# Safeguarding and Prevent Policy

## 1. Introduction and Statement of Commitment

Instep UK is fully committed to safeguarding and promoting the welfare of all learners, colleagues, and wider stakeholders by creating a safe, inclusive, and respectful environment. Instep UK will take all reasonable steps to protect all stakeholders from harm and accepts its corporate responsibility for their wellbeing and safety. We adopt a proactive and preventative approach to protect individuals from harm, radicalisation, discrimination, and abuse. Colleagues 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.

## 2. Purpose

Designed to ensure the safety and wellbeing of individuals, in particular young people and vulnerable adults, accessing Instep's services. Primary purposes include:

1. **Protection:** To prevent neglect, abuse, exploitation, or harm from occurring to those at risk.
2. **Awareness:** To promote understanding amongst staff and stakeholders about safeguarding issues and appropriate responses.
3. **Responsibility:** To establish clear roles, responsibilities, and procedures for reporting concerns or incidents.
4. **Prevention:** To create a safe environment through policies, training, and best practices.
5. **Compliance:** To adhere to legal and regulatory requirements related to safeguarding.
6. **Response:** To outline procedures for responding effectively and appropriately to concerns or disclosures.

This Safeguarding Policy aims to foster a culture of vigilance, accountability, and support to protect vulnerable individuals and promote their wellbeing.

## 3. Safeguarding Culture

Instep UK is committed to fostering a strong safeguarding culture where the safety, wellbeing and voice of the learner are central to all activity. Safeguarding is everyone's responsibility and all colleagues are expected to maintain professional curiosity, remain vigilant to changes in behaviour or engagement and act promptly where concerns arise. Staff are encouraged to report concerns without hesitation and will always be supported when doing so in good faith. Safeguarding practice at Instep UK is proactive rather than reactive, with early intervention, open dialogue and collaboration with employers and external agencies used to reduce risk and promote learner wellbeing.

**Spot, Speak, Support**
As part of Instep UK's culture, a safeguarding approach based on the principle of Spot, Speak, Support is promoted. Staff are expected to spot potential safeguarding concerns by remaining alert to changes in behaviour or wellbeing, speak by reporting concerns promptly through Instep's safeguarding procedures and

support learners by ensuring appropriate action is taken through the safeguarding team and external agencies where required.

## 4. Scope and Definitions

This policy applies to all staff, learners, delivery partners, contractors, and volunteers across Instep UK. It covers the safeguarding of children, young people, and adults at risk.

**Safeguarding** - Safeguarding is the process of protecting the health, well-being, and human rights of individuals, especially children, young people, and vulnerable adults, to ensure they are safe from harm, abuse, neglect, and exploitation. It involves proactive measures to prevent harm and promote a safe environment where individuals can thrive and feel secure.

**Children** - Children are defined in the Children Act 1989 and 2004, as a person under the age of 18. Apprentices between the ages of 16-18 are therefore categorised as children.

**Vulnerable Adult** - A vulnerable adult is an individual aged 18 or over who may be at risk of harm, neglect, or exploitation due to age, disability, mental health issues, or other circumstances that limit their ability to protect themselves or make informed decisions. In safeguarding, the term emphasises the need to identify and support adults who are more susceptible to abuse or exploitation to ensure their safety, well-being, and independence.

**Radicalisation** - Is the process by which an individual adopts extremist beliefs, attitudes, or behaviors that support violence or terrorism, often leading to the justification or engagement in such activities. It involves the influence of ideas, groups, or individuals that promote radical views, which can pose risks to individuals and society by encouraging support for violent extremism.

**Extremism** - Refers to beliefs, ideologies, or actions that are far outside the accepted societal norms and values, often advocating for radical change through unacceptable means, including violence. It involves holding or promoting views that may threaten social cohesion, security, or the rights of others, and can encompass various forms of political, religious, or ideological extremism.

**Prevent Duty** - Is a legal obligation placed on specified authorities and organisations to identify, prevent, and address the risks of radicalisation and extremism. It requires individuals and institutions to promote community cohesion, challenge extremist ideas, and take appropriate steps to safeguard individuals who may be vulnerable to radical influences, in order to protect society from terrorism and violent extremism.

## 5. Legal and Regulatory Context

The legal and regulatory framework provides a comprehensive set of laws, acts and guidance that we must adhere to in order to ensure safeguarding, equality, data protection and the welfare of children and vulnerable adults. We must operate within this legal context to ensure compliance, promote safe practices, protect vulnerable groups and foster an inclusive, safe environment for all learners and staff.

**Key Legislation includes:**

**Children Act 1989 and 2004:** Establishes the duty to safeguard and promote the welfare of children, including inter-agency working and safeguarding responsibilities

**Sexual Offences Act 2003:** Defines sexual offences, and provides protection from sexual abuse and exploitation

**Mental Capacity Act 2005:** Provides a framework for acting and making decisions on behalf of adults who lack the capacity to do so themselves, ensuring their rights and welfare are protected.

**Safeguarding Vulnerable Groups Act 2006:** Establishes the vetting and barring scheme to prevent unsuitable individuals from working with children and vulnerable adults.

**Equality Act 2020:** Protects individuals from discrimination, promoting equality, diversity and inclusion.

**The Education (School Teachers' Appraisal) Regulations 2012:** Supports effective staff management and professional standards within educational settings.

**Protection of Freedoms Act 2012:** Regulates the Disclosure and Barring Service (DBS), vetting and barring arrangements, and aspects of data handling and privacy.

**The Care Act 2014:** Sets out local authority responsibilities to promote wellbeing and safeguard adults at risk.

**Counter Terrorism and Security Act (2015):** Places a statutory duty on specified authorities, including education and training providers, to have due regard to the need to prevent people from being drawn into terrorism (Prevent Duty).

**Terrorism Act (2000) and (2006):** Provides the legal framework defining terrorism related offences.

**Domestic Abuse Act (2021):** Strengthens protection and support for victims of domestic abuse and recognises domestic abuse as a safeguarding issue.

**Modern Slavery Act (2015):** Provides the legal framework for addressing human trafficking, forced labour and exploitation.

**Data Protection Act 2018 and GDPR:** Regulates how personal data is stored, processed and shared, ensuring lawful, proportionate and secure information handling.

**Serious Crime Act (2015):** Introduced the offence of coercive or controlling behaviour in intimate or family relationships.

**Statutory Guidance:**

**HM Government (2013) Multi-agency Practice Guidelines:** Guides professionals on identifying and responding to forced marriage and related safeguarding concerns.

**DfE (2015) The Prevent Duty:** Outlines responsibilities for specified authorities, included education and training providers, in preventing radicalisation.

**DfE (2018) Working Together to Safeguard Children:** Provides statutory guidance on safeguarding and child protection arrangements and multi-agency working.

**DfE (2018) Disqualification under the Childcare Act:** Sets out disqualification criteria for individuals working in relevant childcare settings.

**DfE (2022) Keeping Children Safe in Education:** Details safeguarding policies and procedures that all educational settings must follow.

## 6. Roles and Responsibilities

| Name | Role | Contact Details |
|------|------|-----------------|
| Al Bird | Nominated Board Member | abird@instepuk.com |
| Hayley Wilcox | SLT Lead and Deputy Designated Safeguarding Lead | hwilcox@instepuk.com |
| Tracey Carter | Designated Safeguarding Lead | tcarter@instepuk.com |
| Joanne Senior | Designated Safeguarding Officer | jsenior@instepuk.com |
| Susie Beavan | Designated Safeguarding Officer | sbeavan@instepuk.com |
| Nick Bremner | Designated Safeguarding Officer | nbremner@instepuk.com |
| Sally Denyce-Gautier | Designated Safeguarding Officer | sgautier@instepuk.com |
| Lauren Green | Designated Safeguarding Officer | lgreen@instepuk.com |

All members of the Safeguarding Team should be contacted via the safeguarding inbox safeguarding@instepuk.com not their direct work email addresses, to ensure all information is held centrally and kept confidential.

The Designated Safeguarding Lead is also contactable via the safeguarding telephone number on **07849 643815**.

**Responsibilities of the Nominated Board Member and SLT Lead**

- Ensure Instep UK complies with all legislative duties relating to safeguarding and Prevent
- Ensure all policies, procedures and staff CPD opportunities are effective and comply with the law
- Ensure Instep's safeguarding arrangements detail local authority intervention where it is necessary
- Ensure there is more than one staff suitably trained to perform the DSL role
- Ensure the education provided to learners includes safeguarding, in a broad and balanced curriculum
- Ensure suitable vetting procedures for new and existing staff members and that hiring managers have received Safer Recruitment Training
- Ensure there are systems in places for stakeholders to express their views and provide feedback

**Responsibilities of the Designated Safeguarding Lead**

- Ensure the Safeguarding and Prevent Policy is kept up to date and is available publicly
- Manage any suspected abuse referrals
- Alert the DBS where a staff member has been dismissed or left the business due to the risk or harm that they presented or may have presented to a learner or colleague
- Alert the Police where a crime may have been committed
- Refer all cases of suspected abuse to the local authority
- Refer cases to the Chanel programme where there is a radicalisation concern
- Inform and liaise with senior management to keep them up to date on issues, especially ongoing queries and police investigations
- Manage all safeguarding referral, complaint, or concern records
- 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

- Ensures all staff have undertaken and remain up to date with their safeguarding and Prevent CPD

**Responsibilities of the Designated Safeguarding Officers**

- Acting as the point of contact for all safeguarding concerns
- Supporting with staff training and offering support and guidance as needed
- Recording safeguarding concerns and referrals
- Ensuring safeguarding procedures are followed and reviewed regularly
- Promoting a safeguarding culture within the organisation
- Implement safeguarding practices under the DSL's direction

**Responsibilities of other colleagues**

- Safeguard learners' and colleagues' wellbeing and maintain public trust in Instep UK
- Provide a safe environment in which learners can learn and thrive
- Challenge any inappropriate behaviours or strong ideologies that may cause offence to others
- Adhere to the Safeguarding and Prevent Policy and supporting processes around referrals
- Keep up to date with CPD to ensure knowledge and awareness is robust around safeguarding matters
- Maintain appropriate levels of confidentiality when dealing with individual cases, and always act in the best interests of the learner or colleague.
- Report all safeguarding and radicalisation concerns to the safeguarding team promptly
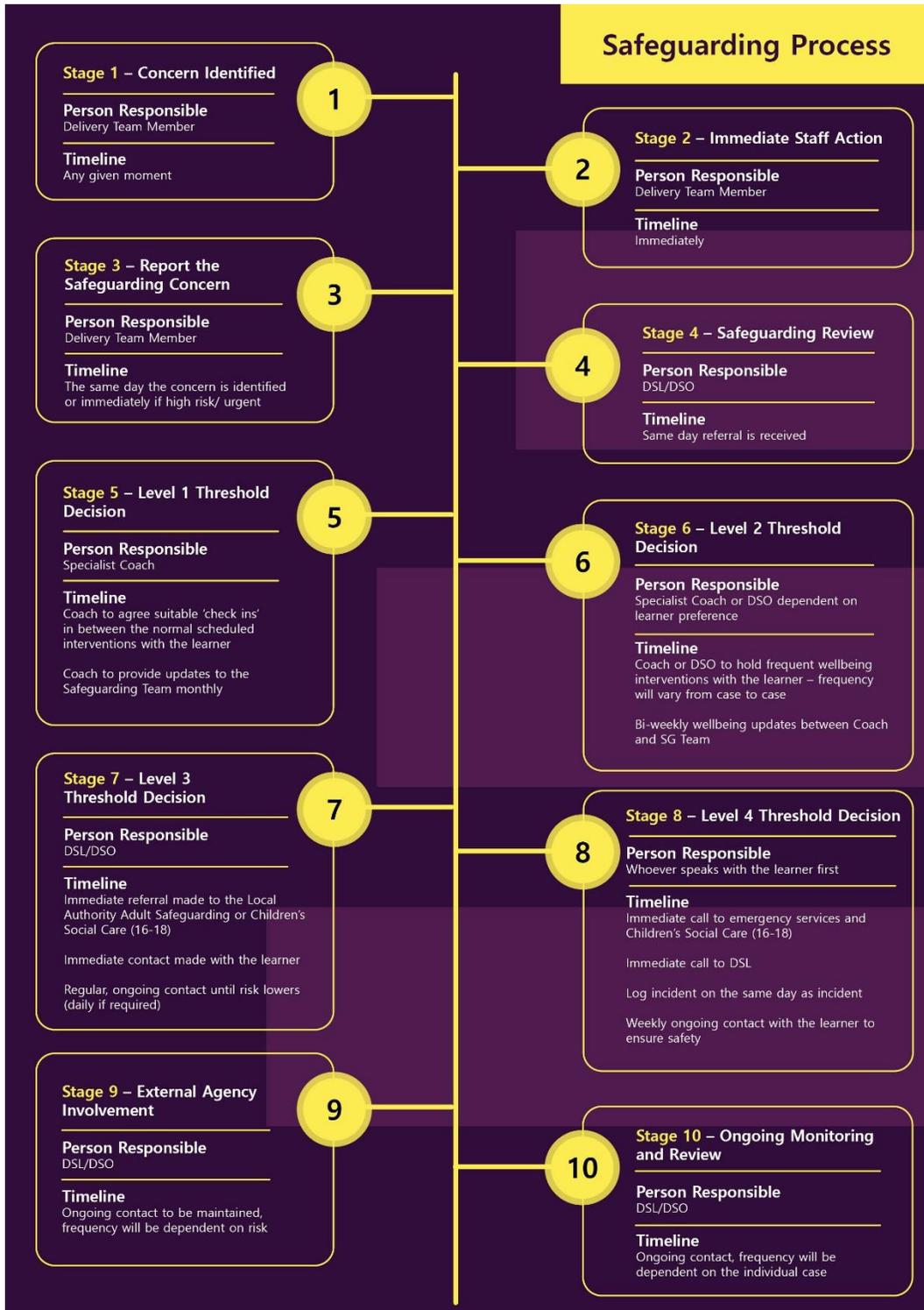
## 7. Recognising Safeguarding Concerns

**Signs or indicators could include (particularly when supporting people remotely):**

| Physical Abuse | Emotional Abuse |
|---|---|
| ▪ Look for bruises, burns, cuts, swelling or unexplained scars in any visible body parts during video calls<br>▪ Multiple injuries at different healing stages or injuries that don't match the explanation provided<br>▪ Wearing clothing that is inappropriate for the weather<br>▪ Learner appears nervous, tense or avoids certain questions<br>▪ Mood change, reluctant to engage, or signs of distress<br>▪ Reacting fearfully when discussing or being asked about personal safety or experiences<br>▪ They may mention feeling unwell, tired or in pain<br>▪ Statements indicating they are afraid of someone or are being controlled | ▪ Learner becomes less responsive, avoids contact or isolates themselves from others<br>▪ Mood shift – from cheerful to withdrawn, anxious or tearful<br>▪ Expressing feelings of worthlessness, shame or self-blame<br>▪ Signs of nervousness when discussing certain topics or individuals<br>▪ Excessive apologising or self-criticism<br>▪ Expressions of low self worth and feelings of helplessness<br>▪ Statements indicating control or manipulation<br>▪ Fear or anxiety about someone<br>▪ Signs of anxiety, depression or agitation<br>▪ Less participation in activities or conversations |
| **Sexual Abuse** | **Abuse by Neglect** |
| ▪ Expressions of confusion or distress about certain topics<br>▪ Disclosure or hints about inappropriate behaviour or experiences<br>▪ Sudden withdrawal or reluctance to engage in conversations | ▪ Sudden drop in contact, or messages that are brief, inconsistent, or show distress<br>▪ The individual becomes less responsive or avoids scheduled contacts<br>▪ They may mention feeling unwell, unsafe, or uncared for<br>▪ Learners may describe a lack of basic needs, such as hunger, exhaustion, or poor hygiene |

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|---|---|
| ▪ Use of sexual language or references that are inappropriate<br>▪ Anxiety or agitation during calls or messages<br>▪ Sudden changes in mood, such as becoming fearful, anxious or depressed.<br>▪ Signs of embarrassment, shame, or reluctance to discuss personal issues<br>▪ Unexplained injuries or bruises in visible areas | ▪ Signs of emotional distress, anxiety or depression<br>▪ Lack of social contact<br>▪ Changes in sleep or eating patterns, or neglect of personal care<br>▪ Loss of weight or being constantly underweight |
| **Financial Abuse** | **Radicalisation** |
| ▪ Expressions of worry or anxiety about money or financial security<br>▪ Statements indicating they feel pressured or coerced about financial decisions<br>▪ Disclosures that someone else is controlling or managing their money<br>▪ Avoidance of financial topics or changes in tone when discussing money<br>▪ Lack of basic requirements; food, clothes or shelter<br>▪ Inability to pay bills<br>▪ Unexplained withdrawals from accounts<br>▪ Inconsistency between standard of living and income<br>▪ Reluctance to take up assistance which is needed | ▪ Use of language that promotes violence, intolerance, or hatred toward particular groups<br>▪ Increased anger, frustration, or hostility towards particular groups<br>▪ Becoming increasingly secretive, avoiding conversations, or isolating themselves from peers and family<br>▪ Shifts towards more extreme political, religious, or ideological views<br>▪ Belief that they are unfairly treated or targeted<br>▪ Accessing or sharing videos, posts, or websites promoting violence or intolerance<br>▪ Subscribing to or participating in online forums or social media groups with extremist ideologies |

## 8. Process for Reporting Safeguarding Concerns

### Safeguarding Process

**Stage 1 – Concern Identified**

**Person Responsible**
Delivery Team Member

**Timeline**
Any given moment

**1**

**Stage 2 – Immediate Staff Action**

**Person Responsible**
Delivery Team Member

**Timeline**
Immediately

**2**

**Stage 3 – Report the Safeguarding Concern**

**Person Responsible**
Delivery Team Member

**Timeline**
The same day the concern is identified or immediately if high risk/ urgent

**3**

**Stage 4 – Safeguarding Review**

**Person Responsible**
DSL/DSO

**Timeline**
Same day referral is received

**4**

**Stage 5 – Level 1 Threshold Decision**

**Person Responsible**
Specialist Coach

**Timeline**
Coach to agree suitable 'check ins' in between the normal scheduled interventions with the learner

Coach to provide updates to the Safeguarding Team monthly

**5**

**Stage 6 – Level 2 Threshold Decision**

**Person Responsible**
Specialist Coach or DSO dependent on learner preference

**Timeline**
Coach or DSO to hold frequent wellbeing interventions with the learner – frequency will vary from case to case

Bi-weekly wellbeing updates between Coach and SG Team

**6**

**Stage 7 – Level 3 Threshold Decision**

**Person Responsible**
DSL/DSO

**Timeline**
Immediate referral made to the Local Authority Adult Safeguarding or Children's Social Care (16-18)

Immediate contact made with the learner

Regular, ongoing contact until risk lowers (daily if required)

**7**

**Stage 8 – Level 4 Threshold Decision**

**Person Responsible**
Whoever speaks with the learner first

**Timeline**
Immediate call to emergency services and Children's Social Care (16-18)

Immediate call to DSL

Log incident on the same day as incident

Weekly ongoing contact with the learner to ensure safety

**8**

**Stage 9 – External Agency Involvement**

**Person Responsible**
DSL/DSO

**Timeline**
Ongoing contact to be maintained, frequency will be dependent on risk

**9**

**Stage 10 – Ongoing Monitoring and Review**

**Person Responsible**
DSL/DSO

**Timeline**
Ongoing contact, frequency will be dependent on the individual case

**10**

| The following process supports Instep's Spot, Speak, Support safeguarding approach | |
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| **Stage** | **Guidance** |
| **1** | You may have noticed a behavioural change or a welfare need. The learner may disclose information to you, or the learners line manager may have raised a concern themselves. Equally, attendance or participation data may show concerning trends. |
| **2** | Remain calm and listen without judgement. Do not investigate and do not promise confidentiality. Record a factual account of the situation and explain that a concern will be reported to Instep's Safeguarding Team. |
| **3** | Log the concern in Aptem using the Safeguarding Referral Form **(See Appendix A).** This will be sent automatically to [safeguarding@instepuk.com](mailto:safeguarding@instepuk.com)<br>If the learner is high risk call the DSL immediately on **07849 643815** before completing the Referral Form.<br>If there is immediate danger or risk to life call **999** immediately **(*Stage 8 of the Process*)** and alert the DSL at the most suitable time. |
| **4** | A member of the Safeguarding Team will review the details received in the SG inbox. They will review any previous safeguarding history pertaining to the learner.<br>A Level 1-4 Threshold Framework will be applied to the concern raised, and appropriate action will be determined. **(See Appendix B)** |
| **5** | Examples of Level 1 concerns are low/moderate stress or anxiety, early disengagement or work/life pressures.<br>Coach-led pastoral support is to be offered in these situations and more frequent touch points are advised with the learner during this time. A safeguarding marker is to be raised on the learner's Aptem profile (this is not visible to the learner) which will ensure the learner is pulled into Instep's inclusion data.<br>The Safeguarding Team will work closely with the Specialist Coach to agree appropriate channels of support and guide them around next steps. The Coach is required to follow through on this and provide updates to the Safeguarding Team on a monthly basis, escalating if the situation evolves. Equally they are to alert the Safeguarding Team if the situation has resolved. Once resolved the safeguarding marker can be changed to 'previous safeguarding concern' on the learners profile and the Safeguarding Team can archive the concern on the Low Level Concerns Log. |
| **6** | Examples of Level 2 concerns are persistent emotional distress, financial hardship, housing instability, repeated absence, mental health concerns.<br>If the learner is happy to receive support and guidance direct from the Safeguarding Team the team will make contact with the learner. If the learner wishes to liaise only with their Specialist Coach, the Safeguarding Team will provide the Specialist Coach will all the tools and information needed to support and signpost the learner accordingly. The safeguarding marker is applied to the learner's profile in Aptem for inclusion reporting purposes and the learner |

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| | details are added to the Safeguarding Register. The Safeguarding Team and the Specialist Coach will agree appropriate timeframes to review learner progress and wellbeing, often bi-weekly initially to be comfortable that the learner is accessing the appropriate support.<br><br>For learners aged 16–18 parental/carer involvement should normally be considered at this stage, unless doing so would increase risk to the learner. The DSL/DSO must also consider whether the concern is escalating toward significant harm and whether consultation with Children's Social Care is required. Level 2 for a 16–18 learner should be treated with heightened professional curiosity, as thresholds for escalation are lower.<br><br>Ongoing wellbeing check-ins must continue with the learner until a time that their situation has improved. Where is it safe and proportionate to do so the employer may also be involved in the communications and check-ins.<br><br>Once the safeguarding team are satisfied that all wellbeing concerns are removed, the learner risk will be archived from the live Safeguarding Register and the safeguarding marker applied to the learner's profile in Aptem can be changed to 'previous safeguarding concern'. |
| **7** | Examples of Level 3 concerns are domestic abuse, exploitation, coercive control, substance misuse affecting safety, significant self-harm concerns.<br><br>In these situations an immediate external referral to the Local Authority Adult Safeguarding Team will be made by the DSL, and SLT will be informed as appropriate.<br><br>For learners aged 16–18, Level 3 concerns must be treated as child protection matters. An immediate referral to Children's Social Care must be made where the threshold of significant harm is met. This may run alongside a Prevent referral where applicable. Parents/carers will normally be informed unless doing so would place the learner at further risk. The learner remains under close monitoring until Children's Social Care confirms risk reduction or closure. The DSL/DSO will contact the learner directly to offer immediate support and advice to reduce risk levels wherever possible. They will agree regular communication channels and appropriate frequency, daily where necessary.<br><br>A safeguarding marker will be applied to the learner's profile within Aptem and a detailed log of the concern and action taken will be recorded on the Safeguarding Register. Multi-agency intervention may follow alongside the regular support received from the DSL/DSO. Close, ongoing monitoring of the learners circumstances is needed to ensure there is no immediate risk to their safety and that support is being accessed and received. This continues until circumstances begin to improve and the levels of risk reduce. The learner will remain on the Safeguarding Register and under close monitor until circumstances have greatly improved and the learner is no longer believed to be at risk of harm. |
| **8** | Examples of Level 4 concerns are suicidal intent, immediate violence risk, severe crisis.<br><br>Should these situations arise, emergency services are to be contacted immediately. Following this, contact the DSL to report the incident.<br><br>For learners aged 16–18, emergency child protection procedures apply. Following emergency services involvement, Children's Social Care must be notified where appropriate. Parents/carers will normally be informed unless this increases risk. The DSL must ensure multi-agency child safeguarding coordination continues until risk is formally reduced.<br><br>When it is safe to do so, provide a detailed record of the incident on the Safeguarding Referral Form (if a Delivery Team Member is logging the concern) or immediately onto the |

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| | Safeguarding Register (if a member of the Safeguarding Team is directly responding to the concern).<br>Whilst awaiting for the emergency services to respond/arrive, maintain contact with the learner to offer reassurance and some positive distraction.<br>Once the learner is in the hands of the emergency services agree a suitable time to reconnect, the following day should be encouraged wherever possible.<br>Agree weekly wellbeing interventions with the learner to maintain suitable levels of contact and support, ensuring the learner accesses external support from specialist agencies as needed. All updates should be recorded on the Safeguarding Register. |
| **9** | Where there is external agency involvement ensure information is only shared proportionately. Ensure all referral dates are recorded on the Safeguarding Register and any outcomes documented. Whilst the learner is accessing external agency support ensure ongoing contact is maintained with the learner and the frequency of this is relevant to the level of risk. All contact and updates should be recorded on the Safeguarding Register. |
| **10** | For all Level 2 concerns and above it is important that the Safeguarding Team proactively reviews and monitors the learner's wellbeing and current situation. This includes regular wellbeing checks with the learner and Specialist Coach (and potentially the learner's line manager). Ongoing progress updates should be recorded on the Safeguarding Register, detailing the ongoing support offered and accessed by the learner. Threshold decisions will continually be reviewed to assess whether levels of risk have reduced or in fact increased. Where learners are no longer assessed as 'at risk' the safeguarding case will be closed and archived. The safeguarding marker on the learner's Aptem profile will also be changed to 'previous safeguarding concern' for inclusion data purposes. |

## 9. Prevent Duty

In 2010, the Government published the Prevent Duty (revised in 2023). It is a legal requirement for education providers to have arrangements in place to prevent people from being drawn into terrorism or extremist activities. It aims to promote awareness, early intervention, and safeguarding by ensuring staff are trained to spot signs of radicalisation and to take appropriate action to protect individuals at risk. The Prevent Duty is not about preventing learners from having political or religious views, but about supporting individuals to discuss or act on their views in non-extremist ways.

Instep UK takes the following steps to ensure compliance with the Prevent Duty:

**Establishing a Safeguarding Culture**
Emphasising the importance of preventing radicalisation with staff and learners. The dangers of radicalisation are fully embedded in our curriculum and are reinforced through discussions with learners during 121 Coach interventions, during masterclasses and through independent learning activities.
WISDOM and Safeguarding newsletters are shared with all stakeholders on a monthly basis to educate and raise further awareness. These resources are used during quarterly learning reviews to embed messages and encourage healthy dialogue. Learners are asked to apply this learning into their own workplace or personal context to ensure meaning and purpose.

**Staff Training and Awareness**
Periodic training for all staff takes place to help staff recognise the signs of radicalisation and extremism, and understand how to respond appropriately.

**Identify and Support Vulnerable Individuals**
Monitor learners for changes in behaviour or attitude that may indicate they are at risk. Offer appropriate support or intervention where needed.

**Create a Safe and Inclusive Environment**
Foster an environment of respect, tolerance, and inclusivity to reduce the risk factors associated with radicalisation.

**Work in Partnership with External Agencies**
Collaborate with local safeguarding boards, Prevent Coordinators, and other external agencies to share information and coordinate responses.

**Establish Clear Referral Procedures**
Ensure the Designated Safeguarding Team know how to make referrals to the Channel programme or other safeguarding services if concerns about radicalisation arise.
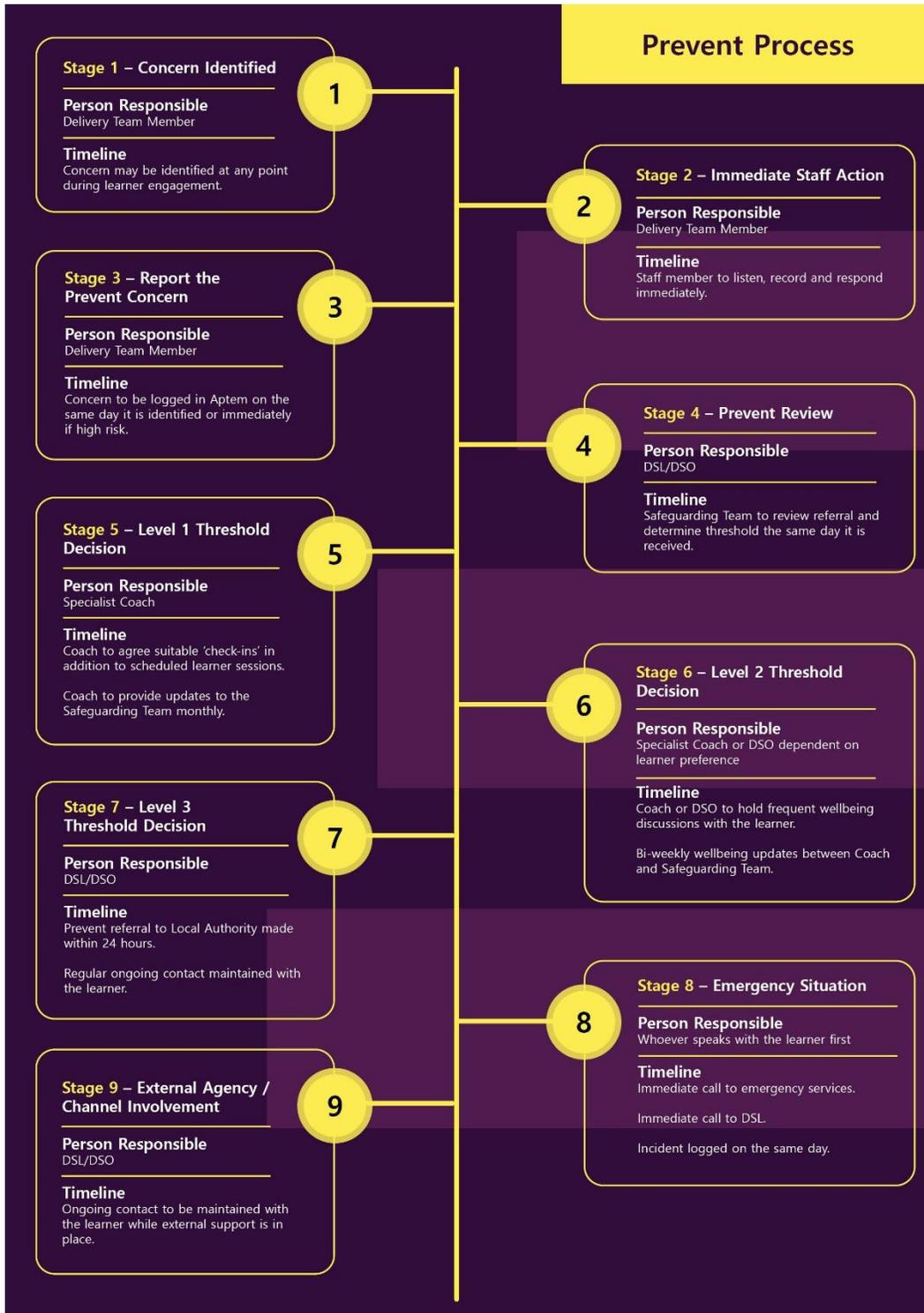
**Engage with Parents and Carers**
Keep families informed about the Prevent Duty and how they can support safeguarding efforts.

**Record and Document**
Keep detailed records of any concerns, referrals, and actions taken related to safeguarding and preventing radicalisation

# Process for Reporting Prevent Concerns

## Prevent Process

**Stage 1 – Concern Identified**

**Person Responsible**
Delivery Team Member

**Timeline**
Concern may be identified at any point during learner engagement.

**Stage 2 – Immediate Staff Action**

**Person Responsible**
Delivery Team Member

**Timeline**
Staff member to listen, record and respond immediately.

**Stage 3 – Report the Prevent Concern**

**Person Responsible**
Delivery Team Member

**Timeline**
Concern to be logged in Aptem on the same day it is identified or immediately if high risk.

**Stage 4 – Prevent Review**

**Person Responsible**
DSL/DSO

**Timeline**
Safeguarding Team to review referral and determine threshold the same day it is received.

**Stage 5 – Level 1 Threshold Decision**

**Person Responsible**
Specialist Coach

**Timeline**
Coach to agree suitable 'check-ins' in addition to scheduled learner sessions.

Coach to provide updates to the Safeguarding Team monthly.

**Stage 6 – Level 2 Threshold Decision**

**Person Responsible**
Specialist Coach or DSO dependent on learner preference

**Timeline**
Coach or DSO to hold frequent wellbeing discussions with the learner.

Bi-weekly wellbeing updates between Coach and Safeguarding Team.

**Stage 7 – Level 3 Threshold Decision**

**Person Responsible**
DSL/DSO

**Timeline**
Prevent referral to Local Authority made within 24 hours.

Regular ongoing contact maintained with the learner.

**Stage 8 – Emergency Situation**

**Person Responsible**
Whoever speaks with the learner first

**Timeline**
Immediate call to emergency services.

Immediate call to DSL.

Incident logged on the same day.

**Stage 9 – External Agency / Channel Involvement**

**Person Responsible**
DSL/DSO

**Timeline**
Ongoing contact to be maintained with the learner while external support is in place.

| The following process supports Instep's Spot, Speak, Support safeguarding approach | |
|---|---|
| **Stage** | **Guidance** |
| **1** | You may notice behavioural changes, concerning language, online activity or themes emerging during a coaching session, OTJ discussion or learner interaction. Concerns may also arise through employer feedback, engagement patterns or learner disclosure. Indicators may include grievance narratives, increased ideological language, isolation combined with extremist themes or justification of violence.<br>For learners aged 16–18, Prevent concerns must always be considered within child safeguarding legislation and vulnerability thresholds are lower. Prevent concerns are safeguarding concerns and must always be treated as such. |
| **2** | Remain calm and listen without judgement. Do not debate, investigate or challenge beliefs. Do not promise confidentiality. Record a factual account of the conversation, including exact words, where possible. Explain that the concern must be reported to Instep's Safeguarding Team.<br>For 16–18 learners, explain that safeguarding duties may require parental/carer involvement or referral to external safeguarding agencies where risk is identified. |
| **3** | Log the concern in Aptem using the Safeguarding Referral Form **(See Appendix A).** This will be sent automatically to [safeguarding@instepuk.com](mailto:safeguarding@instepuk.com)<br>If the learner is high risk call the DSL immediately on **07849 643815** before completing the Referral Form.<br>If there is immediate danger or risk to life call **999** immediately **(*Stage 7 of the Process*)** and alert the DSL at the most suitable time. |
| **4** | A member of the Safeguarding Team will review the concern, check any previous safeguarding or Prevent history and assess vulnerability factors. A Level 1–3 Prevent Threshold Framework will then be applied to determine the most appropriate course of action**. (See Appendix B)**<br>For learners aged 16–18, the DSL must also consider child protection thresholds and whether consultation with Children's Social Care is required. |
| **5** | Examples of Level 1 concerns may include isolated comments about political or ideological topics, curiosity around extremist narratives without endorsement, or early signs of grievance language. The Specialist Coach should offer pastoral discussion, promote critical thinking, reinforce British Values and encourage open dialogue. A safeguarding marker will be applied to the learner's Aptem profile and the situation will be monitored for patterns or escalation. The Safeguarding Team will provide guidance where required and monthly updates should be provided.<br>For learners aged 16–18, parental/carer involvement may be considered where appropriate to support early intervention and resilience building. |
| **6** | Examples include repeated grievance narratives, increasing "us vs them" language, engagement with extremist content or ideological themes combined with emotional vulnerability. The Safeguarding Team may contact the learner directly or support the Specialist Coach in delivering targeted guidance and signposting. The learner will be added to the Safeguarding Register and regular wellbeing check-ins will be agreed, often bi-weekly |

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| | initially. Informal advice may be sought from the Local Authority Prevent Team where appropriate. Employer involvement may also be considered where proportionate.<br>For learners aged 16–18, parental/carer involvement should normally be considered unless doing so would increase risk. The DSL must also consider whether the concern is escalating toward significant harm and whether consultation with Children's Social Care is required. |
| **7** | Examples include active support for extremist ideology, sharing extremist propaganda, advocating violence, contact with extremist networks or credible threats. The DSL will make a formal Prevent referral to the Local Authority and inform SLT where appropriate. Emergency services will be contacted immediately if there is any immediate risk to life. The DSL will maintain direct contact with the learner and multi-agency intervention may follow, including Channel Programme involvement where appropriate.<br>For learners aged 16–18, these concerns must also be treated as child protection matters. Referral to Children's Social Care must be considered where the threshold for significant harm is met, and parents/carers will normally be informed unless doing so would place the learner at further risk |
| **8** | Where external agencies are involved, (**See Appendix C**) information must be shared proportionately. Referral dates, actions and outcomes must be recorded on the Safeguarding Register. Ongoing contact with the learner should continue at a frequency proportionate to the level of risk. |
| **9** | For Level 2 concerns and above, the Safeguarding Team will continue to review the learner's wellbeing and risk level regularly. Threshold decisions will be reassessed as new information becomes available. Once risk has reduced and the learner is no longer considered vulnerable to radicalisation, the case will be closed and archived. The safeguarding marker on the learner's Aptem profile will be updated to 'previous safeguarding concern'. |

## 10. Unexplained Absence

Instep UK recognise that learners who disengage from education may be at increased risk of harm, exploitation, or abduction. Our organisation is committed to early identification and prompt action when a learner is absent without explanation. Staff are trained to monitor attendance regularly and to record all absences accurately. When a learner is identified as disengaged, designated staff will undertake immediate follow-up efforts, including contacting employers, families or guardians and, if necessary, collaborating with local authorities and relevant agencies.

If a learner remains unaccounted for, escalation procedures will be implemented, involving safeguarding referrals and partnership working with external agencies to locate the learner and ensure their safety. **(See Appendix C).**
We are committed to supporting learners to re-engage with education and to addressing any underlying issues that may have contributed to their absence, respecting their confidentiality throughout the process. Our proactive approach aims to safeguard the wellbeing of all learners and to prevent them from being at risk while 'missing' from education. Please see the ***Learner at Risk Policy*** for more information.

## 11. Staff Training and Development

Instep UK is committed to providing ongoing safeguarding training for all staff to ensure they are equipped to identify and respond effectively to safeguarding concerns, including those related to radicalisation and extremism.

**Training Requirements**
All staff must undertake safeguarding training (including associate deliverers) at induction and regularly update their knowledge as part of their continuous professional development. Training will include awareness of policies, procedures and responsibilities, with specific focus on the Prevent Duty and recognising signs of radicalisation. Designated safeguarding leads (DSL's) and safeguarding officers will receive enhanced training to enable them to lead safeguarding efforts and offer support to both staff and learners.

**Training Frequency**
Initial safeguarding training is provided upon commencement of employment with Instep UK. Refresher training is required bi-annually to ensure staff remain informed of current safeguarding practices and emerging issues. Additional targeted session may be provided related to specific safeguarding concerns or updates to legislation.

**Record Keeping**
We will maintain records of all safeguarding training attended by staff, including attendance certificates and the date the training was completed. This will be stored in HiBob. This data is also held on the Single Central Register Ensuring staff are trained appropriately is a priority to maintain a safe and inclusive environment for all learners and staff.

**Responsibility**
It is the responsibility of line managers and the Designated Safeguarding Team to ensure all teams complete the required training timely. Staff are expected to participate actively in safeguarding training and apply their knowledge in their daily practice.

## 12. Curriculum and Learning Environment

Instep UK is committed to providing a curriculum and learning environment that promotes the safety, wellbeing and development of all learners. This includes:

**Embedding Safeguarding in the Curriculum**
Integrating safeguarding topics, such as online safety, DEI, respect and mental health to raise awareness and empower learners to recognise and respond to concerns.

**Promoting a Positive and Inclusive Culture**
Creating an environment where learners feel safe, valued, and respected, regardless of their background, beliefs, or personal circumstances. We actively challenge discrimination, harassment, and bullying.

**Encouraging Open Communication**
Fostering a culture where learners feel comfortable discussing concerns or issues, knowing they will be listened to and supported.

**Supporting Wellbeing and Mental Health**
Providing opportunities for learners to access support for their emotional and mental health needs as part of a holistic safeguarding approach.

**Monitoring and Managing the Learning Environment**
Ensuring physical spaces are safe, welcoming, and conducive to learning. Clear codes of professional classroom conduct are in place for both physical and online sessions.

**Use of Digital Tools and Online Learning**
Promoting safe online practices, including educating learners about online safety, safeguarding against grooming, cyberbullying and online radicalisation.

**Learner Voice and Participation**
Encouraging learner involvement in shaping the learning environment and safeguarding practices, fostering ownership and responsibility.

## 13. Partnerships and External Agencies (See Appendix C)

Instep UK recognises that safeguarding is a collective responsibility and that effective collaboration with external agencies is essential to ensure the safety and wellbeing of our learners and staff. Our organisation is committed to working closely with local safeguarding boards, social care services, health providers, law enforcement, and other relevant organisations.

We will share information proportionately and responsibly, in line with data protection legislation, to support early intervention and coordinated safeguarding responses. Staff are trained to understand referral procedures and know how to escalate concerns promptly to external agencies.

We will actively participate in multi-agency safeguarding arrangements, case conferences, and early intervention initiatives to promote holistic support. Regular reviews of our partnership arrangements will be undertaken to ensure they remain effective, compliant with legal requirements, and aligned with best safeguarding practices. Through these collaborative efforts, we aim to create a safer environment for everyone in our community.

## 14. Supporting Learners and Staff

Instep UK are committed to providing support to anyone affected by safeguarding concerns or incidents. Immediate safety and well-being are our top priorities, and individuals will be encouraged to access safe spaces and speak with trusted staff or designated safeguarding leads. We will facilitate access to appropriate external support services, such as social services, mental health professionals, and specialist organisations, to ensure individuals receive the help they need.

All disclosures will be handled with sensitivity, confidentiality, and respect, in accordance with legal and safeguarding requirements. Ongoing emotional and psychological support, including counselling and advocacy services, will be offered to support recovery and wellbeing. We also recognise the importance of supporting staff involved in safeguarding incidents through supervision, debriefing, and access to professional support. Our aim is to create a safe environment where those affected feel supported, respected, and empowered to recover and move forward.

## 15. Whistleblowing

Instep UK encourages all staff, learners, and stakeholders to report any concerns related to safeguarding, misconduct, or unethical behaviour through our whistleblowing procedures. We are committed to creating a safe environment where individuals feel confident to raise concerns without fear of retaliation or discrimination.

Anyone who wishes to whistleblow can do so in confidence, knowing their concerns will be taken seriously and investigated thoroughly. Details of how to raise a concern, including contact points and alternative reporting channels, are available in our *Whistleblowing Policy*.

## 16. Safer Recruitment

Instep UK is committed to ensuring that all staff engaged in roles involving contact with their learners are suitable to work in such environments. Our safer recruitment procedures include rigorous background checks, including identity verification, obtaining references, and obtaining appropriate criminal record disclosures prior to appointment.

We also conduct interviews to assess the candidate's suitability and understanding of safeguarding responsibilities. All recruitment panels are trained in safer recruitment practices to ensure consistent and fair decision-making. Additionally, all staff receive safeguarding training and an induction that emphasises their responsibilities for safeguarding and promoting the welfare of those in our care.

We maintain secure records of all recruitment documentation and ensure compliance with legal and best practice requirements. Any concerns or issues identified during the recruitment process are thoroughly investigated, and unsuitable candidates are not employed or engaged.

## 17. Monitoring, Review and Evaluation

Safeguarding arrangements are regularly monitored, reviewed, and evaluated to ensure their ongoing effectiveness. The Designated Safeguarding Lead (DSL) oversees this process, conducting a formal review annually, with additional reviews following significant incidents or changes in legislation or best practice guidance.

A monthly Safeguarding Report is produced and shared with the Board of Directors for review and challenge. The SLT Lead for Safeguarding will discuss arrangements, open cases and future plans to maintain and build upon Instep UK's safeguarding culture.

Ongoing evaluation involves gathering feedback from staff, learners, and other stakeholders through surveys and discussions, as well as analysing safeguarding case records and incident reports. Training and policies are updated accordingly to reflect lessons learned, ensuring that our safeguarding practices remain current, effective, and compliant with legal requirements. This cycle of continuous review and improvement demonstrates our commitment to maintaining a safe environment for all.

## 18. Policy Implementation and Dissemination

The Safeguarding and Prevent Policy is shared and discussed with all new staff as part of their Instep UK induction. Following this all staff receive a formal safeguarding induction, delivered by the Designated Safeguarding lead.

The latest version of the Safeguarding and Prevent Policy is accessible via HiBob and is also published on Instep UK's website. Any in year updates or amendments are communicated to the whole organisation via the HiBob communications page. These communications are then followed up by line managers during their team meetings to ensure all staff are aware and understand any implications as a result of the changes made.

Learners are made aware of the Policy during their Programme Appraisal and have a 'Welcome to Your Apprenticeship' module to complete in their initial weeks on programme, which reinforces key safeguarding messages. During each learning intervention learners are reminded of our Policy, whilst their wellbeing is being discussed. Instep UK's Safeguarding and Prevent Policy is located within the Key Documents section of Aptem (The Learning Management System) which learners can access and review at any time.

## 19. Associated Documents

**Appendix A:**

**Link to Safeguarding Form.**

**Appendix B:**

**Link to Safeguarding and Prevent Threshold Guidance.**

**Appendix C:**

**Safeguarding & Prevent External Contacts**

Where a safeguarding concern requires referral to external agencies, the Designated Safeguarding Lead will normally coordinate contact with the relevant Local Authority safeguarding team for the learner's home area.

**Emergency Services**
Emergency (immediate danger) – **999**

**Police (non-emergency)**
Telephone – **101**

**NSPCC Helpline**
For safeguarding concerns about children
Telephone – **0808 800 5000**
Website – https://www.nspcc.org.uk

**Childline (for under 19s)**
Telephone – **0800 1111**
Website – https://www.childline.org.uk

**Adult Safeguarding (Local Authority)**
Contact the safeguarding team for the learner's local authority area.

**Children's Social Care (Local Authority)**
Contact the children's services team for the learner's local authority area.

**Local Authority Prevent Team**
Concerns about radicalisation should be referred via the Local Authority Prevent Team or through the DSL.

**Modern Slavery Helpline**
Telephone – **08000 121 700**
Website – https://www.modernslaveryhelpline.org

**National Domestic Abuse Helpline**
Telephone – **0808 2000 247**
Website – https://www.nationaldahelpline.org.uk

**Samaritans (24-hour support)**
Telephone – **116 123**
Website – https://www.samaritans.org

**Shout Crisis Text Service**
Text **SHOUT** to **85258**

**Prevent Referral Support**
Prevent advice line – **0800 011 3764**

**Report Terrorist Content Online**
https://www.gov.uk/report-terrorism

| Policy Owner | Designated Safeguarding Lead – Tracey Carter |
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