

# Step Up Network

Supporting new and aspiring  
leaders in education.

## Safeguarding Policy

Policy Owner / Person Responsible	Founder & Chair / Executive Director Vice Chair Strategy & Impact
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## Background

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The Step Up Network we provide a range of services to different clientele. This includes our pastoral network where we support 11- 16 years olds.

We recognise the responsibility to promote safe practice and to protect Adults at Risk and adults at risk from harm, abuse, and exploitation. For the purposes of this policy and associated procedures an adult is someone over the age of 18 years.

- The Step Up Network will respond promptly and appropriately to all incidents or concerns regarding the safety of a member that may occur. The Step Up Network will not tolerate abuse and exploitation by volunteers or associated personnel.
- To provide volunteers, with overarching principles that guide our approach to adult protection.
- We will give equal priority to keeping all adults safe regardless of their age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation.

This applies to anyone who works on behalf of The Step Up Network, including senior managers & volunteers. They will work together to embrace difference and diversity and respect the rights of people. This policy is distributed to all volunteers.

This policy will address the following areas of safeguarding [as appropriate]: adult safeguarding, and protection from sexual exploitation and abuse. These key areas of safeguarding may have different policies and procedures associated with them (see Associated Policies).

The Step Up Network commits to addressing safeguarding throughout its work, through the three pillars of prevention, reporting, and response.

## Scope

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- All volunteers contracted by The Step Up Network.
- Associated personnel whilst engaged with work or visits related to The Step Up Network, including but not limited to the following: consultants; contractors; programme visitors including journalists, and politicians.

## Purpose

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The purpose of this policy is to protect people, particularly at-risk adults, and beneficiaries of assistance, from any harm that may be caused due to their encountering our services with The Step Up Network, and our networks.

This includes harm arising from:

- The conduct of volunteers or personnel associated with The Step Up Network.
- The design and implementation of The Step Up Network programmes and activities.

The policy lays out the commitments made by The Step Up Network and informs volunteers and associated personnel of their responsibilities in relation to safeguarding.

This policy does not cover:

- Safeguarding concerns in the wider community not perpetrated by The Step Up Network or associated personnel.

## Definitions

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For this policy, The Step Up Network defines safeguarding as protecting people's health, wellbeing, human rights and enabling them to live free from harm, abuse, and neglect.

In our sector, we understand it to mean protecting people, including children and at-risk adults, from harm that arises from encountering our volunteers or programs.

This policy has been written based on current legislation, policy and guidance that seeks to protect children in England. A summary of the key legislation and guidance is available on GOV.UK.

### Government Guidance & Legislation

- Care and support statutory guidance (2022) [Care and support statutory guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/care-and-support-statutory-guidance)
- Equality Act (2010) <https://www.gov.uk/guidance/equality-act-2010-guidance#:~:text=The%20Equality%20Act%202010%20legally,strengthening%20protecti on%20in%20some%20situations>
- Information sharing: A guide for practitioners (2018) [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1062969/Information sharing advice practitioners safeguarding service s.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1062969/Information_sharing_advice_practitioners_safeguarding_service_s.pdf)
- Safeguarding Vulnerable Groups Act (2006) [Safeguarding Vulnerable Groups Act 2006 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2006/16/contents/enacted)
- The Data Protection (2018) <https://www.legislation.gov.uk/ukpga/2018/12/contents/enacted>
- Working together to safeguard children (2018) <https://www.gov.uk/government/publications/working-together-to-safeguard-children-2>

For this policy, we determine that a risk, is an incident serious in the actions of a person but can be responded to and managed much quicker, with a lower impact. *The casual factors of any such harm, and or abuse can also be wide ranging. For example, adults are at risk by family members or members of the community.* This could include:

- Abuse
- Bullying or cyberbullying
- Cybercrime
- Child criminal/sexual exploitation
- County lines
- Domestic Violence
- Exposure or infliction of domestic abuse
- Female genital Mutilation
- Honour based violence.
- Modern Slavery and National referral mechanism
- Neglect

- *Physical and emotional abuse.*
- *Peer on peer abuse.*
- *Radicalisation/extremism/terrorism*
- *Sexual abuse*
- *Upskirting.*

Whilst the list above is broad, it would be the responsibility of our executive team to use their knowledge and judgement to determine the type of incident. It is also possible for an incident to be initially deemed as a Significant Incident before determining this as a crisis/major incident.

See appendix A for a glossary of terms.

***We believe that no one should never experience abuse of any kind.***

***We recognise that:***

- The welfare of volunteers is paramount in all the work we do and in all the decisions we take.
- Working in partnership with volunteers and other agencies is essential in promoting people's welfare.
- All volunteers, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation have an equal right to protection from all types of harm or abuse.
- Some volunteers are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues. Extra safeguards may be appropriate to those who are additionally vulnerable safe from abuse.

## Bullying & Harassment

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The Step Up Network believes strongly that no volunteer should be volunteering within an environment where bullying and harassment is tolerated. Should you wish to report a concern this should be reported to your line manager or the people team in the first instance. If upon investigation, any incidents of bullying or harassment are founded or if a malicious allegation is made, the volunteer will have their volunteering terminated with The Step Up Network.

### Roles and Responsibilities

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The Vice Chair of Impact & Strategy and Policy & Compliance Lead have ultimate responsibility for this policy. It is also in the interest of the People & Volunteering Lead, who oversee the wellbeing of volunteers. They will review this policy annually in consultation with the Policy & Compliance Lead and the Chair.

- Ensure all volunteers have access to, are familiar with, and know their responsibilities within this policy.
- Design and undertake all its programs and activities in a way that protects people from any risk of harm that may arise from their encountering The Step Up Network. This includes the way in which information about individuals in our programmes is gathered and communicated.
- Implement stringent safeguarding procedures when recruiting, managing, and deploying volunteers and associated personnel.
- Ensure volunteers receive training on safeguarding at a level commensurate with their role in the organisation.
- Follow up on reports of safeguarding concerns promptly and according to due process.

*Please also refer to the crisis & significant incident policy.*

### The Step Up Network, will seek to keep volunteers safe by:

- Promoting the health and welfare of volunteers by providing opportunities for them to take part in business safely.
- Respect and promote the rights, wishes and feelings of volunteers.
- Appoint a nominates DSL for volunteers, and a deputy.
- Promote and implement appropriate procedures to safeguard the wellbeing of volunteers and protect them from abuse.
- Recruit, train, support and supervise its volunteers to adopt best practice to safeguard and protect Adults at Risk/volunteers from abuse and to reduce risk to themselves.
- Develop and implement an effective online safety policy and related procedures.
- Require volunteers and members, to adopt and abide by best practice through our policies, procedures, and code of conduct.
- Respond to any allegations of misconduct or abuse of volunteers in line with this Policy and these procedures as well as implementing, where appropriate, the relevant disciplinary and appeals procedures.
- Regularly monitor and evaluate the implementation of this Policy and these procedures.
- Sharing information about safeguarding and good practice with volunteers via leaflets, posters, group work and one-to-one discussions.
- Making sure that volunteers know where to go for help if they have a concern using our safeguarding and related procedures to share concerns and relevant information with agencies who need to know.
- Use our procedures to manage any allegations against volunteers appropriately.

- Create and maintain an anti-bullying environment and ensuring that we have a policy and procedure to help us deal effectively with any bullying that does arise.
- Ensure that we have effective complaints and whistleblowing measures in place.
- Ensure that we provide a safe physical environment for volunteers, by applying health and safety measures in accordance with the law and regulatory guidance.
- Building a safeguarding culture where volunteers, treat each other with respect and are comfortable about sharing concerns.

### *Child safeguarding*

The Step Up Network and volunteers and associated personnel must not:

- Engage in sexual activity with anyone under the age of 18.
- Sexually abuse or exploit children.
- Subject a child to physical, emotional, or psychological abuse, or neglect.
- Engage in any commercially exploitative activities with children including child labour or trafficking.

### *Adult safeguarding*

The Step Up Network and volunteers and associated personnel must not:

- Sexually abuse or exploit at adults at risk.
- Subject an at-risk adult to physical, emotional, or psychological abuse, or neglect.

### *Protection from sexual exploitation and abuse*

The Step Up Network and volunteers and associated personnel must not:

- Exchange money, employment, goods, or services for sexual activity. This includes any exchange of assistance that is due to beneficiaries of assistance.
- Engage in any sexual relationships with beneficiaries of assistance since they are based on inherently unequal power dynamics.

Additionally, The Step Up Network and volunteers and associated personnel are obliged to:

- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Safeguarding Policy.
- Report any concerns or suspicions regarding safeguarding violations by an The Step Up Network and volunteer or associated personnel to the appropriate volunteer.



## Prevention

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The Step Up Network has put and will continue to put reasonable controls in place to ensure the prevention of such incidents. These are detailed in risk assessments which are produced for each event we run, particularly face-to-face events.

We have appointed a Policy and Compliance Manager to report into the Finance and Compliance function to manage such risks. We will appoint further volunteers to ensure that as we grow, that we ensure the safeguarding, safety, wellbeing, and continuity of The Step Up Network and the networks that we serve.

The Step Up Network promotes awareness of abuse and the risk of radicalisation through its volunteer training. The network ensures that:

- The designated DSL has relevant experience and receives appropriate training in safeguarding and the Prevent Duty and is aware of the Channel Programme and how to access it.
- Designated person training is refreshed every two years.
- Safe recruitment practices are followed for all new volunteers.
- All volunteers have a copy of this **Safeguarding policy**, understand its contents and are vigilant to signs of abuse, neglect, or radicalisation.
- All volunteers are aware of their statutory duties regarding the disclosure or discovery of abuse, and concerns about radicalisation.
- All volunteers receive basic safeguarding training, and safeguarding is a permanent agenda item at all meetings.
- All volunteers receive basic training in the Prevent Duty.

### Safer recruitment

The Step Up Network ensures safer recruitment through the following processes:

- Enhanced DBS checks
- Two references

### Disclosure and Barring Service Gap Management

The organisation commits resources to providing Disclosure and barring service checks on staff (paid or unpaid) whose roles involve contact with children and /or adults at risk.

To avoid DBS gaps, the organisation will ascertain who has a DBS in place, collate the numbers and check status. In addition to checks on recruitment for roles involving contact with children/ adults at risk, for established staff the following processes are in place we will review on a regular basis (at least every 3 years).

## Professional Boundaries

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Professional boundaries are what define the limits of a relationship between a support worker and a client. They are a set of standards we agree to uphold that allows this necessary and often close relationship to exist while ensuring the correct detachment is kept in place.

The Step Up Networks expects staff to protect the professional integrity of themselves and the organisation.

If the professional boundaries and/or policies are breached this could result in disciplinary procedures or enactment of the allegation management procedures.

## Communications, training and support for staff

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Step Up Network commits resources for induction, training of staff (paid and unpaid), effective communications and support mechanisms in relation to Safeguarding

### Training

All staff who, through their role, are in contact with children and /or adults at risk will have access to safeguarding training at an appropriate level.

Communications and discussion of safeguarding issues. Commitment to the following communication methods will ensure effective communication of safeguarding issues and practice:

### Support

We recognise that involvement in situations where there is risk or actual harm can be stressful for volunteers concerned.

The mechanisms in place to support staff include speak to team leader or vice chair.

### Allegation Management

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The Step Up Networks recognises its duty to report concerns or allegations against its team members within the organisation or by a professional from another organisation.

The process for raising and dealing with allegations is as follows:

- Report and log the concern
- Fact find incident
- Report to appropriate school is required
- Report to local authority if required

The Step Up Networks recognises its legal duty to report any concerns about unsafe practice by any of its paid or unpaid staff to the Independent Safeguarding Authority (ISA), according to the ISA referral guidance document.

### Response & Logging concerns

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#### Logging a concern

All information about the suspected abuse or disclosure, or concern about radicalisation, will be logged on the **notice of concern** form as soon as possible after the event. The record should include:

- Date of the disclosure, or the incident, or the observation causing concern.
- Date and time at which the record was complete.
- Name and date of birth of the individual involved.
- A factual report of what happened. If recording a disclosure, you must use the individual's own words.
- Name, signature, and job title of the person making the record.

Where an adult is at immediate risk of serious harm any adult present should call 999.

The Step Up Network will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to volunteers and the communities we work with.

Any volunteers reporting concerns or complaints through formal whistleblowing channels (or if they request it) will be protected by The Step Up Network and Whistleblowing Policy.

The Step Up Network will also accept complaints from external sources such as members of the public, partners, and official bodies.

Volunteer's members who have a complaint or concern relating to safeguarding should report it immediately to a member of the safeguarding team or line manager. If the volunteer member does not feel comfortable reporting to their Safeguarding Focal Point or line manager (for example if they feel that the report will not be taken seriously, or if that person is implicated in the concern) they may report to any other appropriate volunteer member. For example, this could be a senior manager or a member of the people Team.

## Response

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The Step Up Network will follow up safeguarding reports and concerns according to policy and procedure, and legal and statutory obligations (see Procedures for reporting and response to safeguarding concerns in Associated Policies).

The Step Up Network, will apply appropriate disciplinary measures to volunteers found in breach of policy.

The Step Up Network will offer support to survivors of harm caused by volunteers or associated personnel, regardless of whether a formal internal response is carried out (such as an internal investigation). Decisions regarding support will be led by the survivor.

In the event of a crisis or significant incident we will take the following steps:

- Crisis or Significant Incident alerted to the network's DSL/DDSL or The Step Up Network Impact & Strategy Support Team. During an event (particularly at the start of an event, key volunteers will wear clothing or labels that will clearly identify them).
- At event there will be key team members to meet at Registration / Meeting/ Information Point to assess the crisis, its potential severity and how it will impact the audience present. Alert the gold, silver, and bronze commanders to establish the incident management team. Should this be a disclosure/observation where safeguarding is concerned you should alert your line manager and complete a notice of concern form.
- Decide on a set of actions to take and who will take responsibility for each action.
- Key decisions and actions to be escalated to Brooke Waldron, Chief Operating Officer, or Ben Hobbis Chief Executive Officer.
- Allocate responsibility for actions.
- Communicate with stakeholders/networks (as necessary) about the incident.
- Monitor the incident and regularly re-evaluate the impact of the incident and any further actions required.

- Reflect on lessons learned and implement changes to organisational policies and practices as necessary once the incident has been resolved.

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Note: Ben/Brooke have overall responsibility for safeguarding for all stakeholders.

*Please be aware that our organisation and networks is ran completely by volunteers, therefore we may not get back to you straight away.*

### Contact numbers

Police: 101 (non-emergency) or 999 (emergency)  
Anti-terrorist hotline: 0800 789 321  
NSPCC: 0808 800 500

**It is essential that confidentiality is maintained at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management should be shared on a need-to-know basis only and should be always kept secure.**

## Supporting Documents

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This policy statement should be read alongside our organisational policies, procedures, guidance, and other related documents:

- Anti-bullying and harassment policy
- Acceptable use policy
- Code of conduct for volunteers
- Have your Say Policy
- Crisis & Significant incident policy.
- Data Protection Policy
- Health and Safety
- Induction, training, supervision, and support (See induction slide deck)
- Managing allegations against volunteers
- Role description for the designated safeguarding officer
- Safer recruitment
- Volunteer recruitment policy
- Whistleblowing

## Appendix A: Glossary of terms

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**Adult:** A person over the age of 18. We recognise those with SEND/Additional needs need ongoing support and are more at risk.

**Abuse:** A form of maltreatment of a person.

*Somebody (parent/carer/child/family/community setting) may cause abuse or neglect by inflicting harm or failing to prevent the person from harm.*

**Bullying or cyberbullying.**

*Exposure to other inappropriate content or behaviour, such as violence or criminal behaviour.*

**Child:** A human under the age of 18.

**Criminal exploitation (CCE) & Sexual exploitation (CSE):** We know that different forms of harm often overlap, and that perpetrators may subject anyone to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

*In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts, or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.*

**Cybercrime:** Criminal activity committed using computers and/ or the internet.

**County Lines:** Gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of deadline.

*CYP are exploited to move, sell, and store drugs and money.*

**Domestic abuse:** Victims if they see, hear, or experience the effects of abuse.

*People can witness and be adversely affected by domestic abuse in the context of their home life where it occurs between family members.*

**Emotional abuse:** The persistent emotional maltreatment such as to cause severe and adverse effects in the child's/adults' emotional development.

*Conveying the person is worthless/unloved or inadequate.*

**Female genital Mutilation:** Compromises all procedures involving partial or total removal of the external female genitalia. It is illegal in the UK and all volunteers have a duty of care to report this to the police immediately.

**Modern slavery and National referral mechanism:** Encompasses human trafficking and slavery, servitude and forced or compulsory labour.

*It can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.*

**Neglect:** The persistent failure to meet a person's basic physical and/or psychological needs, likely to result in the serious impairment of a child's health or development. It can also end up in adults being caused significant physical harm.

**Physical abuse:** A form of abuse that may involve; hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating, or otherwise causing physical harm.

**Peer on peer abuse:** Adults can abuse other adults (often referred to as peer-on-peer abuse) and it can take many forms. It can happen both inside and outside and online.

**Radicalisation:** Children are vulnerable to extremist ideology and radicalisation. Anyone in our organisation or associated personnel could be more susceptible to this due to the nature of our work online.

*Background factors combined with specific influences such as family and friends may contribute to a person's vulnerability.*

**Racism:** Prejudice, discrimination, or antagonism by an individual, community, or institution against a person or people based on their membership of a particular racial or ethnic group, typically one that is a minority or marginalized.

**Sexual abuse:** Involves enforcing a person to take part in sexual activities, not necessarily involving violence.

*It may involve physical contact, including assault by penetration or non-penetrative.*

*It may also include non-contact activities such as looking at, the production of sexual images, watching sexual activities, encouraging people to behave in sexually inappropriate ways, or grooming a person in penetration for abuse.*

*It can take place online and technology can be used to facilitate offline abuse.*

**Upskirting:** Where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress, or alarm. It is a criminal offence. Anyone of any sex, can be a victim.

**Vulnerable Child:** A child who is unable to protect him or herself. This includes a child who is dependent on others for sustenance and protection.

*A "vulnerable child" is defenceless, exposed to behaviours, conditions, or circumstances that he or she is powerless to manage, and is susceptible and accessible to a threatening parent or caregiver. Vulnerability is judged according to physical and emotional development, ability to communicate needs, mobility, size, and dependence.*

**Adults at Risk:** An individual age 18 or older who has the functional, mental, or physical inability to care for themselves. It can also refer to one who is unable to protect themselves against significant harm or exploitation.



## Appendix B: Safeguarding poster

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**Safeguarding and Welfare of Volunteers,  
Event Speakers and Attendees is our upmost  
priority. If you are concerned, please contact:**



**Brooke Waldron**  
Lead Designated  
Safeguarding Lead (DSL)  
Vice Chair Strategy & Impact



**Ben Hobbis**  
Deputy Designated  
Safeguarding Lead  
Founder, Chair  
& Executive Director



**Adam Brett-Aguirre**  
Deputy Designated  
Safeguarding Lead  
Podcast Lead Producer



**Christine Ivory**  
Deputy Designated  
Safeguarding Lead  
Vice Chair - Content



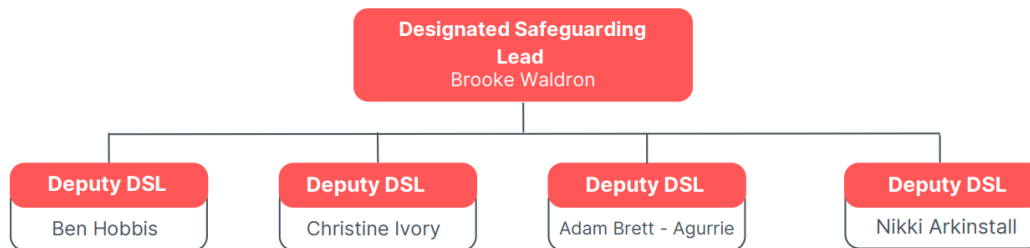
**Nikki Arkinstall**  
Deputy Designated  
Safeguarding Lead  
Social Media Lead

**Initial Safeguarding Concerns: [safeguarding@ecnetgroup.onmicrosoft.com](mailto:safeguarding@ecnetgroup.onmicrosoft.com)**

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## Appendix C: Flow Chart

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## Appendix D: Notice of concern form

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Please use this link when logging concerns.

<https://forms.office.com/e/wHTx8hXngG>