

Safeguarding Policy



INTRODUCTION

Step Ahead is committed to ensuring the safety and wellbeing of all individuals we work with including young people aged 16 and above, young adults and adults including our own staff. This Safeguarding Policy outlines our approach to protecting these individuals from abuse, neglect and exploitation.

Our policy is to treat everyone equally and fairly, regardless of their gender, sex, sexual orientation, reassignment status, belief or religion, civil partnership, marital status, perceived age, age, colour, race, nationality, ethnic origins or disability. Furthermore, Step Ahead's responsibility is to ensure everyone's safety from any harm, be it physical, sexual, psychological, or emotional, financial, neglect or discriminatory abuse. Step Ahead is committed to following the guidance in The Making Safeguarding Personal Toolkit.

PURPOSE AND SCOPE

Step Ahead's safeguarding approach is underpinned by the following core principles:

- Safeguarding is everyone's responsibility.
- The welfare and wellbeing of young people, young adults, and adults at risk is paramount.
- All individuals have the right to be protected from abuse, harm, and neglect.
- Concerns will be taken seriously, recorded accurately, and acted upon without delay.
- A person-centred approach will be taken, ensuring individuals are listened to and involved in decisions affecting them where appropriate.

Step Ahead operates a zero-tolerance approach to abuse, exploitation, and safeguarding failures.

This policy applies to all individuals engaged by Step Ahead in any capacity, including employees, volunteers, contractors, partners, and offshore or remote staff, irrespective of geographic location, employment status, or working arrangement.

Definitions

Young people: Individuals aged 16 to 17

Young adults: Individuals aged 18 to 25

Adults: Individuals aged 26 and over

Safeguarding: Protecting individuals from abuse, harm and neglect

Abuse: The violation of a person's human and civil rights by any other person. It is where someone does something to another person, or to themselves, which puts them at risk of harm and impacts on their health and wellbeing.

| Type of Abuse: | Definition: |
|----------------|--|
| Discriminatory | Discrimination against someone's protected characteristic. |

Safeguarding Policy



| | |
|-----------------------------|---|
| Domestic | Violence or abuse by someone who is or has been an intimate partner or family member |
| Organisational | Neglect and poor care practice within organisations |
| Physical | Physical abuse, restraint, and misuse of medication |
| Psychological/ Emotional | Subjecting or exposing another person to a behavior that may result in psychological trauma |
| Sexual | Direct or indirect involvement in sexual activity without a person's consent |
| Financial | Defrauding, stealing or misusing someone's money or property |
| Neglect | Failure to respect an adult at risks's privacy, dignity, and individuality |
| Self-neglect | Neglecting one's personal hygiene, health or surroundings |
| Modern Slavery | Forced labour and exploitation |

SAFEGUARDING PROCEDURES

Recruitment and training

- Conduct background checks on all employees
- Provide safeguarding training during induction and provide regular updates
- Recognising abuse
- Staff should be aware of the signs of abuse which may include discriminatory, domestic, organisational, physical, psychological or emotional, sexual, financial, neglect, self-neglect and modern slavery

Reporting concerns

- Report any concerns to the DSL immediately
- Document all details of the concern accurately and securely
- The DSL will assess the concern and take appropriate action, which may include contacting local authorities or the police

Responding to a disclosure:

- Listen carefully and remain calm
- Reassure the individual they did the right thing by speaking up
- Do not promise confidentiality, explain the need to report the disclosure

In addition to general safeguarding procedures, the following specific measures apply to young people aged 16 to 17:

- Parental/ Guardian consent: Obtain consent from parents or guardians for activities involving young people
- Supervision: Ensure appropriate supervision for activities involving young people
- Age-appropriate communication: Use language and methods of communication suitable for young people

Safeguarding Policy

- Safe environment: Ensure all environments are safe and suitable for young people, conducting regular risk assessments

Safeguarding Step Ahead employees

All Step Ahead employees have the right to feel safe where they work. Other people should not hurt or abuse them, including colleagues.

The following are strictly prohibited:

- Befriending candidates or learners on a personal basis on social media sites
- Distributing telephone numbers
- Sarcasm, insults or belittling comments towards candidates or learners are not allowed in any way.
- Personal relationships with candidates or learners are not permitted in any way.

It is also essential to be mindful of:

- Locations of one-to-one meetings. Try to ensure they take place in a mutually agreed place at a neutral location.
- Maintain professional boundaries whenever carrying out work on Step Ahead's behalf. Uphold confidentiality in line with GDPR within certain remits when required by the situation but be careful not to promise to keep secrets or ask others to do so in line with the Safeguarding Policy.
- If at any point you feel unsafe in anyone's company, inform your line manager or the DSL.

Staff also undertake e-learning on their induction covering the following topics. A central log of completion and refresh dates is maintained on the HR system.

- Disability Awareness & Inclusion
- Environmental Awareness
- Equality Diversity & Inclusion
- GDPR UK: Essentials
- Health & Safety for Home Workers
- Modern Slavery
- Resilience

ROLES AND RESPONSIBILITIES

Management: Ensuring the implementation of this policy and providing necessary resources and training. Ensuring the Safeguarding Team store all documentation related to safeguarding concerns in the designated Safeguarding folder which guarantees strict access controls in accordance with current relevant legislation and guidance.

Designated Safeguarding Lead (DSL): Emily Bunu, emily@stepahead.co.uk Overseeing safeguarding practices, acting as the main contact for concerns, and liaising with external agencies. Planning and implementing training for all employees. Carrying out investigations appropriate to welfare concerns reported and liaising with external bodies such as the safeguarding board.

Safeguarding Policy

Deputy Designated Safeguarding Leads (DDSL): John Whitehouse, john@stepahead.co.uk and Joshua McIntosh, joshua@stepahead.co.uk Dealing with all the above in the absence of the DSL.

Staff: Following safeguarding procedures, reporting concerns, and participating in training.

Offshore staff and Remote Working Arrangements: Step Ahead may engage employees, contractors, or partners who are based outside the United Kingdom (“offshore staff”). All safeguarding principles outlined in this policy apply in full to offshore staff, regardless of location, jurisdiction, or employment model.

To ensure consistent safeguarding standards across all locations, the following applies:

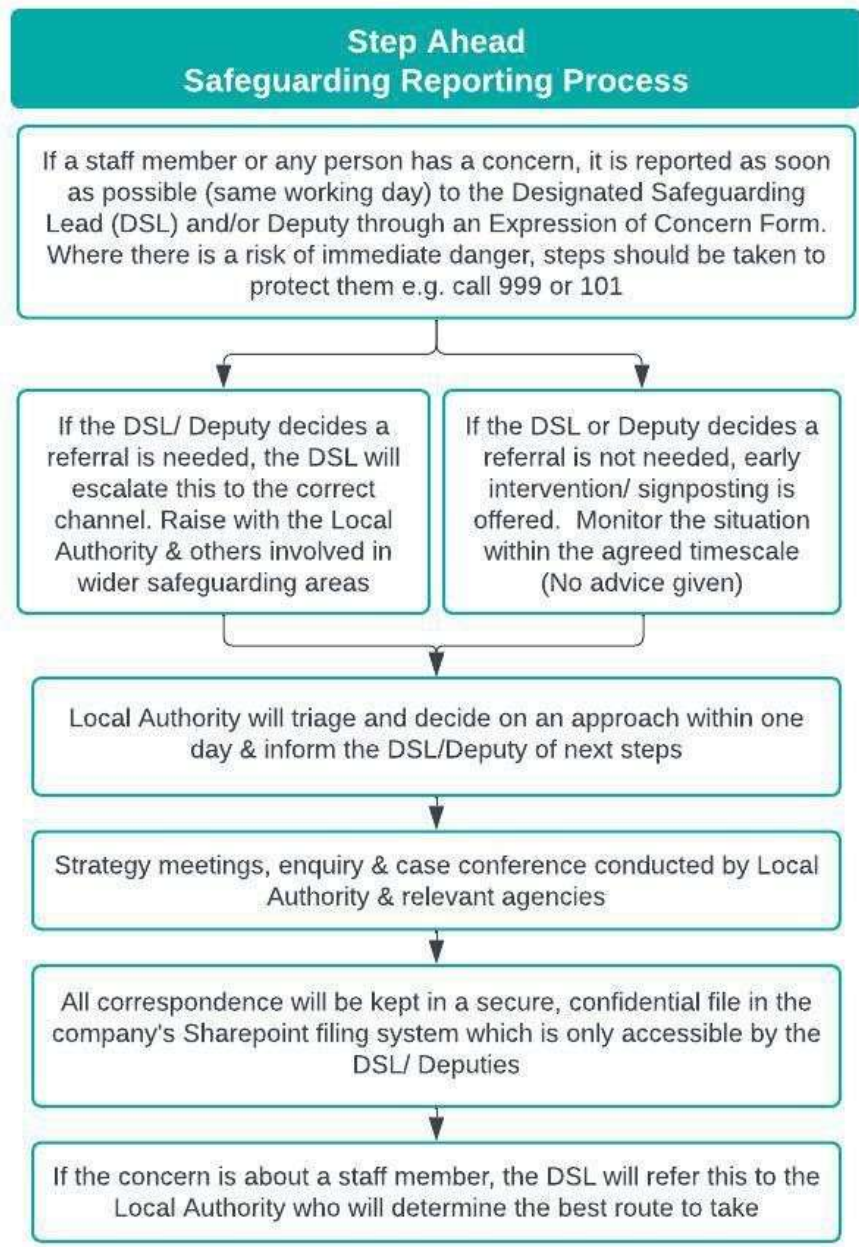
- Policy compliance: Offshore staff must comply with Step Ahead’s Safeguarding Policy, Code of Conduct, and all related procedures, regardless of local employment practices or legislation.
- Safeguarding training: All offshore staff must complete safeguarding training appropriate to their role during induction and undertake regular refresher training as required by Step Ahead.
- Reporting concerns: Offshore staff must report any safeguarding concerns immediately to the Designated Safeguarding Lead (DSL) or Deputy DSLs using agreed communication channels. Time zone differences do not delay the requirement to report concerns promptly.
- Jurisdictional considerations: Where local safeguarding laws or practices differ from UK requirements, Step Ahead’s safeguarding standards will remain the minimum expectation. Any conflicts must be escalated to the DSL for guidance.
- Confidentiality and data handling: Offshore staff must comply with UK GDPR and Step Ahead data protection requirements when handling safeguarding information.
- Safe working practices: Offshore staff are expected to maintain professional boundaries and follow the same standards regarding communication, conduct, and interaction with young people and adults at risk.

Step Ahead will ensure appropriate systems are in place to support secure communication, reporting, and record-keeping for offshore staff in line with safeguarding and data protection requirements.

RELATED POLICIES AND DOCUMENTS

- Equality, Diversity and Inclusion Policy
- Grievance Procedure
- Disciplinary Procedure
- Prevent Policy
- Modern Slavery Policy
- Anti-Fraud, Bribery and Corruption Policy
- Whistleblowing Policy
- Use of Emails, Internet and Voicemails

Safeguarding Policy



Safeguarding Policy



| Document Control | |
|-------------------------------------|-----------------------------------|
| Document Title: Safeguarding Policy | |
| Version Number: 2.2 | Document Owner: Corporate Support |
| Date Approved: 28 May 2025 | Approved By: Jackie Bedford, CEO |
| Effective Date: 28 May 2025 | |
| Superseded Version: 1 | |
| Date of Last Review: 20 April 2026 | Date of Next Review: 1 April 2026 |