

# Step2Skills Safeguarding Policy

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## Contents

Introduction - What is Safeguarding? .....	2
1. Step2Skills' Ethos.....	3
2. Roles and Responsibilities.....	3
3. Trustees and Governors.....	5
4. Step2Skills' Safeguarding Team.....	6
5. Health and Safety.....	6
6. Anti - Bullying Statement .....	7
7. Anti - Discrimination Statement.....	9
8. E-Safety .....	9
9. PREVENT agenda .....	10
10. Safe Staffing .....	11
11. Staff Training.....	11
12. Governance .....	11
13. Policy Review .....	12
14. Appendices.....	13



## Introduction - What is Safeguarding?

Hertfordshire County Council's Step2Skills Service are committed to providing a safe learning environment for all its learners/participants and those accessing its services. Step2Skills aims to minimise the risk of all types of harm to all adults and children and will respond to any safeguarding concerns that are identified.

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.

In relation to adults, there is a different legislative and policy base for responding to their safeguarding needs. However, most of the principles and procedures that apply are the same as those for safeguarding children and young people.

Safeguarding action may be needed to protect all learners/participants regardless of age and their children if applicable from:

- physical abuse
- sexual abuse
- emotional abuse
- bullying, including online bullying and prejudice-based bullying
- harassment or discrimination or peer-on-peer abuse
- racist, disability and homophobic or transphobic abuse
- gender-based violence/violence against women and girls
- radicalisation and/or extremist behaviour
- the impact of new technologies on sexual behaviour, e.g. sexting
- substance misuse
- domestic violence
- female genital mutilation
- forced marriage
- grooming behaviour (for personal, sexual or financial gain)
- poor parenting, particularly in relation to babies and young children
- neglect
- child sexual exploitation and trafficking
- teenage relationship abuse
- issues that may be specific to a local area or population, for example gang activity and youth violence
- fabricated or induced illness
- other issues not listed here but that pose a risk to adults and their children including self-harming and suicidal behaviour.

Safeguarding is not just about protecting learners/participants from deliberate harm, neglect and failure to act. It relates to broader aspects of care and education, including:

- poor practice in the offer of care and support to learners/participants and children
- learners/participants' health and safety and well-being
- the use of reasonable force
- meeting the needs of learners/participants and children with medical conditions
- providing first aid or intimate care
- emotional well-being
- online safety and associated issues
- appropriate arrangements to ensure learners/participants' security, taking into account the local context.

## 1. Step2Skills' Ethos

Step2Skills will take appropriate action to ensure that procedures and policies reflect the expectations highlighted in the document *Inspecting safeguarding in early years, education and skills* issued in August 2021:

[Inspecting safeguarding in early years, education and skills - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/97222/inspecting_safeguarding_in_early_years_education_and_skills.pdf)

and the following [Keeping Children Safe in Education](#) September 2021.

Step2Skills will actively encourage its leaders, governors and managers to create a positive culture and ethos where safeguarding is an important part of everyday life in the setting, backed up by training at every level.

All staff members will be supported to have a good awareness of the signs that a learner or child is being neglected or abused. The following guidance will be used in addition to this policy to support staff in taking appropriate action – the same concepts apply to working with children and adults.

[What to do if you are worried a child is being abused](#)

Step2Skills will expect all partner/subcontractors to endorse a similar approach within their organisation.

## 2. Roles and Responsibilities

### **Step2Skills will:**

Work within guidance and procedures established by the [Hertfordshire Safeguarding Adults Board](#) and [Hertfordshire Safeguarding Children Partnership](#)

Annually review the Safeguarding Policy for the Service and guidance for external partner/subcontractors with regards to Step2Skills expectations.

Annually review the Learner Behaviour policy as guidance for partners/subcontractors. Ensure Step2Skills' learners/participants have a clear understanding of Step2Skills' expectations with regards to their behaviour.

Promote safeguarding throughout its recruitment process and ensure all required checks are completed prior to the appointment of any individual and that safeguarding is included during the induction of all new Step2Skills staff.

Support safeguarding training (initial training and refreshers) to Step2Skills staff and partner/subcontractors and monitor attendance on that training.

Identify a Step2Skills Designated Safeguarding Lead and a Deputy Designated Safeguarding Lead who will be trained appropriately to deal with matters related to adults and children at risk.

Respond to any safeguarding issues that are reported or identified in a timely fashion.

Minimise the occurrence of incidents through training on certain issues or forming partnerships with preventative organisations.

Ensure that Disclosure and Barring Service (DBS) Enhanced checks have been completed according to the Safe Staffing policy approved by HCC Safe Staffing team.

Issue Safeguarding leaflets and posters for learners/participants that partner/subcontractors can use (e.g. Be Safe leaflet).

Annually review the e-Safety policy which can be used as guidance to partner/subcontractors.

Include a section on Health and Safety and safeguarding in the Teacher Handbook, which covers emergency procedures and health and safety in the classroom.

Ensure that adequate Safeguarding policies and procedures are in place with all partner/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 partner/subcontractors.

Collate Incident information for all Step2Skills learners/participants and hold and monitor an At Risk Register.

**Partners/subcontractors will:**

Have an up-to-date Safeguarding 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.

Clearly communicate their behaviour expectations with their learners/participants.

Understand and apply expectations and principles of **Inspecting Safeguarding in Early Years, Education and Skills settings** and **Keeping Children Safe in Education**.

All partner/subcontractors should have an up-to-date Health and Safety policy and adequate Health and Safety procedures in place including incident logs.

Promote safeguarding throughout its recruitment process and ensure that adequate Disclosure Barring Service (DBS) checks have been completed on partner/subcontractors' staff members.

Hold a Single Central Record of DBS checks for their organisation and have adequate recording and monitoring practices of Safeguarding incidents/cases.

Ensure all staff involved with delivery of Step2Skills-funded courses undergo adequate safeguarding training and refreshers maximum every 3 years.

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.

The DSL and DDSL will have completed HCC's Designated Safeguarding Officer 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.

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.

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.

### **3. Trustees and Governors**

Leaders, trustees, governors and supervisory bodies (where appropriate) fulfill legislative requirements, such as those for disability, safeguarding, and health and safety. They need to regularly review policies and procedures.

Each organisation should nominate one trustee/governor with specific responsibility for Safeguarding matters.

Leaders, trustees and governors should attend appropriate training on Safeguarding matters that is updated every two to three years and they should be fully aware of their responsibilities with respect to the protection of adults, children and young people.

#### **4. Step2Skills' Safeguarding Team**

Step2Skills Designated Safeguarding Lead (DSL) for adults and children is **Chantal Lommel**, Head of Service, Step2Skills.

Step2Skills Deputy Designated Safeguarding Lead (DDSL) for adults and children is **Tracey Mortimore**, Step2Skills Pathways to Employment Manager and Quality Manager.

In the absence of both the DSL and DDSL, three additional Step2Skills staff will be fully trained in Safeguarding matters and can be contacted for advice and support:

- **Barbara McDonagh** Adult Curriculum Manager
- **Jo Beazley**, Project Manager
- **Dan Arnold**, Project Leader

Those five staff members make up Step2Skills Safeguarding Team and are responsible for supporting the implementation of this policy and for monitoring Safeguarding practices across Step2Skills -funded provision.

Step2Skills Designated and Deputy Designated Safeguarding Leads will be referring matters to HCC Children Services and to HCC Adult Safeguarding teams accordingly.

#### **5. 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.

Teachers can access more information on Health and Safety in the classroom through the Step2Skills Teacher handbook available on Google Classroom.

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 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

## **6. Anti – Bullying Statement**

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

All Step2Skills’ staff, partner/subcontractors’ staff and learners/participants should have an understanding of what bullying is.

### **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
- any language or gestures that incite hatred towards any individual or group of individuals.
- 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 Officer by using the standard Safeguarding Incident Report form.
- The partner/subcontractor's Designated Officer will then investigate the incident and take any appropriate action
- The partner/subcontractor's Designated Officer will report the incident and results of the investigation within 48 hours to the Step2Skills Safeguarding Team.

If the learner 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 are expected to complete an HCC e-learning module to understand their roles and responsibilities. Step2Skills also will 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.



## 7. Anti - Discrimination Statement

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

- To actively promote the principles and ideals of equality
- 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

For more information, please refer to the Step2Skills Equality Strategy.

## 8. E-Safety

All adults should be supported to understand the risks posed by using technology, including the internet. They need to be made aware of the risks of cyber-bullying, grooming, radicalisation or abuse of children or learners/participants.

Partner/subcontractors will have well-developed strategies in place to keep learners/participants and children safe. Partner/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 is available from Step2Skills and there are many useful resources on the internet to support adults with e-safety, including this one: <https://www.getsafeonline.org/>

Step2Skills and partner/subcontractors' leaders and managers will oversee the safe use of computers and mobile technology when learners/participants and children are in their care and take action immediately if they are concerned about their learners/participants' e-safety.

All classes must include guidance related to e-safety that is appropriate to the level and duration of the course. The e-safety component of the class must be explicitly stated on the lesson plan. Further guidance can be found here [Teaching Online Safety In Schools](#)

Key issues to consider with e-safety are as follows:

- Scams (419s, phishing or spoofing, lottery wins etc.)
- Inappropriate contacts
- Harassment and bullying
- Peer on peer abuse

- Masquerading and identity theft
- Inappropriate materials
- Sexting
- Inappropriate use of social media (e.g. Facebook, Twitter)
- Illegal acts by users (e.g. copyright breach)
- Malicious software (e.g. viruses and downloads)

Step2Skills has provided a proforma for an e-Safety policy including an acceptable use statement. All partner/subcontractors using ICT in classes must have this in place either using the Step2Skills proforma or their own. If partner/subcontractors use their own policy, it must meet the criteria set out in Step2Skills guidelines.

## **9. PREVENT agenda**

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.

The Channel project provides a mechanism for assessing and supporting people who may be targeted by violent extremists or drawn into violent extremism. It provides a multi-agency approach for identifying, assessing the nature and extent of risk and developing an appropriate support strategy for the individual concerned.

When a member of staff (Step2Skills or partner/subcontractor staff member) has any concerns that a student may be at risk of radicalisation or involvement in terrorism, they should speak with immediately with one of Step2Skills' Safeguarding Team.

Step2Skills' DSLs in relation to protecting individuals from radicalisation and involvement in terrorism are, Chantal Lommel, Step2Skills Head of Service, and Tracey Mortimore, Step2Skills Pathways to Employment Manager and Quality Manager. Chantal Lommel is the single point of contact (SPOC) for PREVENT within Step2Skills

When concerns are identified about an adult at risk who is believed to be vulnerable to radicalisation a safeguarding referral should be raised to the DSL via the Safeguarding Incident Form. The referral should be forwarded to the Hertfordshire Police Safeguarding Adults from Abuse team (SAFA) if appropriate. The referral may then be forwarded to the Channel co-ordinator and the Channel protocol will then be followed.

Step2Skills curriculum team leaders, subcontractors' managers and teachers will ensure that British Fundamental Values are embedded in staff training and learner curriculum, where relevant, to protect learners and participants from radicalisation

and extremist views. When delivering curriculum, teachers/mentors will consider how to equip learners and participants 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.

## **10. Safe Staffing**

Step2Skills will ensure that all partner/subcontractors have a Safe Staffing policy and a policy or procedure for lone working. Step2Skills can provide templates for this.

Step2Skills follows HCC safe staffing policies and lone working policies for their staff and these are included as agenda items in Team Meetings.

For further information, please refer to Step2Skills Safe Staffing policy.

## **11. Staff Training**

Every year all Step2Skills staff undertake safeguarding and PREVENT training, child protection in one year and safeguarding adults/PREVENT the next. All staff are required to attend this training at least every three years.

Refresher training will be undertaken as appropriate.

Step2Skills will also facilitate or signpost Adult and Child Safeguarding training for Step2Skills partner/subcontractors with the support of other HCC departments. All partner/subcontractors will ensure that all their staff members are adequately trained as per this policy.

## **12. Governance**

Step2Skills ensure that Step2Skills Advisory Board Members undertake adequate safeguarding and Prevent training every 3 years.

HCC Community and Specialist Services Assistant Director, who is responsible overall for Step2Skills as a service, is the Step2Skills Board member dedicated to Safeguarding.

Step2Skills Management team report formally once a year to the Board to highlight trends and concerns and seek formal endorsement of Step2Skills practices.

Step2Skills safeguarding team meet 4 - 5 times a year to share best practice and discuss further training and support that could be provided to the team and partner/subcontractors.

### **13. Policy Review**

Responsible: Step2Skills Head of Service

Next review date: January 2023

## 14. 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 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, or another member of staff.

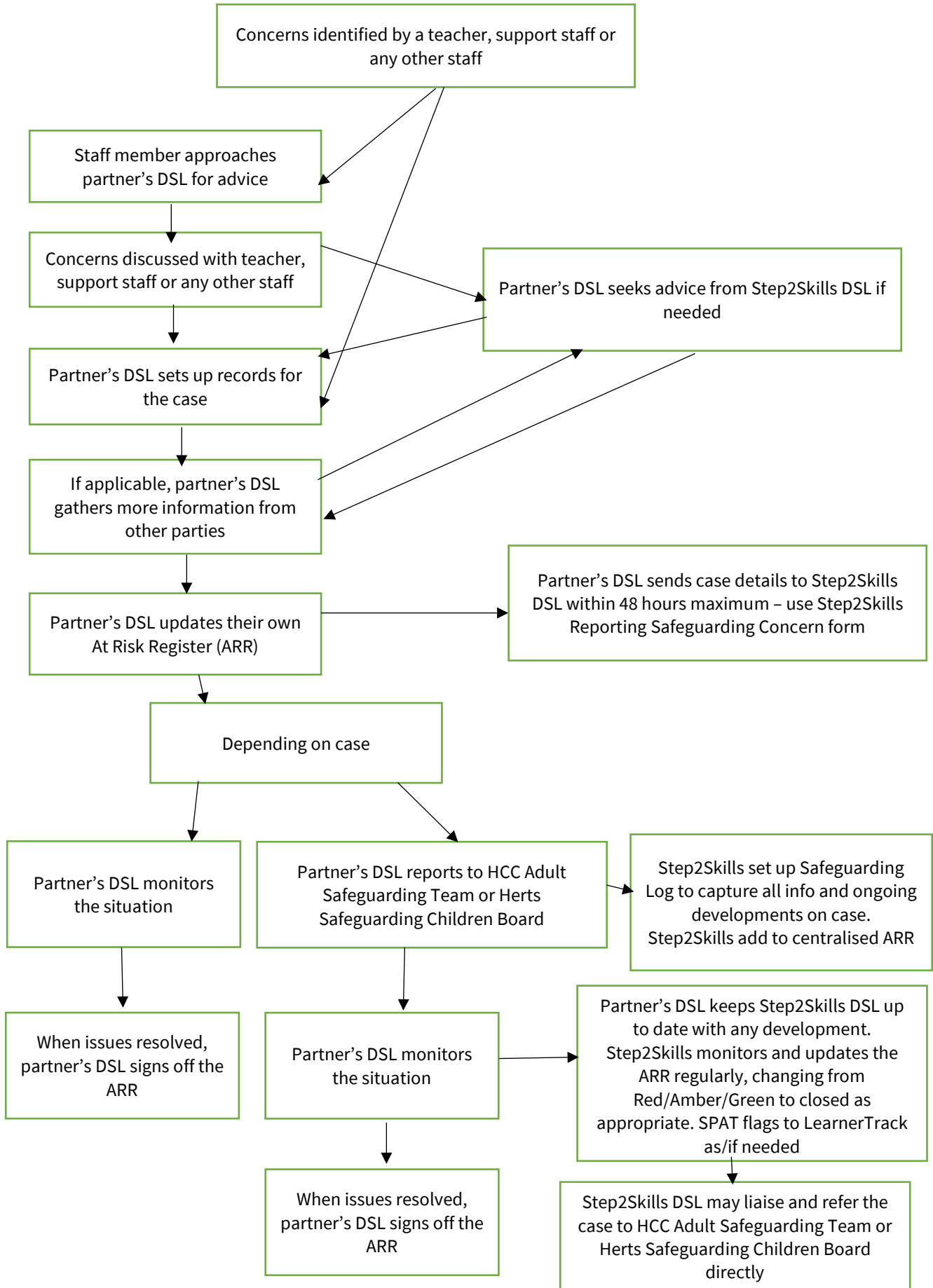
If unable to resolve the matter informally the person you spoke to will be able to give advice on what to do next. Your complaint will be processed through a formal procedure, which will include an investigation of all parties concerned. Any relevant evidence will be examined.

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' (previously HAFLS) Partners/Subcontractors**



**Appendix 3 - Procedure Flow Chart for dealing with incidents/concerns identified by Step2Skills' (previously HAFLS) Staff**

