Step2Skills

Safeguarding Policy

V8.5 November 2023

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1 Introduction

Hertfordshire County Council's Step2Skills service places the highest importance on safeguarding. Our commitment to safeguarding and wellbeing applies to our learners and apprentices, based across Hertfordshire (and beyond Hertfordshire), taught by our own Skills Teams and sub-contractors, as well as our participants accessing projects, our subcontractor partners, service level agreement partners, staff team and volunteers.

We work with all adult learners, but our aim is to particularly focus on working with adults who face barriers to education and employment such as low skills, learning or physical disabilities and mental health issues.

Adult safeguarding, under the Care Act 2014, is primarily aimed at protecting adults with care and support needs from abuse and neglect, which will apply to some learners and participants but not all.

Adult safeguarding is defined as:

- protecting an adult's right to live in safety, free from abuse and neglect.

The safeguarding principles and procedures that also apply are the same as those for safeguarding children and young people. Our learners and participants may have experienced abuse at a younger age, which only reveals itself as an adult.

In relation to children and young people, safeguarding and promoting their welfare is defined as:

- protecting children from maltreatment
- preventing impairment of children's health or development
- ensuring that children and young people are growing up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children and young people to have the best outcomes.

Safeguarding action may be needed to protect learners/participants and their children, if applicable, from:

- neglect
- physical abuse
- sexual abuse
- emotional abuse
- bullying, including online bullying and prejudice-based bullying
- racist, disability and homophobic or transphobic abuse
- gender-based violence/violence against women and girls
- serious youth violence, particularly affecting children and young adults who have been excluded, have experienced trauma and have been involved in offending
- so-called honour-based abuse
- domestic abuse
- Mental health

- sexual violence and harassment including online sexual abuse between children and learners. Online abuse can include sending abusive, harassing and misogynistic messages; sharing nude and semi-nude images and videos; and coercing others to make and share sexual imagery
- sexual violence between children and learners
- upskirting (taking a picture of someone's genitals or buttocks under their clothing without them knowing, either for sexual gratification or to humiliate or distress the individual. It is a criminal offence)
- child sexual exploitation and trafficking
- child criminal exploitation, including county lines
- radicalisation and/or extremist behaviour
- risks linked to using technology and social media, including online bullying; the risks of being groomed online for exploitation or radicalisation; and risks of accessing and generating inappropriate content, for example youth produced sexual imagery
- teenage relationship abuse
- substance misuse
- female genital mutilation
- forced marriage
- fabricated or induced illness
- homelessness
- other issues not listed here but that pose a risk to children, learners and vulnerable adults

For more information on each of these, please refer to Keeping children safe in education 2023 (publishing.service.gov.uk)

Safeguarding is not just about protecting children, learners and adults from deliberate harm, neglect and failure to act. Although these are not inherently safeguarding issues, other aspects of care and education can be associated with heightened risks of harm. These include:

- children's and learners' health and safety and well-being, including their mental health
- meeting the needs of children and learners who have special educational needs and/or disabilities (SEND)
- the use of reasonable force
- meeting the needs of children and learners with medical conditions
- attendance of learners - All teachers will contact learners via text or phone call following an *unexplained* absence and this will be made clear to the learners during induction. If a learner is absent and has not contacted us, we will contact the learner by phone, text or email. If after 3 attempts we have not heard from the learner, we will phone the emergency contact. If we have reason to be concerned about a learner's wellbeing, we will phone your emergency contact after 1 attempt.
- providing first aid

- educational visits
- emotional well-being
- online safety and associated issues
- appropriate arrangements to ensure children's and learners' security, taking into account the local context

This policy outlines Step2Skills procedures when responding to safeguarding concerns for adults with care and support needs. It will be promoted at induction and reinforced through regular training.

2 Implementation

Step2Skills actively encourage its leaders, Advisory Board Members and managers to create a positive culture and ethos, where safeguarding is understood to be everyone's responsibility and an important part of everyday life, backed up by training at every level.

All staff members will be supported to have a good awareness of the signs that a learner, participant or their child is being neglected or abused and be able to follow procedures to respond appropriately and sensitively to concerns.

All staff members will be trained in Prevent, recognising factors that may make someone more susceptible to be drawn into terrorism.

Safeguarding will be promoted throughout the recruitment process, from selection to appointment, to ensure all required checks are completed prior to the appointment of any individual, including the Disclosure and Barring Service (DBS) Enhanced checks, in line with the Safe Staffing policy approved by HCC Safe Staffing team. A Single Central Record will be kept with this information. DBS checks will be rechecked in line with HCC policy. Following on from appointment, an induction process will be put in place for new employees which will include safeguarding training.

Step2Skills will expect all partners to endorse the same commitment to safeguarding within their organisation.

3 Roles and Responsibilities

Safeguarding Team:

Step2Skills has a Designated Safeguarding Lead, a Deputy Designated Safeguarding Lead and a safeguarding team. This includes a further five staff trained as Deputy Designated Safeguarding Leads, to ensure safeguarding is always covered. The team meets regularly.

Advisory Board

The Step2Skills Advisory Board will liaise with the Safeguarding Lead over safeguarding matters and ensure that the policy is annually updated and being complied with. They will ensure there is a positive ethos with safeguarding being an important part of everyday life.

They will work with the team, providing support and challenge to leaders, to ensure safeguarding is effective. They will undertake regular training to ensure they can assist in these duties. A Step2Skills Advisory Board member has been identified as the safeguarding lead.

Role of Designated Safeguarding Lead

- The Designated Safeguarding Lead (DSL) or someone from the safeguarding team, will be available to discuss safeguarding concerns
- Referring cases – if cases need referring, the DSL will make referrals to the local authority for children or adults, the Channel programme where there is a radicalisation concern, the DBS service where needed and the police where a crime has been committed
- Working with others – the DSL will work closely with staff, safeguarding partners, our own partners and any other professionals as required
- Keeping accurate records of concern and a central *At Risk* register. Keeping records confidential, in line with GDPR and knowing the principles which allows both the sharing and withholding of information
- Raising awareness and ensuring all staff have access to and understand this safeguarding policy
- Training, Knowledge and Skills - to ensure the safeguarding team have updated DSL training every two years and to attend other training and any reading to keep up to date on all areas
- To ensure staff have safeguarding and Prevent training at induction and then Prevent training renewed every two years and safeguarding and child protection every three years, with at least an annual refresher.
- Providing support to staff for any safeguarding issues
- Holding and sharing information – to keep detailed, accurate written records of concern and referrals and to understand the sharing of information within Step2Skills and with safeguarding partners and organisations.

The Deputy Designated Safeguarding Lead (DDSL) will support the DSL in carrying out this role.

Step2Skills will:

- Annually review the following policies ensuring guidance for subcontractors and expectations for learners: Safeguarding Policy, Learner behaviour policy, Code of conduct policy which forms part of the procurement process
- Issue Safeguarding leaflets and posters for learners/participants that in house teams and partners/subcontractors must display
- Issue newsletters to Partners
- Ensure that adequate Safeguarding policies and procedures are in place with all partners/subcontractors and monitor actions identified as part of the Quality Monitoring (QM) or Quality Improvement Plan (QIP)
- Implement an audit system to check that Safeguarding procedures are effective for all partners/subcontractors.

All Delivery Partners involved in Skills and/or Employment Support interventions will:

- Have a safeguarding policy submitted to Step2Skills for approval prior to procurement
- Have a Prevent Policy / procedure
- Have an up-to-date Health and Safety policy and adequate Health and Safety procedures in place including incident logs
- Have robust recording and monitoring practices of Safeguarding incidents/cases
- Ensure safeguarding concerns are escalated and managed by the partner's DSL and raised with Step2Skills safeguarding team
- Promote safeguarding throughout its recruitment process and ensure that adequate Disclosure Barring Service (DBS) checks have been completed on partners/subcontractors' staff members
- Identify and communicate to Step2Skills the name of a Designated Safeguarding Lead (DSL) and a Deputy Designated Safeguarding Lead (DDSL) responsible for acting as "referrer" as detailed in the Hertfordshire Safeguarding Adult Board (HSAB) and Hertfordshire Safeguarding Children Board (HSCB) multi agency policy and procedure

In the context of delivering adult education, Step2Skills Subcontractors and delivery partners will also:

- Provide Step2Skills with a list of safeguarding and Prevent CPD completed by staff
- Staff to have safeguarding and Prevent training every 3 years
- Clearly communicate their behaviour expectations with their learners/participants
- The DSL and DDSL will have completed Designated Safeguarding Lead training or equivalent every two years
- Ensure learners/participants know how to complain or share concerns
- Inform Step2Skills of any safeguarding incidents involving Step2Skills learners/participants and detail actions taken using the Step2Skills proforma and **within a maximum of 48 hours** of the incident
- Ensure that staff and other adults receive regular supervision and support if they are working directly with learners/participants whose safety might be at risk
- Have a safer recruitment policy and provide Step2Skills with a copy
- Have a safe staffing policy including lone working arrangements
- Have an up to date and effective IT Acceptable Use Policy
- Hold a Single Central Record of DBS checks for their organisation
- Understand and apply expectations and principles of Inspecting Safeguarding in Early Years, Education and Skills settings and Keeping Children Safe in Education
- Establish clear lines of communication and reporting procedures when courses are delivered in centres that have their own designated person for safeguarding e.g. schools, day care centres
- Ensure that teachers working in community venues, particularly those outside of standard school hours, are aware of emergency procedures.

All Staff (to include sessional teachers and volunteers)will:

- Be aware of their responsibility for safeguarding
- Establish and maintain an ethos where those who are vulnerable feel secure to talk and know they will be listened to
- Ensure safeguarding information is shared
- Promote British Values
- Know the safeguarding policy and keep up to date with training
- Understand and follow the safeguarding procedure if they have a safeguarding or Prevent concern and report to the DSL or DDSL.
- Be aware of the higher risk of safeguarding for those with more vulnerabilities
- |Complete all required training in a timely manner

4 Reporting a Concern

When to be concerned

Knowing what to look for is vital for the early signs of abuse. All staff should be aware of the signs of abuse, so they know what they are looking for. Safeguarding concerns can be identified from a range of situations as detailed in this policy. It is vital to be aware of changes and signs and to report as soon as you have a concern.

Early Help

All staff should be aware of the need for early help, which means providing support as soon as it emerges in order to prevent a safeguarding concern. This should be discussed with the DSL and could involve working with other professionals.

The areas of abuse recognised in the Care Act 2014 are:

Physical – including assault, hitting, slapping, pushing, kicking, misuse of medication, restraint or inappropriate sanctions.

- **Signs include:** unexplained burns, scratches, bruising or abrasions, drowsiness from misuse of medication and anxiety in the presence of abuser.

Sexual – may include rape and sexual assault or sexual acts to which the vulnerable adults has not consented, or could not consent or was pressured into consenting, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts.

- **Signs include:** changes in behaviour, torn, stained or bloody underclothing, difficulties in walking or sitting and sexualised behaviour.

Psychological/emotional – threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation and unreasonable and unjustified withdrawal of services or supportive networks.

- **Signs include** fear, passivity, confusion, apathy, lack of eye contact, low self-esteem, disturbed sleep patterns and reluctance to talk openly.

Financial or material – including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions or the misuse or misappropriation of property, possessions, or benefits

- **Signs include**: loss of jewellery and personal property, lack of money to purchase basic items, inadequate clothing, loss of money from wallet or purse.

Neglect and acts of omission – including ignoring medical or physical care needs, emotional or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate heating and nutrition.

- **Signs include**: dehydration, infections, malnutrition, and hypothermia

Discriminatory – including verbal and physical abuse, bullying and harassment based on the individual's age, gender, disability, religion or belief, race or ethnicity or sexual orientation. Recognised signs may be very similar to psychological and emotional abuse

Domestic Violence – Since December 2015 coercive or controlling behaviour has also been criminalised.

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

Organisational – Including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

Self-neglect – This covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding. It should be noted that self-neglect may not prompt a section 42 enquiry. An assessment should be made on a case-by-case basis. A decision on whether a response is required under safeguarding will depend on the adult's ability to protect themselves by controlling their own behaviour. There may come a point when they are no longer able to do this, without external support.

Although **sexual violence and sexual harassment** is not recognised in the care act as an area of abuse, Step2SKills are aware that this can be a problem, particularly in the workplace and as we have apprentices in the workplace and are also supporting learners and participants into work, we ensure they have someone they could report concerns to if there was a problem.

Some adult learners will be more vulnerable and at risk than others:

- With a learning difficulty, disability or sensory impairment
- With special educational needs
- Poor mental health
- Dependency or history of dependency – drugs, alcohol, gambling
- Social isolation
- Academic failure
- Poor-quality long-term relationships
- Family abuse / violence now or in the past

How to Deal with a concern

If a member of staff has a concern or an adult discloses something:

- Listen attentively without judgement
- Assure the person they will be taken seriously
- Do not promise confidentiality
- Use questions to clarify e.g. TED – Tell me more, Explain, Describe
- Do not display any emotional response
- With the person summarise what has been said to ensure it is accurate
- Record what you have seen / been told on the record of concern form
- Report straight away to a DSL or DDSL

Step2Skills Staff:

Contact the DSL or a DDSL to discuss a concern or report a concern (see appendix 3).

Sub-Contractors and delivery partners:

Go straight to your own DSL to report the concern (see appendix 2). The DSL will follow up the concern in line with their policy and report to Step2Skills DSL/ DDSL using the record of concern form (see appendix 4), with 48 hours of receiving the concern. The DSL or DDSL can be communicated with by phone or by emailing
Step2Skills.safeguarding@hertfordshire.gov.uk
This email box is checked at least twice a day for messages.
See appendix 2

Support

Disclosures and safeguarding situations can be very stressful, so if you need support speak to your DSL/ DDSL.

Record Keeping

All concerns, discussions, decisions made and the reasons for those, will be recorded in writing.
An At Risk Register will be maintained for concerns identified as safeguarding cases and these will be followed through until the adult is known to be safe, when the case will be closed.

Sub-contractors and delivery partners will have their own records of concern. They will also fill in a Step2Skills record of concern form, for any Step2Skills learner with a safeguarding concern which has been identified, and ensure it is passed on within 48 hours (see appendix 4). Step2Skills DSL/DDSL will see what has happened for a learner/participant and ensure that all safeguarding aspects have been covered. Step2Skills DSL/DDSL will liaise with sub-contractors and delivery partners to ask for further clarification, identifying anything that has been missed and continue to get updates on the cases.

The DSL or DDSL will keep all records updated and the level of risk will be identified on the At Risk register.

Step2Skills Procedures

If any member of staff has concerns about an adult, they will inform the DSL, Deputy DSL or if unreachable, a member of the Safeguarding team. The DSL will decide whether the concerns are deemed to have met a threshold and whether a referral needs to be made or the police need to be informed.

Any member of staff can make a referral and if they do so, will need to inform the DSL/Deputy DSL of this as soon as possible. (See appendix 3).

5 Allegations

Keeping yourself safe

As part of induction, all staff will be asked to read the Step2Skills Professional Boundary Guidance document. These guidelines aim to outline good practice and protect from potential allegations and low-level concerns.

Low Level Concerns

A low-level concern is a concern that a staff member has acted in a way that:

- Is inconsistent with the staff code of conduct
- Does not meet the allegations threshold or is not considered serious enough for a LADO referral

Examples of low-level concern could be:

- Using offensive language
- Being over friendly with the learners /participants

Low level concerns should be reported to the line manager in the first instance. The line manager will decide as to whether the Designated Safeguarding Lead (DSL) or Deputy Designated Safeguarding lead (DDSL) needs to be informed. Concerns will be recorded with the action taken.

Allegations involving staff or volunteers

If there is a concern, or an allegation made about a member of staff or volunteer, contact the line manager in the first instance. The line manager will make a decision as to whether the Designated Safeguarding Lead (DSL) or Deputy Designated Safeguarding lead (DDSL) needs to be informed. If the allegation relates to the line manager then report to Step2SKills Head of Service. If the allegation relates to the Step2Skills Head of Service, then contact the Chair of the Step2Skills Advisory Board via the Clerk to the Advisory Board, Elizabeth Hill Elizabeth.hill@hertfordshire.gov.uk and the Head of Service's Line Manager. If the allegation relates to a member of the Advisory Board, report to Head of Service. A decision will be made about whether it is a safeguarding concern and what action will need to be taken. See Appendix 5.

If this relates to an incident with a child or young person, and if appropriate, the LADO (Local Authority Designated Officer) will be informed and any actions followed.

If you feel your concerns are not being taken seriously then contact the LADO directly on lado.referral@hertfordshire.gov.uk or call the police on 101.

If the LADO does not need to be informed an investigation will take place in line with the HCC Whistle Blowing Policy Whistleblowing Policy - HCC (hertfordshire.gov.uk) or in line with the HCC disciplinary policy.

Sub-contractors / Partners need to report any safeguarding allegations made against their staff to the DSL / DDSL.

6 Prevent

In 2010 the Government published the Prevent Strategy, a national programme to stop people becoming radicalised or supporting terrorism. In 2012 Channel, a key element of PREVENT, produced a guide for Local Partnerships protecting vulnerable people from being drawn into terrorism. In recent years there has been an awareness of the specific need to safeguard children, young people and families from violent extremism.

Radicalisation is persuading someone to adopt an extremist cause

Extremism is the vocal or active opposition to the fundamental values, including democracy, the rule of law, individual liberty, and respect and tolerance for different faiths and beliefs.

Terrorism is a violent action based on an ideology that:

- Endangers a person's life
- Involves serious violence against a person
- Causes serious damage to property
- Creates a serious risk to the public health and safety
- Interferes with or seriously disrupts an electronic system

Signs someone may be at risk of being radicalised – this is not an exhaustive list and none of these may be present:

- A change of behaviour
- Becoming withdrawn or isolated
- Being influenced by a group
- The need for identity
- Refusal to listen to other view points
- Becoming abusive towards others who are different
- Changing friends and appearance
- Feeling persecuted
- Being sympathetic to extremist ideologies and groups
- Changes in online behaviour

The Channel programme provides tailored support for a person susceptible to being drawn into terrorism. All referrals are carefully assessed to see if they are suitable for Channel. If they are, a multi-agency Channel panel meet to discuss the referral and decide on the package of support.

Herts Prevent Coordinator is Sophie Lawrence – tel 01992 555514 and 07773094897.

Step2Skills' DSLs in relation to protecting individuals from radicalisation and involvement in terrorism are, Chantal Lommel, Step2Skills Head of Service, and Fay Brett DDSL. Chantal Lommel is the single point of contact (SPOC) for PREVENT within Step2Skills.

When a member of staff (Step2Skills or partner/subcontractor staff member) has any concerns that a learner/participant may be at risk of radicalisation or involvement in terrorism, they should speak immediately with one of Step2Skills' Safeguarding Team or their own safeguarding team. The check process should be undertaken to see whether there is enough information leading to a real concern and whether it needs referral to Channel or to the police in the case of an emergency.

If there is enough information leading to a concern, a safeguarding concern should be raised to the DSL via the Safeguarding Incident Form. The DSL will contact the local authority to discuss whether there is enough for a referral. Advice will then be given and a decision taken as to whether it meets the criteria for a Channel referral to be made. If it meets the criteria, a referral form will then be submitted. Subcontractors' SPOCs should inform Step2Skills if they make a referral.

Step2Skills Curriculum Team leaders, subcontractors' managers and teachers will ensure that British Values are embedded in staff training and learner curriculum, where relevant, to protect learners and participants from radicalisation and extremist views. When delivering the curriculum, teachers will consider how to equip learners in becoming responsible and respectful citizens. This will include the fostering of an atmosphere where

all citizens are respected and protected by law (regardless of their background, gender, creed, age etc.) and where diversity can be celebrated.

This also applies to participants on projects. Step2Skills staff will ensure they are aware of participants who may be susceptible to being radicalised. They will reinforce the British Values through the work they carry out with their participants.

Step2Skills have a Prevent Risk assessment in place.

7 Health and Safety

Step2Skills will ensure that partners, subcontractors and Step2Skills Skills team will carry out Health and Safety Accommodation Checks on learning environments. They will report any immediate concerns/hazards should accommodation arrangements have been changed and concerns have become apparent as a result.

Step2Skills teachers should follow H&S procedures from the centres/partner/ subcontractors whilst on their premises. Should an incident occur, Step2Skills teachers should report H&S incidents to the partner/subcontractor/centre and update the accident/incident log.

Step2Skills Contract and Commissioning Officers (CCMOs) will collate information about H&S incidents from subcontractors.

Step2Skills Business Support Team will collate information about H&S incidents in HCC offices should it occur.

Learning activities should take Health and Safety matters into account as part of the lesson planning process. This can include a wide range of considerations, such as: the safe use of technology (trailing leads, use of safety equipment, correct working practice).

Personal safety in activity, particularly in physical activity: H&S risk assessments should be conducted where appropriate to ensure health and safety needs are being met in and outside of the classroom and learners/participants are not being put at risk.

8 Anti-Bullying

Step2Skills believes that all learners/participants have the right to learn and be supported in a safe and secure environment without fear of being bullied. Bullying is anti-social behaviour, is unacceptable and will not be tolerated.

Expectations will be set with learners at the start of courses and at the first meeting between an employment adviser or job coach and participant.

Definition of bullying

For the purposes of this statement, Step2Skills regards bullying as a repetitive and, very often, premeditated series of behaviours designed to hurt, intimidate, humiliate or embarrass a person or group of individuals. Bullying can take many forms, including any of the following:

- 'Picking on' someone and causing them distress or discomfort
- Unwanted physical contact or abusive comments regarding someone's race, gender, sexuality, disability, culture or religion
- Inappropriate use of photography including up skirting
- Abusive or patronising language or gestures, jokes or remarks
- Discriminatory and derogatory language – this includes language that is derogatory about disabled people, homophobic and racist language or any language or gestures that incite hatred towards any individual or group of individuals
- Sexual harassment
- Constant interruption, shouting or undermining someone
- Being subjected to threatening or embarrassing e-mails, mobile telephone or multimedia messages, pictures or videos which are often referred to as cyber-bullying. This includes sexting
- Being humiliated via inappropriate use of websites
- Damaging other people's goods and property
- Being ignored and isolated.

See Appendix 1 for advice on what an individual should do if they feel they are a victim of bullying, harassment or anti-social behaviour.

The following steps will be taken when dealing with incidents of bullying:

- All staff are responsible for immediately challenging inappropriate comments or behaviours which can be perceived as discriminatory, bullying or harassment
- If bullying is suspected or reported, the incident will be dealt with immediately by the member of staff who has been approached
- A clear and factual account of the incident will be recorded and given to the partner/subcontractor's Designated Safeguarding Lead by using the standard Safeguarding Incident Report form
- The partner/subcontractor's Designated Lead will then investigate the incident and take any appropriate action
- The partner/subcontractor's Designated Lead will report the incident and results of the investigation within 48 hours to the Step2Skills Safeguarding Team.

If the learner/participant is not satisfied with how the incident has been dealt with, they will be directed to the Step2Skills Complaints and Compliments Policy.

Step2Skills adheres to HCC's staffing policy regarding bullying and harassment. All Step2Skills staff members are expected to complete an HCC e-learning module to

understand their roles and responsibilities. Step2Skills staff members are expected to be proactive in fostering an environment where staff feel free of bullying and harassment and, if necessary, know what steps to take to report concerns.

As part of contract management processes, Step2Skills will continue to foster an environment where partner/subcontractors consider their staff's wellbeing. Though Step2Skills has little legal leverage to enforce good practice across subcontractors with regards to staff bullying and harassment, Step2Skills will put in place systems to monitor subcontractors' protocols in promoting such environment and in protecting their staff from bullying and harassment.

9 Anti-discrimination Statement

Step2Skills are committed to promoting equality of opportunity and ensuring that each learner/participant is able to access learning and support to enhance their skills and have a positive learning experience. Our aim is:

- To actively promote the principles and ideals of equality and inclusion
- To assess learners'/participants' needs and provide any additional support requirements
- Not to tolerate any form of discrimination and deal with complaints efficiently and effectively.

10 Online Safety

All learners and participants should be supported to understand the risks posed by using technology, including the internet. They need to be made aware of the four areas of risk:

content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.

contact: being subjected to harmful online interaction with other users; for example peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

conduct: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and nonconsensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying

commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (https://apwg.org/)

Partners/subcontractors will have well-developed strategies in place to keep learners/participants and children safe. Partners/subcontractors will support their

learners/participants to develop their own understanding of these risks and to learn how to keep themselves and others safe. Support and guidance are available from Step2Skills and there are many useful resources on the internet to support people with online safety, including this one: https://www.getsafeonline.org/.

Step2Skills and partners/subcontractors' leaders and managers will oversee the safe use of computers and mobile technology when learners/participants and children are in their care and act immediately if they are concerned about their learners/participants' online safety.

Filtering systems will be in place or controls to manage this if teachers are teaching in a community setting. Teachers will monitor learner activity if learners are using their own devices in a face to face lesson or if they have borrowed computer equipment from Step2Skills.

All classes must include guidance related to online safety that is appropriate to the level and duration of the course. The online component of the class must be explicitly stated on the lesson plan. Further guidance can be found here Teaching online safety in schools - GOV.UK (www.gov.uk).

Step2Skills has a Code of Conduct Policy which sets out expected behaviour for learners, face to face and online which, needs to be read alongside this section for more information.

This policy sits alongside other policies and documents which relate to safeguarding responsibilities:

- Professional Boundary Guidance
- Safer Recruitment Policy
- Code of Conduct
- Online Learning Policy
- Lone Working Policy
- Part 1 of 'Keeping Children Safe in Education'
- Annex A, a condensed version of part 1 KCSIE for those staff who do not work directly with children
- HCC Whistle Blowing Policy
- HCC Joining Policy
- HCC Safe Staffing Policy
- HCC Code of Conduct

Further Documents for Reference:

Keeping Children Safe in Education

Working Together to Safeguard Children 2018 (publishing.service.gov.uk)

Education Act 2002 (legislation.gov.uk)

Children Act 1989 (legislation.gov.uk) Children Act 2004 (legislation.gov.uk)

HM Government - Multi-agency statutory guidance on Female Genital Mutilation (publishing.service.gov.uk)

Human Rights Act 1998 (legislation.gov.uk)

European Convention on Human Rights - ECHR Official Texts - ECHR - ECHR / CEDH (coe.int)

Equality Act 2010 (legislation.gov.uk)

Public Sector Equality Duty | Equality and Human Rights Commission (equalityhumanrights.com)

Prevent duty guidance: Guidance for specified authorities in England and Wales (publishing.service.gov.uk)

What to do if you are worried a child is being abused

Educate Against Hate - Prevent Radicalisation & Extremism

ACT Early | Prevent radicalisation

11 Review

Policy managed by: Safeguarding Diversity & Inclusion Lead
Next Review date: August 2024

12 Appendices

Appendix 1 What you should do if you feel you are a victim of bullying, harassment or anti-social behaviour.

If you are a member of staff or a learner/participant and you believe that you are being bullied or harassed, you should:

- Let the perpetrator know you are unhappy with their behaviour and ask them to stop if you feel able to do so.
- If unable to confront the aggressor, then you should talk about it with your teacher, employment adviser or another trusted member of staff including volunteers.

If unable to resolve the matter informally the person you spoke to will be able to give advice on what to do next. Your complaint will be processed through a formal procedure, which will include an investigation of all parties concerned. Any relevant evidence will be examined.

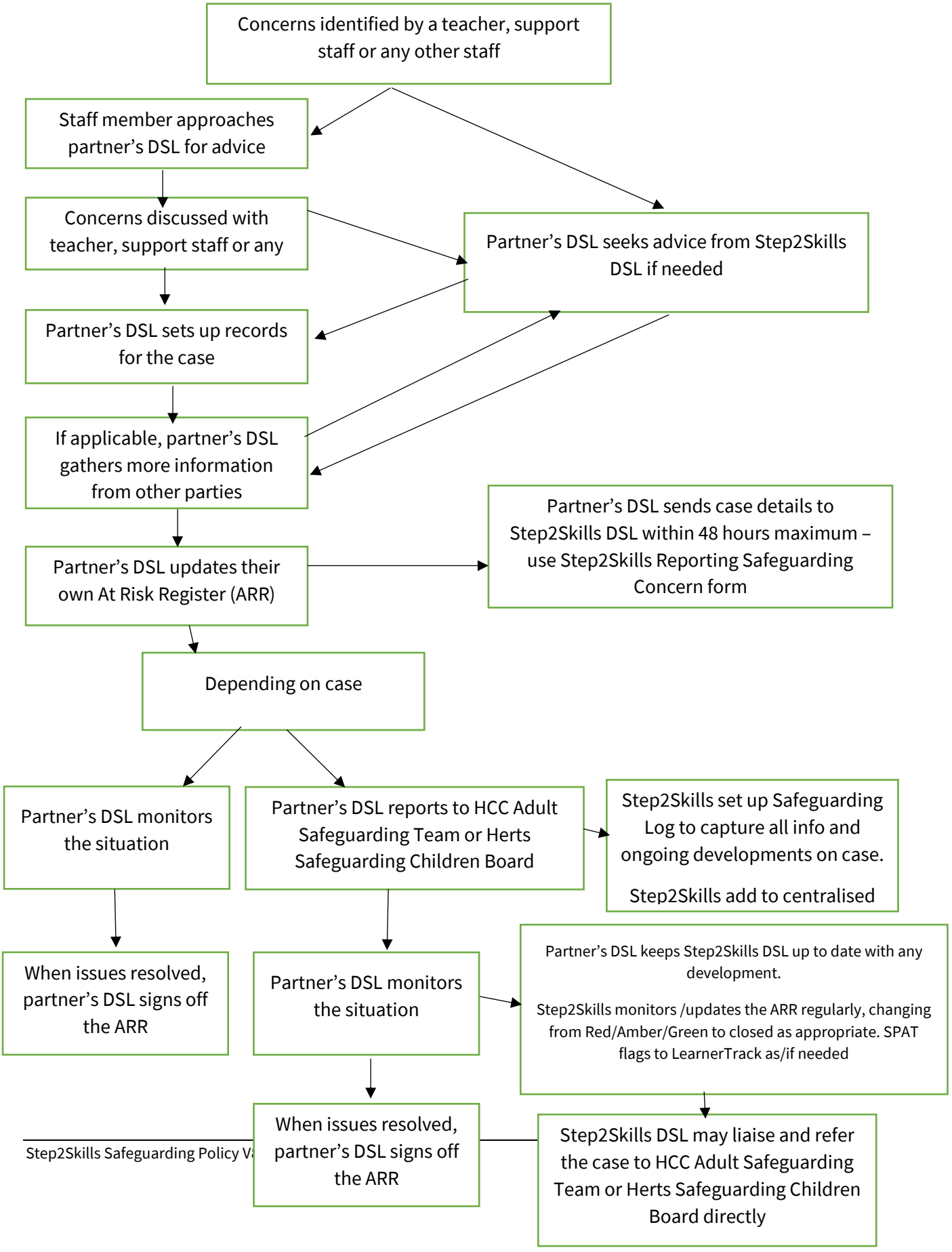
All parties will have a right to be represented and will be informed of the outcome of any decision made in light of the investigation within a given timescale.

Confidentiality and discretion will be observed during the investigation of a complaint.

At any time, you have the right to report the matter to the police if you so wish. Any subsequent police investigation will supersede all internal investigations which may be put on hold subject to the outcome of police enquiries.

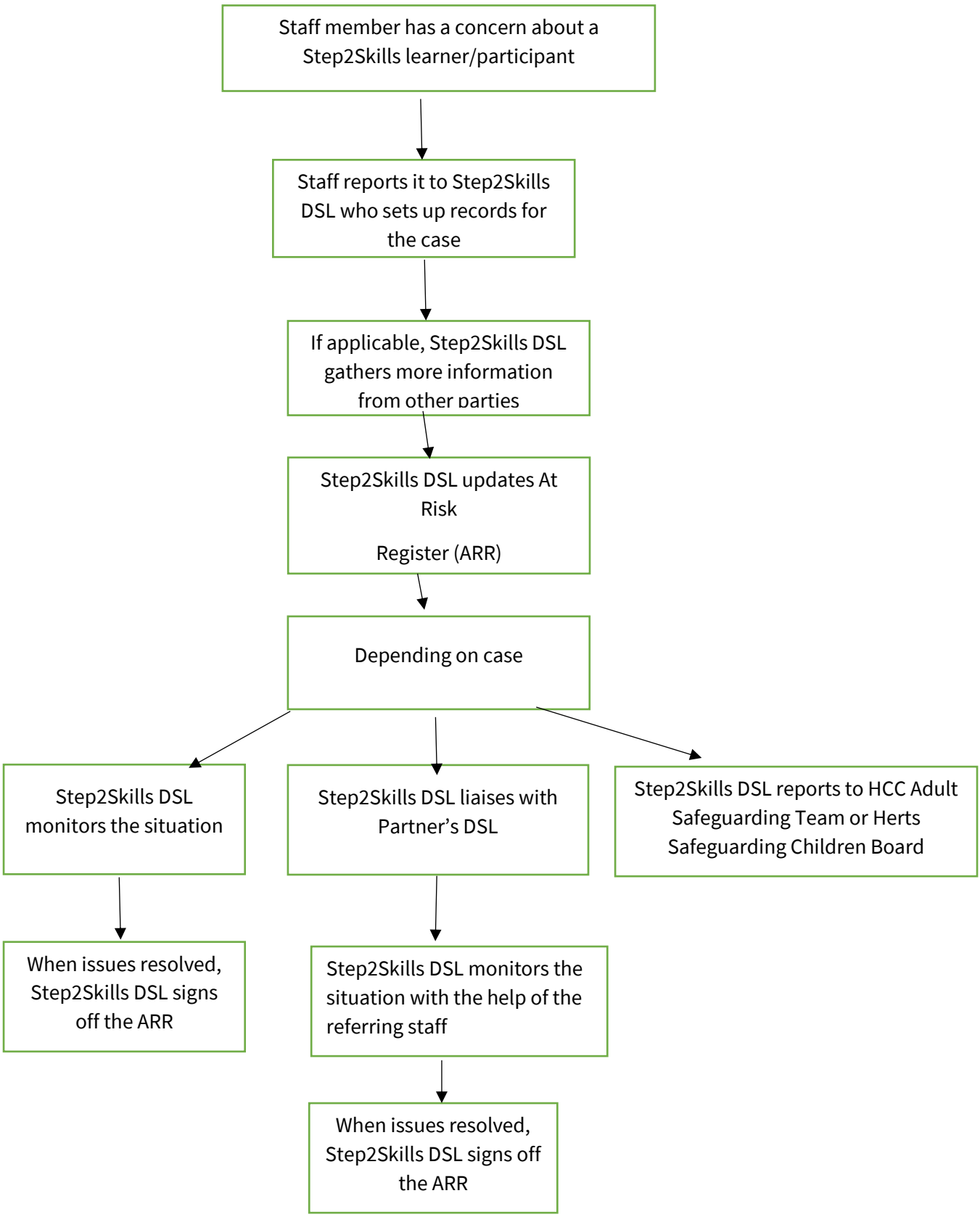
Appendix 2 - Procedure Flow Chart for dealing with incidents/concerns identified by

Step2Skills' Partners/Subcontractors



Appendix 3 - Procedure Flow Chart for dealing with incidents/concerns identified by

Step2Skills' Staff



Appendix 4 – Record of Concern Form

STEP 2 SKILLS
PREPARE FOR SUCCESS IN HERTS

Safeguarding Adults and Children

SAFEGUARDING / INCIDENT REPORT (Please complete this form each time you meet with the learner or take action related to this concern /incident and forward to Step2Skills.Safeguarding@hertfordshire.gov.uk

Date of incident	
Time of incident	
Name of learner/participant	
Partner name or S2S team (e.g. Herts Mind Network or Skills Team Health & Wellbeing)	
Learner/participant's ID number if known	
Learner/participant's DoB / age	
Learner/participant's Address	
Tutor/Mentor	
Parent/ Carer Name (if known/applicable)	
Parent/ Carer Contact Number (if applicable)	

Summary of Concern/Incident
Please state facts only

Please include:
Who is/ has been involved?

What happened?

Where did it take place?

How often/ How long ago?

Facts and any other relevant information

Please offer any other relevant information about what you have heard/ seen/ been told/ previous concerns

Any other services involved e.g. social services, mental health

Name	Telephone number	Email

Any action taken by you to include any referrals made and a name and contact number for any referrals

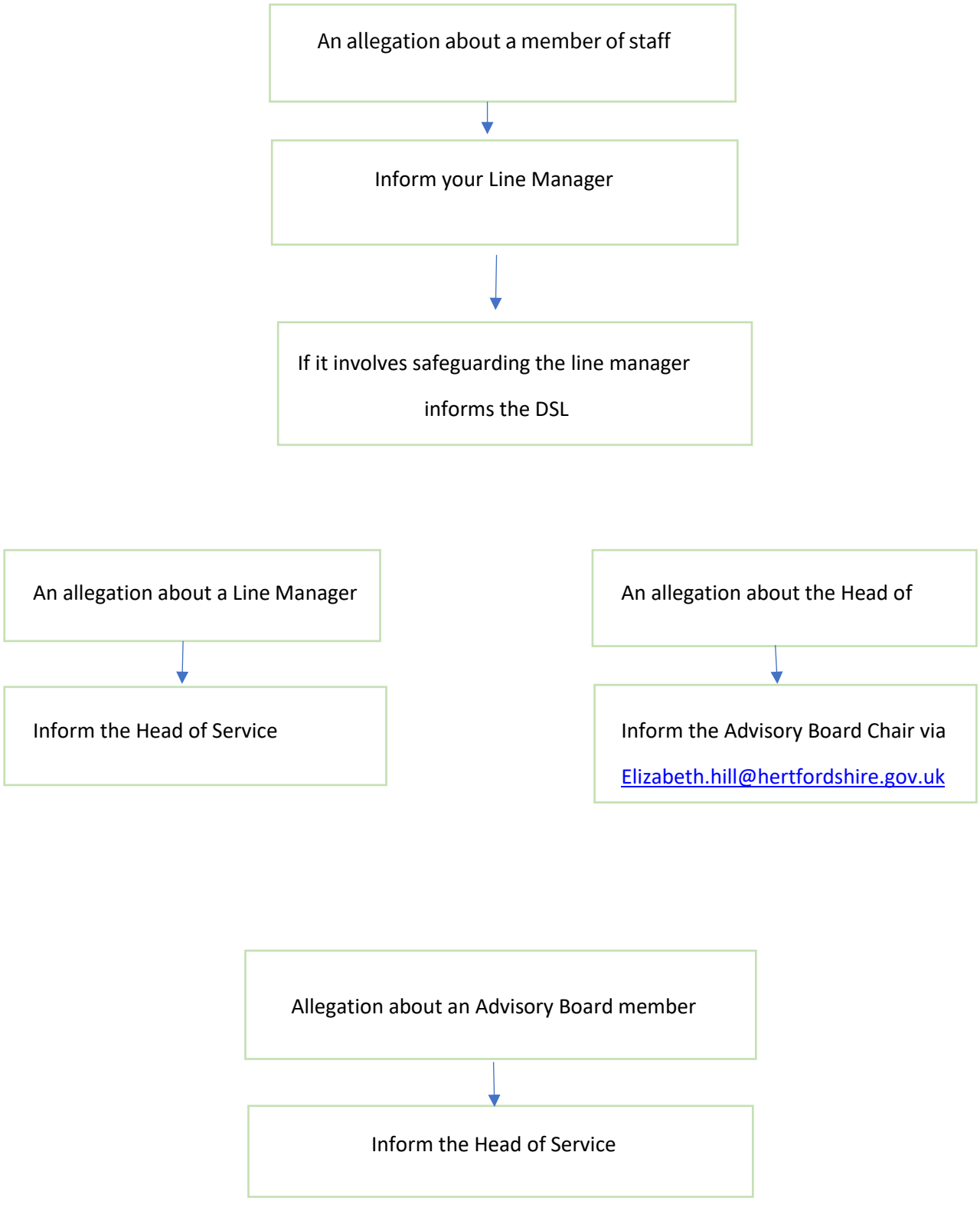
Reported by (Name & Job title): Signature (electronic if possible):
Contact Number:

Report Date:

To be filled in by the Step2Skills DSP

Step2Skills Designated Safeguarding Officer:	
Date and time initial referral received:	Initial referral to Safeguarding Officer (Name):
Referral received from:	
Method of referral (e.g. phone, email, face to face):	

Date:	**Safeguarding Officer:**
Action(s) taken:	

Date:	**Safeguarding Officer:**
Action(s) taken:	

Appendix 5 – Allegations Flow Chart