



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, Diversity and Inclusion, 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 wellbeing and safety of its stakeholders including learners and colleagues. Instep UK recognises its responsibility and acknowledges that it is the duty of the workforce in its entirety to uphold fundamental British values (fBV) 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.

Statement of Intent

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

Name	Role	Location	Contact Details
Gina De Simone	(Designated Safeguarding Lead) Head of Quality and Safeguarding	National	gdesimone@instepuk.com Safeguarding Contact: 07720 664460

Name	Role	Location	Contact Details
Leanne Gagic	(Deputy Safeguarding Lead) Director of Corporate Services Nominated Board Member	National	lgagic@instepuk.com

The role of the nominated board member is to meet regularly with the DSL to monitor that appropriate policies and procedures are in place.

Instep UK's Safeguarding Email contact: safeguarding@instepuk.com

It is Instep UK's intention to:

Instep UK is committed to safeguarding and promoting the welfare, both physical and emotional, of every learner and colleague. We implement a whole-organisational preventative approach to managing safeguarding concerns, ensuring that the wellbeing of learners and colleagues 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 learners or colleagues.
- Ensure that relevant employment and security checks are undertaken, as required and that staff 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 or colleague 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 all staff, including members of the board, understand their responsibilities relating to safeguarding legislation and statutory guidance, are alert to the signs of abuse and know how 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.
- 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 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 a DSL 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 GDPR 2018.
- Ensure that personal information is confidential and should only be shared with the permission of the individual concerned unless the disclosure of confidential information is necessary to support a learner or colleague 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 learner or colleague and on a strict “need to know” basis.

Definitions

Learners are defined as anyone who has committed to undertake a funded programme of learning with Instep UK, including but not limited to an apprenticeship or a short course.

Colleagues are defined as anyone who has a paid contractual agreement, either full or part-time, permanent, fixed term or contractual with Instep UK, including Board members, or those who volunteer to provide services for Instep UK.

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:

- Learner missing from education.
- Those at risk of Female Genital Mutilation (FGM)
- 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 learners and colleagues is defined as:

- Protecting learners and colleagues from maltreatment.
- Preventing the impairment of learners' or colleagues' health or development.
- Taking action to enable all learners and colleagues to have the best outcomes.

Introduction

Instep UK believes that it is always unacceptable for a child, vulnerable adult, learner or colleague to experience abuse or discrimination of any kind and recognises its responsibility to safeguard the welfare of all learners and colleagues by a commitment to practice which protects them. Instep UK have a commitment that no learner or colleague 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, Diversity and Inclusion 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 learners and colleagues.

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 learners and colleagues by:

- Valuing, listening to and respecting them.
- Adopting policies, guidelines and a Code of Conduct for colleagues.

- Sharing information about concerns with agencies which need to know and involving learners and colleagues appropriately.
- Ensuring that the DBS (Enhanced), in accordance with their guidelines, checks all colleagues. This information is regularly checked and monitored via the Single Central Register which contains all colleague details.
- Recruiting colleagues safely, ensuring all necessary checks are made in line with Safer Recruitment Policies and Procedures.
- Making all new colleagues aware of our safeguarding policy and procedures.
- Providing all colleagues with safeguarding training which is updated regularly.
- Ensuring that all learners are aware of our Safeguarding policy and procedures.
- Ensuring all colleagues 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 with immediate effect or there has been a significant change within the organisation. The DSL is responsible for updating the policy with support from the 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:

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

Legal Framework

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

- Children Act 1989
- Sexual Offences Act 2003
- Children Act 2004
- The Mental Capacity Act 2005

- Safeguarding Vulnerable Groups Act 2006
- Equality Act 2010
- The Education (School Teachers' Appraisal) (England) Regulations 2012
- Protection of Freedoms Act 2012
- The Care Act 2014
- General Data Protection Regulation 2018
- Data Protection Act 2018

Plus, this statutory guidance:

- HM Government (2013) Multi-agency practice guidelines: Handling cases of Forced Marriage
- DfE (2015) The Prevent Duty
- DfE (2018) Working Together to Safeguard Children
- DfE (2018) Disqualification under the Childcare Act 2006
- DfE (2020) Keeping children safe in education

Our commitment

- We believe that a learner or colleague should never experience abuse of any kind, including bullying.
- We promote the welfare of all learners and colleagues to keep them safe.
- We are committed to practice in a way that protects them and have a whistleblowing policy to support this.
- We will protect learners and colleagues from radicalisation and extremism, by responding swiftly.
- We will provide colleagues 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 fundamental British values, including freedom of speech, rights to be safe and listened to, by creating an environment that encourages learners and colleagues to raise any concerns.
- Encourage learners to develop a sense of autonomy and independence in their learning and development.
- Enable learners and colleagues to have the self- confidence and the vocabulary to halt 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.

Missing from Education

Learners 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. Attendance should be monitored closely, and poor or irregular attendance should be addressed. Please see **Missing from Education Policy** for more information.

Definitions and Indicators of Abuse

Colleagues should be familiar with indicators for all forms of abuse:

Physical Abuse: this may involve	Signs or Indicators: this may include
<ul style="list-style-type: none"> ○ Hitting or punching ○ Shaking ○ Throwing ○ Poisoning ○ Burning or Scalding ○ Drowning ○ Suffocating 	<ul style="list-style-type: none"> ○ Unexplained bruises, marks or injuries on any part of the body. ○ Frequent visits to the GP or A&E. ○ An injury inconsistent with the explanation offered. ○ Fear of family members being approached for an explanation. ○ Aggressive behaviour or severe temper outbursts ○ Flinching when approached. ○ Reluctance to get changed or wearing long sleeves in hot weather. ○ Depression. ○ Withdrawal behaviour, other behaviour or mood change.

Sexual Abuse: this may involve	Signs or Indicators: this may include
<ul style="list-style-type: none"> <input type="radio"/> Forcing or enticing a person to take part in sexual activities. <input type="radio"/> Physical contact including assault by penetration (for example rape or oral sex) <input type="radio"/> Non-penetrative acts such as masturbation <input type="radio"/> Kissing <input type="radio"/> Rubbing, touching or pressing against clothing <input type="radio"/> Forcing or enticing them to look at, or in the production of, pornographic material or watching sexual activities. <input type="radio"/> Grooming a person in preparation for abuse (including via the internet) <input type="radio"/> Upskirting - 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 <input type="radio"/> Forcing or enticing a person to send them nude images 	<ul style="list-style-type: none"> <input type="radio"/> Sexually transmitted diseases <input type="radio"/> Stomach pains <input type="radio"/> Discomfort when walking or sitting down <input type="radio"/> Sudden or unexplained changes in behaviour e.g. becoming aggressive or withdrawn <input type="radio"/> Fear of being left with a specific person or group of people. <input type="radio"/> Sexual knowledge which is beyond their age or developmental age <input type="radio"/> Sexual drawings or language <input type="radio"/> Saying they have secrets they cannot tell anyone about <input type="radio"/> Self-harm or mutilation, sometimes leading to suicide attempts. <input type="radio"/> Eating problems such as overeating or anorexia

Emotional Abuse: this may involve	Signs or Indicators: this may include
<ul style="list-style-type: none"> <input type="radio"/> Telling the person that they are worthless, inadequate and unloved. <input type="radio"/> Not giving the person opportunities to express their views, or deliberately silencing them. <input type="radio"/> Making fun of what they say or how they communicate. <input type="radio"/> Interactions that are beyond the developmental capability <input type="radio"/> Preventing them participating in normal social interaction <input type="radio"/> Seeing or hearing the ill-treatment of another person <input type="radio"/> Serious bullying (including cyber bullying) <input type="radio"/> Causing the person frequently to feel frightened or in danger. <input type="radio"/> Exploitation or corruption of person. 	<ul style="list-style-type: none"> <input type="radio"/> Behavioural change. <input type="radio"/> Being unable to socialise with others. <input type="radio"/> Fear of making mistakes. <input type="radio"/> Self-harm. <input type="radio"/> Fear of family member being approached regarding their behaviour. <input type="radio"/> Use of inappropriate language, possession of violent, extremist literature. <input type="radio"/> Changes in language used, the expression of extremist views, advocating violent actions and means.

Abuse by Neglect: this may involve	Signs or Indicators: this may include
<ul style="list-style-type: none"> <input type="radio"/> Neglect may occur during pregnancy because of material substance abuse. <input type="radio"/> A family member failing to provide adequate food, clothing and shelter. <input type="radio"/> Exclusion from home or abandonment. <input type="radio"/> Failure to protect a person from physical harm or danger failure. <input type="radio"/> Failure to ensure access to appropriate medical care or treatment. <input type="radio"/> Neglect of, or unresponsiveness to a person's basic emotional needs. 	<ul style="list-style-type: none"> <input type="radio"/> Dirty or smelly <input type="radio"/> Loss of weight, or being constantly underweight. <input type="radio"/> Inappropriate dress for the weather. <input type="radio"/> Complaining of being tired all the time. <input type="radio"/> Having few friends <input type="radio"/> Worsening health conditions <input type="radio"/> Skin infections <input type="radio"/> Anxiety, depression or fear

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

Recognition of Abuse, including Neglect or Bullying.

Recognising abuse is not easy, and it is not the responsibility of colleagues 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.

- All colleagues will be aware of the indicators of abuse, such as those in relation to bullying, domestic violence, sexual assaults and online harassment.
- All colleagues will be aware of the necessary procedures to follow to prevent abuse, as outlined in Instep UK's **Anti-Bullying Policy**.

- All colleagues will be aware of the behaviours linked to abuse and will understand how these put learners and colleagues in danger.
- Colleagues will be aware of the effects of a person 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.

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 learners) 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 Abuse - 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. All colleagues undertake training on FGM.

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. All colleagues undertake training on Forced Marriages.

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. All colleagues undertake training on Modern Slavery.

Risks/ abuse related to family/cultural belief/ faith - Some families have certain values and beliefs that can cause harm to a learner or colleague. 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. In extreme cases learners or colleagues who are perceived as “disobedient” or “different” are believed to be

possessed by a spirit controlling their behaviour. They 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 learner or colleague's wellbeing. Some issues can include Substance Misuse, Mental Health and Domestic Abuse. Some learners or colleagues may also provide care for their parents or other family members and as such, be unable to contribute to extra-curricular activities. Some learners or colleagues may also have been responsible for home-schooling children during lockdowns of the pandemic. This can cause extreme stress and anxiety and make normal routines extremely difficult, including homeworking.

Homelessness - The DSL and deputy(s) will be aware of the contact details and referral routes into the Local Housing Authority so that concerns over homelessness can be raised as early as possible.

County Lines criminal activity - Refers to drug networks or gangs grooming and exploiting people to carry drugs and money from urban areas to suburban areas, rural areas and market and seaside towns.

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 Multi-Agency Safeguarding Hub (MASH or similarly defined).

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.

Colleagues 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 learners with SEND, the above factors will always be taken into consideration.
- When managing a safeguarding issue relating to a learner with SEND, the DSL may liaise with the learner's family where appropriate, to ensure that the learner's needs are effectively met.

Positive Safeguarding

Instep UK will ensure that learners are taught about safeguarding, including online safety, as part of a broad and balanced curriculum. We will use Instep Insights as one of many tools and ensure the content will be contextualised to cover topics such as:

- Healthy relationships and respectful behaviour
- Gender roles, stereotyping and equality, including fBV.
- Body confidence and self-esteem.
- Prejudiced behaviour, including radicalism and extremism.
- That sexual violence and sexual harassment is always wrong.
- Identifying the risks online
- 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.

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 progress review and the opportunity to discuss any issues is given.

Where learners are required to carry out a work placement as part of their course, assessments are made to ensure arrangements are in place 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.

The Prevent Duty

In 2010, the Government published the Prevent Strategy. This raised an awareness of the specific need to for training providers to safeguard their learners from violent extremism. Please refer to Instep UK's ***Prevent Duty Statement***.

Extremist groups have attempted to radicalise learners 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.

Allegations Against Colleagues

Instep UK recognises that whilst most colleagues who work with learners 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 who has behaved in way that has harmed, or may have harmed, a learner or colleague.
- We ensure that all learners, employers and colleagues 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 colleague may have abused a learner or other colleague.
- Each manager knows that the DSL is to be made aware immediately of any allegation or complaint against a colleague.
- We respond to any disclosure by learners, employers or colleagues 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.

Abuse of a position of trust

Instep UK recognises that our colleagues are in a position of trust with our learners in our care 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 teach and 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 protect the rights and needs of all learners on our programmes and in our care.

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 a colleague, the same procedures as outlined above must be followed. If a colleague suspects abuse, whether sexual or otherwise, from another colleague, the DSL 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.

Support for Colleagues

Where a colleague finds a disclosure particularly distressing, they may wish to access the additional services, contact HR Department or speak to an Instep UK Mental Health First Aider for support.

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

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 Instep UK’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 safeguarding and in the event of allegations of abuse made against another board member.
- Guarantee that there are effective safeguarding 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 DSLs 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.
- 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 pre-employment checks on staff who work with learners taking proportionate decisions on whether to ask for any checks beyond what is required.
- Ensure that colleagues are appropriately trained to support learners to be themselves in the learning environment, 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 colleagues receive safeguarding training and updates, such as bulletins, emails and meetings, as required, but at least annually.
- Certify that there are procedures in place to handle allegations against colleagues.
- 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 colleagues.
- 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 them.
- Guarantee that there are systems in place for learners to express their views and give feedback.
- Establish an **early help procedure** (see page 25) and ensure all staff understand the procedure and their role in it.

- 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 a DBS check.

Role of Designated Safeguarding Lead (DSL)

Instep UK has appointed a DSL to have overall responsibility for issues related to safeguarding learners. The DSL is responsible for acting as a source of advice on safeguarding matters, for coordinating action within the organisation and for liaising with health, children services, adult services and other agencies about suspected or actual cases of abuse. The DSL will be assisted by other colleagues who will be appointed as Designated Safeguarding Officers (DSOs). DSOs have a key responsibility for raising awareness with colleagues, of issues relating to the welfare of learners and the promotion of a safe environment within Instep UK. The DSL will receive training in Safeguarding 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 as required.

The DSL has governance over safeguarding matters across Instep UK, the Managing Director has overall responsibility for safeguarding at Board level. The CEO 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 are clear and robust job descriptions for the DSL and DSO roles within Instep UK which can be accessed on the system. The DSL is responsible for reviewing the Safeguarding Policy annually along with any policies linked to safeguarding processes and procedures that support the embedding and working practices of this policy.

- The DSL is responsible for ensuring the safeguarding policy is available publicly and to manage any suspected abuse referrals.
- The 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 learner or colleague.
- The DSL will alert the Police where a crime may have been committed.
- Refer all cases of suspected abuse to the local authority.
- Liaise with senior management to inform them of issues especially on-going enquiries and police investigations.
- The DSL will maintain a proper record of any safeguarding referral, complaint or concern – even where that concern does not lead to a referral.
- The DSL will 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.
- The individual responsible for HR and Training with support from the CEO ensures that all colleagues receive training in safeguarding, are aware of Instep UK 's procedures for safeguarding and that refresher training takes place annually.
- The DSL provides information on a quarterly basis to the CEO and SMT setting out how Instep UK has discharged its duties. The DSL is also responsible for reporting deficiencies in procedure or policy identified by the LSCB at the earliest opportunity.
- If the DSL is absent from the business the Deputy DSL will be responsible for undertaking these duties.

Under no circumstances should a colleague 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 DSL 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.

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 DSL 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.
- Link with local Safeguarding and Prevent Boards.

Ongoing Development and 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 learners in need, SEND, 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.

Other colleagues have a responsibility to:

- Safeguard learners' and colleagues' wellbeing and maintain public trust in Instep UK 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.
- Be aware of and understand the procedure to follow in the event that a learner or colleague confides they are being abused or neglected.
- Support social workers in making decisions about learners or colleagues, 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 or colleague.
- Follow Instep UK's procedure for, and approach to, preventing radicalisation as outlined in the ***Prevent Duty Statement***.

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 learners and colleagues, 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.
- Colleagues 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 a learner or colleague being placed at risk of harm.
- Colleagues will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of learners or colleagues.
- Instep UK also recognises the particular importance of inter-agency working in identifying and preventing child sexual exploitation (CSE).
- Instep UK supports [Working Together to Safeguard Children 2018](#) guidance

Talking to Parents/ Carers if required.

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 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 learner expresses a wish that their parent/carer are not informed at this stage or where it would not be good practice for the DSL to discuss concerns with parents/carers before referral.

Safer Recruitment Processes

When recruiting new members of colleagues Instep UK follows government guidance and adopts Safer Recruitment practices. To summarise, Instep UK uses the DBS checking service to assess applicants' suitability for positions of trust, ensures two appropriate references are obtained and ensures qualifications are verified. Safer Recruitment training is undertaken by senior colleagues who conduct recruitment activities in accordance with statutory guidance. Please read the **Safer Recruitment Policy** for more details.

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 local Prevent Coordinator 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 local Prevent Coordinator to ensure this does not continue.

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 or 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 them that you have a responsibility to pass on information on certain matters than to get into a situation where you break a confidence.

Disclosure

Instep UK strongly supports the principle of working in partnership with learners. 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, or reasonable cause to believe, that the learner or colleague is suffering or is at risk of suffering significant harm.
- To prevent significant harm arising to learners and colleagues, including through the prevention, detection and prosecution of serious crime.

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 Instep UK will ensure:

- 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 wellbeing.
- 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 using the correct reporting methods.

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 emailed to the correct inbox and is kept securely.

Report - Any issues or concerns, allegations or suspicions relating to Safeguarding must be taken seriously and reported to the DSL via the Safeguarding Concern Form (Appendix 1).

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

Promotion of Safeguarding through Teaching, Learning and Assessment

We are committed to promoting awareness of learner abuse issues and the Prevent Agenda throughout our training and learning programmes.

We seek out additional development opportunities for all colleagues 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 reporting procedures.

We seek out additional development opportunities for all colleagues to ensure that they can recognise the signs of radicalisation and extremism and are aware of the reporting procedures.

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.

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 aforementioned legislation, guidance and regulations.

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 online abuse or neglect.

We recognise that when learners or colleagues are suffering from physical, sexual or emotional abuse, or may be experiencing neglect, this may be demonstrated through the things they say, through changes in their appearance or their behaviour.

Where any colleague who has knowledge of, or a suspicion that, a learner or colleague is or has been suffering significant harm, they must refer their concern to the DSL as soon as possible but within 24 hours at the latest. The colleague must make a dated record of the details of the concern on the Safeguarding Concern Form (Appendix 1) and email the safeguarding inbox 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 DSL 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 or colleague may benefit from early help, but in particular where they:

- 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.

All colleagues are required to abide with the Instep UK Code of Conduct alongside the Safeguarding recommendations for conduct below. These recommendations also detail how individuals can protect themselves against allegations of abuse.

How to Protect Yourself against Allegations of Abuse:

Avoid personal and social contact with learners and colleagues 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 learner.
- Issue or threaten any form of physical punishment or shout at a learner.
- Initiate or engage in sexually provocative games, conversations or activity involving or observed by learners.
- Make sexually suggestive remarks or discriminatory comments to or in front of learners or discuss your own sexual relationships in front of them.
- Engage in any sort of sexual relationship with a learner even where the young person is aged 16 or over and therefore legally able to consent.
- Photograph or film learners for which no prior consent has been sought.
- Broadcast or view any audio and/or visual material that has inappropriate content for learners.
- Invite, or allow, a learner 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 learners.
- Allow the use of inappropriate language to go unchallenged.
- Do things of a personal nature for learners that they can do for themselves.
- Dismiss an allegation of any sort relating to a learner's or colleague'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 learners, away from others.
- Make unnecessary physical contact with learners or colleagues, 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 individual.
- Do not arrange to meet a learner or their families with whom you work outside of working hours unless it is with consent of a SLT member or the DSL.
- Give or receive gifts and/or substances such as drugs, alcohol, cigarettes, e-cigarettes from or to a learner.
- Consume alcohol, take illegal drugs or legal highs, during working hours, including during any breaks or when in the presence of learners.
- Smoke/vape with, or in front of, learners.
- 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 meeting with learners on an individual basis.
- 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 at organised activities will be expected to act with discretion regarding their personal relationships. They should ensure their personal relationships do not affect their role within the organisation. All pre-existing relationships between colleagues and/or participants of the organised activities must be declared.
- Never give out a personal mobile number or private email address and ensure working hours of contactability are stated.
- Be aware of the procedures for reporting concerns or incidents and be familiar with the contact details of the DSL and DSOs.
- Treat all learners equally and listen to them; avoid favouritism and gossiping.
- Ensure allegations or disclosures by a learner or colleague are taken seriously and reported, including any made against you. Follow the procedures for reporting concerns.

- Never befriend or chat to learners on private social network sites. Always use professional language when writing, phoning, emailing or using social media to communicate with learners.
- Be aware that learners can develop infatuations (crushes) towards colleagues 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.
- Act as a role model.
- Set and monitor appropriate boundaries and relationships when working with learners based on openness, honesty and respect for them. Ensure that the focus of your relationship with a learner that you have met through any programme remains professional.
- Respect a learner's right to personal privacy but never agree to keep any information relating to the harm of a learner confidential. Provide support to a learner making a complaint.
- Remain calm and ensure that no one is in immediate danger if they suspect abuse. Report any concerns without delay and record all the facts.
- 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 with consent.

If a learner feels that there has been a breach of the code of conduct they should report this breach by utilising the Instep UK complaints process, for more detail consult the **Compliments, Complaints and Comments Policy**. Colleagues should also consult the **Whistleblowing Policy**. 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 learner 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 learners and colleagues 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 learners 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:

- Alcohol and Drugs Policy
- Anti-Bullying Policy
- Appeals Procedure
- Children Missing from Education
- Compliments, Complaints and Comments Policy

- Code of Conduct
- Disciplinary Procedure
- Data and Information Security Policy
- Equality, Diversity and Inclusion Policy
- Freedom of Expression Policy
- Grievance Procedure
- Health & Safety Policy
- Information, Advice and Guidance Policy
- Missing In Education Policy
- Photography and Filming Policy
- Prevent Duty Strategy and Action Plan
- Recruitment and Selection Policy and Process
- Safer Recruitment Policy
- Social Media policy
- Whistle Blowing Policy

Appendix A – Safeguarding Concern Form

Confidential Information **Safeguarding Concern Form**

To be completed by the colleague/ employer/ learner who has concerns or to whom a disclosure has been made. This form must be submitted to safeguarding@instepuk.com.

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 of the disclosure. If the concern is urgent, please also call the DSL on 07720 664460.

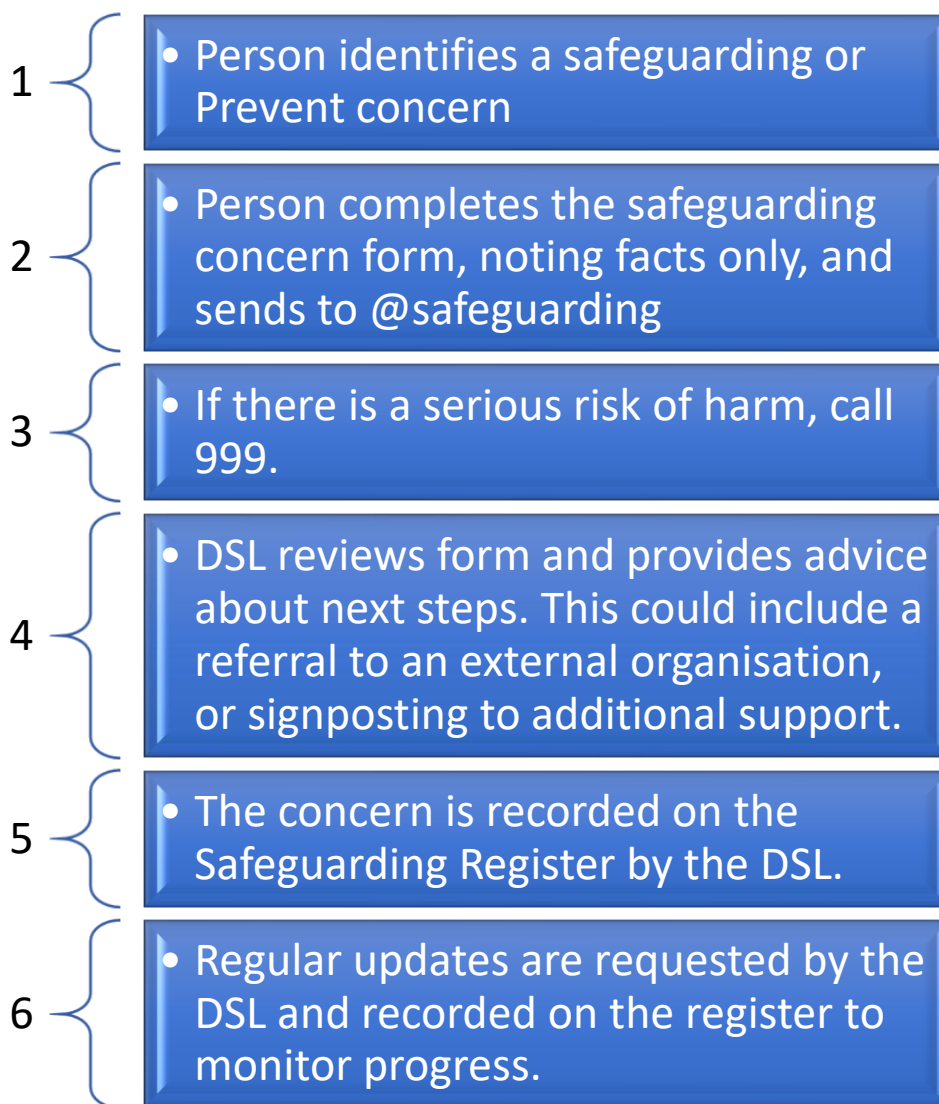
Name of recorder/ person reporting concern:			
Relationship to learner/ colleague & Job Title:			
Date of record:		Time of record:	
Name of learner/ colleague member:			
Consent:	Have you discussed with the learner/ colleague the information contained in this document will be shared with Head of Safeguarding?	<input type="checkbox"/>	<input type="checkbox"/>
Confidentiality / Sharing of Information	Information may also be shared with other internal colleagues where it is deemed in the best interest of the learner.		

Details of the concern and source of concern (incident: time, place and all relevant persons involved). Use direct quotes from source where possible. Keep to the facts and do not include your opinion.

Date of incident:		Time of incident am/pm:	
Date of initial report:		Time of initial report am/pm:	

This information is to be stored in the Safeguarding Register AND is only accessible by the Head of Safeguarding. If the allegation/concern involves a colleague all documentation should be sent following the same process. Once completed, please email to safeguarding@instepuk.com .

Appendix B – Safeguarding Flowchart



Appendix C - Mandatory Training Topics

As part of Instep UK's commitment to keeping all learners and staff safe please can you complete our Mandatory Training. Please hover over *the heading* of each course to access to access the training.

Once completed, please inform your line manager and place your certificates on your BreatheHR account, in the Training section.

Refreshed Prevent for FE Sector (May 2021)

You will need to:

- ✦ Create an account.
- ✦ select the appropriate level for their role e.g., **practitioner** (if you deal directly with learners daily), **leader and manager** (if you are a people manager, Director or 'Head Of' role), **support staff** (if you provide support to those who deal directly with learners) or **Board Member**. If you are not sure which category you fall in to, then please contact the DSL.
- ✦ Then complete the **Module**, complete the **Assessment**, then download and save the **Certificate**.

Completely Revised Safeguarding for FE Sector (May 2021)

- ✦ Access the link above and select **Book**, create an account and you will be sent an email with the link to access the programme.
- ✦ When you access your programme, read each page and select the button **Mark As Complete** to release the next page via the ➤ symbol.
- ✦ The programme has 4 modules that are called **Weeks** and last approx. 1 hour with a test at the end. Instep UK request that you complete these as soon as possible and **by the end of week 2 of your induction** at the very latest and do not spread these over 4 weeks.
- ✦ Once you have completed all 4 modules, you will be able to download your **Certificate**.

ACAS – Equality and Diversity

You will need to:

- ✦ Create an account.
- ✦ Answer a short survey to receive their certificate.

GDPR

You will need to:

- ✦ Create an account.
- ✦ Download and save the certificate.

Modern Slavery Training

You will need to:

- ✦ Create an account and log in.
- ✦ Following the training you will be required to answer knowledge questions.
- ✦ You will need to screen print the final screen, showing the completed training (the blocks will change colour to show completed).
- ✦ Please save the screen-print as you proof of completion.

Female Genital Mutilation (FGM)

You will need to:

- ✦ Create an account and log in.
- ✦ Following the training you will be required to answer knowledge questions.
- ✦ You will receive a certificate upon completion.

Forced Marriage

You will need to:

- ✦ Create an account and log in.
- ✦ Following the training you will be required to answer knowledge questions.
- ✦ You will receive a certificate upon completion.

Safer Recruitment (for Hiring Managers only)

You will need to:

- ✦ Create an account
- ✦ Only managers that recruit should complete the safer recruitment training **annually**.

Appendix D - Mandatory Training Schedule by role

Individual/Group	Training	Frequency
All new colleagues	Safeguarding Induction meeting with DSL Mandatory Training List	During Induction period
All colleagues	Safeguarding Refresher Prevent Duty Refresher	Bi-Annually (unless significant legislative changes)
Designated Safeguarding Lead	DSL training/refresher for children and vulnerable groups safeguarding	Bi-Annually (unless significant legislative changes)
Hiring managers	Safeguarding Refresher - Safer recruitment	Annually
Board members	Safeguarding awareness and refresher. Training in relation to safeguarding required in their role as a Board member.	Bi-Annually (unless significant legislative changes)