix.org.uk/](http://www.themix.org.uk/)  
Telephone: 0808 8084994

Website: [www.dressforsuccessgl.org](http://www.dressforsuccessgl.org)  
Telephone: 0203 773 7279  
Email: [info@dressforsuccessgl.org](mailto:info@dressforsuccessgl.org)

Website: [www.smartworks.org.uk/](http://www.smartworks.org.uk/)  
Telephone: 0208 962 6586 or 0207 288 1770  
Email: [london@smartworks.org.uk](mailto:london@smartworks.org.uk)

Website: [www.suitedbootedcentre.org.uk/](http://www.suitedbootedcentre.org.uk/)  
Telephone: 07808 531654  
Email: [info@suitedbootedcentre.org.uk](mailto:info@suitedbootedcentre.org.uk)

Website: [www.drinkaware.co.uk/](http://www.drinkaware.co.uk/)  
Telephone: 0207 766 9900  
Email: [contact@drinkaware.co.uk](mailto:contact@drinkaware.co.uk)

Website: [www.actiononaddiction.org.uk](http://www.actiononaddiction.org.uk)  
Telephone: 0300 330 0659

## Appendix G: Information Security

In accordance with Instep UK's Data and Information Security Policy documents are reviewed on an annual basis, Risk is managed continually through a controlled Risk management process and full annual analysis. The Risk Register records all risks which are reported to SMT and Directors.

All information security incidents will be reported to Instep UK's IT Support Organisation immediately who will be responsible for ensuring the incident is correctly raised and evaluated for risk, The IT Support Organisation will work with the identified asset owner responsible to resolve such incidents and take any further actions required for future mitigation. Where deemed appropriate, part of the process would be to inform the Managing Director for the resolution of any such incidents.

All delivery partners and Instep UK's direct delivery sites are subject to Instep UK's scheduled audits against relevant security controls in Instep UK's Data and Information Security Policy. Any non-conformities are recorded in the corrective action log to be dealt with according to our Data and Information Security Policy. Where a security incident is identified, this is followed up in accordance with Instep UK's Data and Information Security process.

Instep UK ensures encryption is in place, computers are locked down, so no one can use USB data sticks. We have a clear desk policy, and this is checked during audits at delivery partner's premises and all policies are checked annually with our delivery partner's.

All assets relating to Instep UK's information systems are controlled and maintained in accordance with the Data and Information Security Policy.

All customer data has been classified as Corporate Sensitive and is protected under the Corporate Sensitive protection method as set out in the Data and Information Security Policy. Aggregation of data must be considered and is covered under the classification that has been attributed.

All physical storage media is marked with physical asset tags and recorded in the IT asset management system. All protectively marked classifications will be dealt with as set out in the Data and Information Security Policy under Corporate Sensitive data.

All delivery partners are subject to Instep UK's scheduled audits against relevant security controls. Any non-conformities are recorded in the corrective action log to be dealt with according to our corrective action procedures. Where a security incident is identified, this is followed up in accordance with Instep UK's Data and Information Security Policy.

Under Instep UK's Data and Information Security Policy it states all learner related data is to be treated as Corporate Sensitive. Instep UK's agreed delivery partner's sign agreements stating they will work in complete compliance to Instep UK's Document set – Disclaimer detail is also included in all communication via email.

All colleagues are issued with a Job Description for the job role they are employed for. The Roles and Responsibilities are defined within the Job Description. Job Descriptions clearly state individual responsibility for IT security, Safeguarding and other operational areas.

All Instep UK colleagues sign a confidentiality agreement under Instep UK's standard terms of employment. Data security/protection awareness is maintained by regular communications, inductions and visits by internal auditors. Instep UK's carry out scheduled internal audits in accordance with our Data and Information Security Policy.

System records are maintained so that the Company Network and systems can be adequately monitored and audited for signs of actual, or possible, security breaches and attacks. 24 x 7 monitoring is in place through Instep UK's Hosted Contract and in accordance with the Data and Information Security Policy and IT Service Delivery Document.

Delivery partners are required to undertake the security training before they are given access to the systems. Where we collect such items as learner CVs and / or training certificates these are all handled in the same way as any paper record in that they are stored electronically on encrypted storage drives or where a paper copy is maintained it would be stored with the customer file and stored in secure locked cabinets, all learner data is classified within our Data and Information Security systems as corporate sensitive.

Instep UK has classified all data as Corporate Sensitive for a full compliant backup and restore service to be applied in line with its contractual agreements.

Instep UK maintains a corporate classification system to ensure that all Corporate Sensitive data is held on archive for the life time of the contract in addition to the agreed retention period for audit purposes, this is fully documented within our Data and Information Security Policy.

All hard copy data once archived is securely stored. We shred all paperwork not required to be kept for audit purposes on site.

Access to the Internet is via a fully managed firewall with access to web sites being restricted by Internet filtering software. No laptop or other device can access customer data away from a secure site unless the contract is delivered on secure premises.

Access to sensitive data will be provided only through the uses of a company PC or Laptop (asset) which must be a domain member unit which will be regulated through End Point analysis. All devices will be encrypted. 2 factor authentications will be configured to ensure the colleagues would connect using a username and password. Role level Active Directory security will then ensure the system direct the member to the dedicated systems file.

## **Appendix H: DBS Policy Statement**

See DBS Policy Statement