

Safeguarding, Child Protection and Prevent Policy 2026-27

Document control

This is Version 5.1 of the policy. It replaces Version 5.0 (October 2026) and reflects Keeping Children Safe in Education (KCSIE) 2026, in force from 1 September 2026, the Prevent duty guidance for England and Wales, the Home Office's refreshed Prevent thresholds guidance (Notice, Check, Share), and the Department for Education's 2026 practical Prevent guidance for designated safeguarding leads.

Version	Date	Author	Authorised by	Next review
5.1	21 October 2026	Zak Vesamia (DSL)	Ahmed Khan, Managing Director; Board of Governors (proposed 24 November 2026)	21 October 2027
5.0	October 2026	Zak Vesamia (DSL)	Not approved; superseded by 5.1	—
4.2 (update)	3 March 2025	Zak Vesamia	Board of Governors	September 2025
4.2	13 March 2024	Vanessa Pinzon	Board of Governors	30 October 2024
4.1	12 October 2023	Oksana Anikiejeva	Board of Governors	10 October 2023
3.0	1 September 2022	Oksana Anikiejeva	Board of Governors	31 August 2023
2.1	1 September 2021	Oksana Anikiejeva	Board of Governors	31 August 2022

The policy is reviewed every year, and sooner if legislation, statutory guidance or local arrangements change, if safeguarding roles change, or after a serious safeguarding incident. It is published on NST's website and given to every apprentice, employer and member of staff.

Next review date: 21/10/2027

Approval: This policy has been reviewed and approved by the following individuals:

Name: AHMED KHAN

Title: Managing Director

Signature: *A Khan*

Date: 21/10/2026

1. Policy overview

NextStep Training Limited (NST) puts the welfare of children, young people and adults at risk first in everything it does. Safeguarding is everyone's responsibility at NST, on and off site, in person and online.

Purpose and scope

This policy applies to all staff, governors, contractors, volunteers and visitors, and covers every apprentice and learner, wherever they train: at our Hackney office, at their workplace or online. It should be read alongside the Child and Vulnerable Adult Protection Policy and Procedures, the Prevent Risk Assessment and Action Plan 2026-27, the Safer Recruitment Policy, the Data Protection Policy and the Internet, Email and Social Media Policy.

As a DfE-funded apprenticeship provider, NST applies KCSIE 2026 as the standard for its provision. KCSIE 2026 came into force on 1 September 2026 and replaces the 2025 edition. Because most NST apprentices are adults working in early years, adult care and other workplaces, this policy also sets out how NST protects apprentices aged 18 and over, and how it works with employers.

NST will:

- make this policy available to apprentices, parents and carers, employers and staff, and publish it on our website
- explain it to every apprentice and employee at induction, including a specific safeguarding and Prevent session for every apprentice
- have the Designated Safeguarding Lead (DSL) monitor how it works in practice, and use that monitoring to update it
- promote a safe environment inside NST and in apprentices' workplaces
- promote an inclusive, anti-discriminatory culture, and recognise and challenge racist, misogynistic and discriminatory behaviour as a safeguarding matter

Key definitions

Term	Meaning in this policy
Safeguarding and promoting the welfare of children	Providing help and support to meet children's needs as soon as problems emerge; protecting children from maltreatment inside and outside the home, including online; preventing impairment of health and development; making sure children grow up with safe and effective care; and acting so all children achieve the best outcomes (as defined in Working Together to Safeguard Children).
Abuse, neglect and exploitation	The forms of harm set out in KCSIE Part one and Annex A, including physical, emotional (including verbal abuse such as persistent criticism), sexual abuse, neglect, child criminal exploitation and child sexual exploitation.
Child / young person	Anyone under 18. most of NST apprentices are adults.
Adult at risk	Someone aged 18 or over who has care and support needs and, because of them, cannot protect themselves from abuse, neglect or exploitation.
Peer-on-peer abuse	Abuse of one apprentice or learner by another, of any age. Where both are under 18, KCSIE calls this child-on-child abuse (Section 9).

Term	Meaning in this policy
Sexual violence and sexual harassment	As defined in Section 9, following KCSIE Part five and the Equality Act 2010.
Staff	Anyone employed, commissioned or contracted by NST, including volunteers, paid or unpaid.
DSL	The senior member of staff with lead responsibility for safeguarding and child protection, including online safety, filtering and monitoring, and Prevent.
Prevent Lead	The member of the safeguarding team who leads NST's Prevent training, risk assessment and partnership work, supporting the DSL.
Family Help	The local authority's early help and targeted family support, which replaces separate early help and "child in need" pathways under Working Together 2026.
External agencies	Children's social care (Hackney MASH, or the local authority where the learner lives), adult social care, the LADO, the police, Prevent and Channel, health services and the City and Hackney Safeguarding Children Partnership.

Legislation and statutory guidance

This policy follows:

- Children Act 1989 and Children Act 2004
- Education Act 2002 (section 175)
- Children and Families Act 2014
- Children's Wellbeing and Schools Act 2026
- Crime and Policing Act 2026, including the mandatory duty to report child sexual abuse and new child criminal exploitation offences
- Safeguarding Vulnerable Groups Act 2006 and Protection of Freedoms Act 2012
- Sexual Offences Act 2003 and Protection of Children Act 1978
- Female Genital Mutilation Act 2003 (including the mandatory reporting duty)
- Counter-Terrorism and Security Act 2015 (Prevent duty)
- Modern Slavery Act 2015
- Domestic Abuse Act 2021
- Online Safety Act 2023
- Equality Act 2010, including the duty on employers to prevent sexual harassment of employees added by the Worker Protection (Amendment of Equality Act 2010) Act 2023
- Employment Rights Act 2025, which makes sexual harassment a protected whistleblowing disclosure (from 6 April 2026) and strengthens the duty to "all reasonable steps", including harassment by third parties (expected from 30 October 2026)
- Care Act 2014 (adults at risk)
- UK GDPR and Data Protection Act 2018, as amended by the Data (Use and Access) Act 2025
- Public Interest Disclosure Act 1998
- Keeping Children Safe in Education 2026

- Working Together to Safeguard Children 2026
- Prevent duty guidance for England and Wales (2023, in force from 31 December 2023)
- Home Office Notice, Check, Share guidance on Prevent thresholds
- DfE: The Prevent duty: safeguarding learners susceptible to radicalisation (practical guidance for DSLs, Channel meetings guidance and next-step checklists, September 2026, updated 2 October 2026)
- DfE: Guidance for further education providers on work-based learners and the Prevent statutory duty
- DfE guidance: Generative AI in education; Information sharing advice for safeguarding practitioners

Supporting apprentices to stay safe

NST helps staff and apprentices to stay:

- **healthy** — wellbeing, mental health, nutrition and activity
- **safe** — health and safety, critical incidents, and the government's Run, Hide, Tell guidance
- **safe online** — including cyberbullying, grooming, AI-generated images, misinformation and radicalisation

Everyone at NST should know how to recognise and report neglect, physical, emotional and sexual abuse, exploitation, bullying, sexual harassment, sexual violence, radicalisation and FGM.

2. Key contacts and personnel responsible for safeguarding

If anyone is in immediate danger, call **999** first, then tell the DSL.

NST Safeguarding and Prevent team

Role	Name	Telephone	Email
Designated Safeguarding Lead (DSL)	Zak Vesamia	020 7247 5497 · out of hours 07553 071 775	zak@nextsteptrainingltd.co.uk
Deputy Designated Safeguarding Lead	Mariyah Askor	020 7247 5497	[email to confirm]
Safeguarding Officer	Tehseen Ikhlake	020 7247 5497	[email to confirm]
Prevent Lead	Laura Stephens Nield	020 7247 5497	laura@nextsteptrainingltd.co.uk
Managing Director and Safer Recruitment Lead	Ahmed Khan	020 7247 5497	ahmed@nextsteptrainingltd.co.uk
Chair of the Board and safeguarding link governor	Leanne Edwards	Via the NST office	[email to confirm]
Shared safeguarding mailbox	Safeguarding and Prevent team	—	[shared mailbox address to confirm]

NST office: 020 7247 5497 or 020 3352 7235. Address: Unit A2, Ment House, 1B Mentmore Terrace, London E8 3DQ. The same team is named on NST's safeguarding web page.

External contacts

Service	Telephone	Email / web
Hackney MASH (children's social care), Mon–Fri 9am–5pm	020 8356 5500	MASH@hackney.gov.uk · hackney.gov.uk/child-protection
Hackney Emergency Duty Team (out of hours)	020 8356 2710	—
Hackney LADO (allegations against staff)	020 8356 4569	lado@hackney.gov.uk
Hackney Prevent Team	020 8356 8104	prevent@hackney.gov.uk
Met Police SO15 Prevent (North East)	020 7275 4652	SO15Mailbox- .LocalOpsNorthEastTeam3@met.police.uk
Learners who live outside Hackney	—	Children's or adult social care and the Prevent team for the area where the learner lives; the DSL holds the list
Police — emergency / non-emergency	999 / 101	—
Anti-Terrorist Hotline	0800 789 321	—
Rape and Sexual Abuse Support Line (Rape Crisis, 24/7, age 16+)	0808 500 2222	—
Childline (under 19)	0800 1111	—
NSPCC Helpline (adults worried about a child)	0808 800 5000	—
NSPCC Whistleblowing Advice Line	0800 028 0285	help@nspcc.org.uk

Contacts are checked every term. Named individuals at external agencies are not listed, because they change; always use the team line or mailbox.

Role of the DSL

The DSL is a senior member of staff with lead responsibility for safeguarding and child protection, including online safety, filtering and monitoring, and Prevent. The DSL role is set out in KCSIE Annex B and NST's DSL role description. The DSL will:

- manage referrals to children's or adult social care, the LADO, the police and Prevent, in the area where the learner lives
- decide, with the apprentice's tutor, whether a concern can be managed internally or needs Family Help or a statutory referral
- keep secure, accurate child protection records and transfer them when an apprentice moves provider

- keep up to date with local arrangements set by the City and Hackney Safeguarding Children Partnership and brief staff on changes
- report to the Board of Governors at every meeting on safeguarding and Prevent activity, with a quarterly anonymised summary of concerns

Role of the Prevent Lead and Safeguarding Officer

- The **Prevent Lead** leads Prevent training for staff and apprentices, keeps the Prevent risk assessment and action plan up to date, holds contacts with local Prevent teams and DfE Prevent co-ordinators, and advises the DSL on Prevent concerns. The DSL keeps the decision on whether to make a referral.
- The **Safeguarding Officer** is a first point of contact for apprentices and employers, records concerns and passes them to the DSL the same day, and helps make sure employers know NST's reporting route.

DSL cover arrangements

KCSIE 2026 requires cover for the DSL to be clear, reliable and known. When the DSL is absent through leave, sickness or other reasons:

1. The Deputy DSL, Marihah Askor, takes on the role. If both are absent, a trained member of the senior leadership team covers, as named on the staff noticeboard and in the weekly bulletin.
2. Concerns can always be sent to the shared safeguarding mailbox, which the DSL, Deputy DSL, Safeguarding Officer and Prevent Lead monitor during working hours.
3. The DSL tells the safeguarding team in advance of any planned absence.
4. A remote DSL may be nominated in exceptional circumstances, with the Managing Director's approval, provided they are available and easily contactable.

Training requirements

Who	Training	Frequency
All staff	Read KCSIE 2026 Part one in full (Annex A summary has been withdrawn) and sign to confirm	On joining and each September
All staff	Level 2 Safeguarding Children, including Prevent, FGM, online safety, sexual harassment and child-on-child abuse	Within 2 weeks of starting; refresher every 2 years
All staff	Home Office Prevent duty training: Prevent awareness and Prevent referrals	Before working with apprentices; refresher every 2 years
All staff	Safeguarding updates (staff meetings, bulletins, e-learning), including termly Prevent briefings on current themes	At least termly
All staff	Mandatory reporting of child sexual abuse briefing	When government guidance is published, then at induction

Who	Training	Frequency
DSL, Deputy DSL, Safeguarding Officer, Prevent Lead	Local-authority DSL training; advanced Prevent and Channel awareness; domestic abuse; CSE/CCE; FGM; responding to sexual violence and harassment	Every 2 years, with annual updates
DSL team	Online safety, filtering and monitoring	Annually
Managers and anyone who interviews	Safer Recruitment	Every 2 years
Governors	Safeguarding and Prevent update and awareness	Annually

Training records are held by HR and reviewed quarterly by the DSL. New staff complete safeguarding and Prevent training before they work with apprentices. All staff must have enough English to keep records, liaise with agencies, summon emergency help and understand instructions.

Staff have quarterly reviews and twice-yearly appraisals, where they can raise concerns about apprentices' welfare and their own wellbeing.

3. Pastoral responsibility

Every member of staff is responsible for apprentices' safety, but Assessor/Tutors hold specific responsibility for the apprentices in their caseload.

Knowing each apprentice

Assessor/Tutors build a thorough understanding of each apprentice by:

- reviewing application, enrolment and initial assessment information, including any Education, Health and Care Plan (EHCP) or Additional Learning Support needs
- understanding their home, work, social and financial circumstances, and any risks from outside NST (contextual safeguarding)
- recognising apprentices who may need extra support or Family Help, including those who are young carers, pregnant or parents, care-experienced, living with a medical condition or disability, or who have shown early signs of harmful behaviour
- remembering that apprentices with special educational needs or disabilities may not recognise that what is happening to them is abuse, and may find it harder to tell someone
- being professionally curious: never assuming that no reports means nothing is happening

Warning signs to act on

- unexplained or persistent absence from training or work, or going missing
- changes in behaviour, mood, appearance or sleep; withdrawal; disengagement
- self-harm, suicidal thoughts or other signs of serious mental health difficulty — KCSIE 2026 treats these as safeguarding concerns in their own right
- signs of exploitation, such as unexplained money, gifts, phones or new older associates
- signs of sexual harassment or abuse at work, in training or online
- harmful or abusive behaviour towards others, which may mean the apprentice is also a victim

In an emergency, call 999. Otherwise, report to the DSL the same day (Section 7).

Actions and records

Assessor/Tutors will:

- complete Individual Learning Plans and individual risk assessments where needed
- meet apprentices to explore absence or behaviour changes, and record what was discussed
- share relevant information with colleagues on a need-to-know basis
- recommend changes to the programme when an apprentice's welfare requires it
- tell relevant staff about an apprentice's support needs and check those supports are working
- escalate to the DSL whenever a concern exceeds their expertise

Apprentice induction

Every apprentice's induction includes a specific safeguarding and Prevent session, covering:

- NST's safeguarding policies, the Safeguarding and Prevent team and how to report a concern, including radicalisation and contact with extremist groups
- their own responsibility for their safety and that of others
- healthy relationships, consent, and zero tolerance of sexual harassment, sexual violence, misogyny and discrimination, at NST, at work and online
- online safety, including AI-generated images and misinformation
- the Education and Training Foundation's free online safeguarding and Prevent training for learners

A short knowledge check at the end of the session confirms that apprentices know the risks and how to report a concern.

4. Information sharing and data protection

Data protection law never prevents NST from sharing information needed to keep a child or adult at risk safe. KCSIE 2026 is explicit on this point.

NST handles personal data in line with the UK GDPR and the Data Protection Act 2018, as amended by the Data (Use and Access) Act 2025. Our Data Protection Policy covers collection, storage, retention, sharing, breaches, third-party requests and the role of the Data Protection Officer (DPO).

For safeguarding:

- staff share information with the DSL straight away, even if an apprentice asks them not to; staff never promise to keep a disclosure secret
- the DSL shares information with agencies where it is necessary and proportionate, using the DfE's information-sharing advice; consent is not needed when a child is at risk of harm, or to make a Prevent referral
- child protection records are kept separately and securely, with access limited to the DSL team
- when an apprentice moves to another provider, the DSL transfers the child protection file securely within 5 school days and confirms receipt; where there are significant concerns, including risk to others, the DSL speaks directly to the receiving DSL
- records state facts, distinguish fact from opinion, and record decisions and the reasons for them
- the identity of anyone who reports a sexual offence is protected; staff never share details that could identify them, including on social media

The DSL and DPO work together to train staff on these rules.

5. Employer and workplace responsibilities

NST stays responsible for apprentices' safeguarding while they are at their workplace. Most apprentices work in nurseries, care settings and other workplaces across England, so employers are often the first to see a concern.

- Before an apprentice starts, the onboarding adviser completes a health and safety checklist and a workplace safeguarding risk assessment with the employer. This covers safeguarding, Prevent and sexual harassment for every apprentice, not only those under 18, and is reviewed at least annually.
- The contract for services, training plan, employer handbook and employer induction set out the employer's duty to report safeguarding, Prevent and sexual harassment concerns involving an apprentice to NST's DSL, with the Safeguarding and Prevent team's contact details.
- Employers receive NST's guidance on safeguarding, Prevent, sexual harassment, British values, and equality, diversity and inclusion.
- Employers must tell NST's DSL promptly about any safeguarding concern involving an apprentice, including a concern that an apprentice may be harmed by, or may harm, a colleague, customer or service user.
- Employers have their own legal duty to take reasonable steps to prevent sexual harassment of their employees, including apprentices. NST may ask what steps they take, and will act under Section 9 if an apprentice is harassed at work.
- Employers supervising apprentices under 18 must have suitable checks and safeguarding arrangements in place; NST asks for written confirmation of these.
- Safeguarding is discussed at every progress review with the employer.
- NST does not subcontract its apprenticeship provision. If it does so in future, it will obtain written assurance that the subcontractor's staff have had the right safeguarding checks, and monitor arrangements through regular visits and reviews.

6. Safer recruitment, induction, training and review

NST follows KCSIE 2026 Part three and its Safer Recruitment Policy, Associated Persons Policy and Recruiting Ex-Offenders Policy for everyone who works with apprentices.

Recruitment and vetting

Every appointment includes:

- a clear job advert and person specification that state NST's commitment to safeguarding
- a full application form (CVs alone are not accepted) and shortlisting against set criteria
- an online search of shortlisted candidates, with candidates told this will happen
- an interview that tests safeguarding awareness and explores gaps in employment history
- two references, at least one from the most recent employer, obtained before interview where possible
- identity, right-to-work, qualification and medical fitness checks
- an enhanced DBS check, with a children's barred list check for anyone in regulated activity
- overseas checks for candidates who have lived or worked abroad

All checks are recorded on NST's Single Central Record, which is audited every term and reported to the Board. Copies of DBS and qualification checks are kept for administrative staff as well as teaching staff. If a DBS certificate has not arrived before a start date, the person may only start with a separate children's barred list check, all other checks completed, a risk assessment and close supervision.

Everyone who interviews must complete Safer Recruitment training and refresh it every 2 years.

Volunteers, contractors and visitors

The Crime and Policing Act 2026 has removed the "supervision exemption". Anyone who teaches, trains, instructs or supervises apprentices under 18 on more than 3 days in any 30-day period, or overnight, is now in regulated activity **even if they are supervised**.

- **Volunteers** in regulated activity need an enhanced DBS check with barred list check. This applies to existing volunteers as well as new ones. Other volunteers are risk-assessed for whether a lower-level check is appropriate. Volunteers are never left alone with apprentices without an assessment, and may be referred to the DBS if the harm threshold is met.
- **Contractors** working on site must have the appropriate DBS check or be supervised at all times, depending on their work.
- **External speakers and visitors** follow Section 15.

Induction

All new staff complete an induction run by HR before the end of probation, covering:

- this policy, the Child and Vulnerable Adult Protection Policy and the staff Code of Conduct
- KCSIE 2026 Part one, with signed confirmation
- Level 2 Safeguarding, Home Office Prevent awareness and referrals training, FGM, online safety, sexual harassment, whistleblowing, equality and diversity, data protection and health and safety
- who the Safeguarding and Prevent team are and how to report concerns
- a tour of NST facilities and the roles of the senior leadership team, HR and tutors

Probation and ongoing review

Managers review new staff at 1, 3 and 6 months; probation can be extended by 3 months. After probation, regular supervision and appraisal cover performance, safeguarding practice, training needs and wellbeing.

7. Reporting a safeguarding concern

If you are worried about an apprentice, tell the DSL the same day. If someone is in immediate danger, call 999 first.

When an apprentice tells you something

- Listen calmly, using open, non-judgemental questions. Do not ask leading questions or investigate.
- Reassure them they are being taken seriously and that they are not to blame. Recognise the trust they have placed in you.
- Never promise confidentiality; explain who you will need to tell and why.

- Write down what was said in their own words as soon as possible, with the date, time and your signature.

Steps to follow

1. **Immediate danger:** call 999, then tell the DSL.
2. **All other concerns:** speak to the DSL, Zak Vesamia, or the Deputy DSL, Mariah Askor, on 020 7247 5497, or email the shared safeguarding mailbox. Prevent concerns can also go to the Prevent Lead, Laura Stephens Nield, who will involve the DSL.
3. **Record it:** complete the Safeguarding Report Form (Appendix C) the same day and send it to the DSL.
4. **If the DSL team cannot be reached** and the concern is urgent, contact Hackney MASH (020 8356 5500) or, out of hours, the Emergency Duty Team (020 8356 2710), or the social care team where the learner lives. Any member of staff can make a referral; tell the DSL as soon as possible afterwards.
5. **Follow up:** if you do not think the concern has been acted on, raise it again with the DSL or the Managing Director, or use the whistleblowing procedure (Section 10).

Mandatory reporting duties

- **Child sexual abuse:** the Crime and Policing Act 2026 creates a legal duty for people in regulated activity to report child sexual abuse when a child or another person tells them about it, or when they witness it. Preventing or trying to stop someone from reporting is a criminal offence. NST will update this section when the government publishes its guidance and confirms the start date; until then, all such concerns go to the DSL immediately, who will refer to children's social care and the police.
- **FGM:** if an apprentice under 18 tells you they have had FGM, or you see signs of it, you must personally report it to the police by calling 101, and tell the DSL.

What the DSL does next

The DSL decides, using the Hackney Child Wellbeing Framework (or the framework where the learner lives), whether to:

- manage the concern internally with a support plan
- refer to Family Help or make a referral to MASH, which may lead to a section 47 child protection enquiry
- refer to the police, Prevent or the modern slavery National Referral Mechanism

When managing support internally, the DSL considers whether to inform parents or carers of apprentices under 18, unless doing so would put the apprentice at further risk. The DSL records every decision and the reason for it, and tells the referring staff member the outcome where appropriate.

For adults at risk, the DSL refers to the adult social care team in the borough where the person lives.

8. Allegations and concerns about staff

Any concern or allegation about a member of staff, volunteer, contractor or governor must go to the DSL or Managing Director immediately. If it concerns the DSL, report it to the Managing Director. If it concerns the Managing Director, report it to the Chair of the Board of Governors, Leanne Edwards.

NST follows KCSIE 2026 Part four. All staff must behave professionally at all times and avoid putting themselves in vulnerable or compromising situations, in line with the staff Code of Conduct. Sexual harassment of apprentices or colleagues by staff is gross misconduct.

Allegations that may meet the harm threshold

An allegation meets the threshold if someone has, or may have:

- behaved in a way that has harmed, or may have harmed, a child
- committed a criminal offence against or related to a child
- behaved towards a child in a way that suggests they may pose a risk of harm
- behaved in a way that suggests they may not be suitable to work with children, including outside work

When a concern is first raised, the DSL and Managing Director consider straight away whether to refer to the LADO, and refer within one working day where the threshold may be met. Hackney LADO: 020 8356 4569, lado@hackney.gov.uk.

The DSL and Managing Director will:

- not investigate before speaking to the LADO, and contact the police immediately where there is a risk of immediate harm or a possible crime
- consider, with the LADO, whether suspension is needed; suspension is not automatic, is a neutral act and does not imply guilt; alternatives are considered first
- keep the person informed, offer support, and protect confidentiality
- handle allegations about agency staff and trainee staff in the same way, working with their employer
- refer to the DBS where the person is dismissed or would have been, or leaves, because they harmed or posed a risk to a child — including volunteers

Outcomes are recorded as **substantiated**, **unsubstantiated**, **unfounded**, **false** or **malicious**. Abuse of apprentices, learners or staff is gross misconduct and, if substantiated, will lead to dismissal.

Low-level concerns

A low-level concern is any concern, however small, that an adult has acted in a way that does not match the Code of Conduct but does not meet the harm threshold. Examples include being over-friendly, using personal social media to contact apprentices, or using inappropriate language.

- Staff share low-level concerns with the DSL, including about themselves (self-reporting).
- The DSL records them confidentially, reviews them for patterns, and decides whether they should be referred to the LADO if repeated or more serious.
- Records are kept at least until the person leaves NST.

Concerns about people at an apprentice's workplace

If an apprentice's manager, colleague or another adult at their workplace may have harmed a child, or may pose a risk to children, the DSL consults the LADO for the area where the workplace is. This matters particularly for early years settings. Concerns about harm to an adult at risk go to adult social care.

Allegations against apprentices outside NST

If an apprentice is accused of harming a child or adult at work or elsewhere, the DSL assesses the risk to other apprentices and agrees a support and safety plan, working with the employer and relevant agencies.

9. Peer-on-peer abuse, sexual harassment and sexual violence

NST has a zero-tolerance approach to sexual harassment, sexual violence and all forms of peer-on-peer abuse. It is never dismissed as "banter", "just having a laugh" or "part of growing up". This section applies whether the people involved are under or over 18, and whether it happens during training, online, at work or travelling. Where the people involved are under 18, NST follows KCSIE 2026 Part five, "Child-on-child sexual harassment and sexual violence".

What it includes

Type	Examples
Sexual violence	Rape, assault by penetration, sexual assault, and causing someone to engage in sexual activity without consent (Sexual Offences Act 2003).
Sexual harassment	Unwanted conduct of a sexual nature, in person or online, that violates someone's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment. This includes sexual comments, remarks, jokes or taunts; unwanted touching or deliberately brushing against someone; displaying sexual pictures; unwanted sexual messages; and sexualised online bullying.
Image-based abuse	Making or sharing nudes and semi-nudes without consent, including images that are digitally altered or wholly generated by AI ("deepfakes"), threats to share images, and upskirting. Taking, making or sharing nude images of anyone under 18 is a criminal offence, even with their consent and even if the image is AI-generated.
Harmful sexual behaviour (HSB)	Sexual behaviour by under-18s that is problematic, abusive or violent. HSB exists on a continuum, from developmentally expected behaviour to behaviour that causes harm.
Other peer-on-peer abuse	Bullying, including cyberbullying and prejudice-based or discriminatory bullying such as racism, misogyny and faith-targeted abuse; abuse in intimate relationships between peers; physical abuse; initiation or hazing; serious violence, including carrying or threatening to use weapons.

Consent means agreeing by choice, with the freedom and capacity to make that choice. Consent can be withdrawn at any time. Misogyny can escalate towards sexual harassment and violence, so staff challenge sexist and misogynistic language and attitudes early. Even where there are no reports, staff assume this abuse may be happening.

Where it can happen

- in classroom and online training sessions, and in NST group chats or platforms
- at the apprentice's workplace, from a colleague, manager, customer, service user or other third party

- travelling to and from training or work
- on social media and messaging apps, often across several platforms

Signs to look for

- absence from work or training, disengagement or a drop in performance
- injuries, anxiety, panic attacks, depression or withdrawal
- changes in appearance, sleep or behaviour, including substance misuse
- reluctance to go to a particular workplace, session or shift, or to be near a particular person
- abusive or sexualised behaviour towards others

Responding to a report: all staff

1. **Make people safe.** If anyone is in immediate danger, call 999. Then tell the DSL.
2. **Listen and reassure.** Respond with empathy, take the report seriously and tell the person they will be supported and kept as safe as possible. Do not ask leading questions, investigate or judge. A poor response can stop people telling anyone again.
3. **Do not promise confidentiality.** Explain that you must tell the DSL, and who else may need to know.
4. **Never view, copy, print, forward or save nude or sexual images.** If a device is involved, tell the DSL, who will decide what to do.
5. **Record what was said** in the person's own words, with the date, time and your signature, as soon as possible after the conversation, and send it to the DSL the same day. Where possible, two members of staff, one from the safeguarding team, are present when a report of sexual violence is made.
6. **Tell the DSL immediately** for sexual violence, and the same day for any other report. Do not tell the alleged perpetrator, and do not discuss the report with anyone else.

What the DSL does next

The DSL completes a **risk and needs assessment** for the victim, the alleged perpetrator and anyone else affected, including other apprentices and colleagues at the workplace. The assessment considers the victim's wishes, the nature of the incident, the ages and development of those involved, any imbalance of power, ongoing risk, and related issues such as domestic abuse or exploitation. It is recorded and reviewed regularly.

For reports involving under-18s, the DSL chooses one or more of the KCSIE 2026 options:

1. **Manage internally**, for one-off incidents of sexual harassment where the victim's needs can be met within NST, with support for those involved.
2. **Universal services and a community-based Early Help assessment**, involving health, youth and other local services.
3. **Referral to Family Help**, including targeted early help and children's social care, where a child has been harmed, is at risk of harm or is in immediate danger.
4. **Report to the police**, alongside a referral to children's social care, for any report of rape, assault by penetration or sexual assault. The DSL agrees with the police and social care how to protect and support the victim and others while any investigation takes place.

For reports involving adults, the DSL:

- supports the victim to decide whether to report to the police, and respects their wishes, unless others are at risk (including children), the person lacks capacity to decide, or a serious crime has been committed, when the DSL may report without consent and explains why
- refers to adult social care where the person has care and support needs and cannot protect themselves (Care Act 2014)
- agrees a safety plan with the victim, which may include changing training groups, session times or online arrangements

When it happens at work

- With the apprentice's agreement where they are an adult, or straight away where they are under 18 or at risk, the DSL tells the employer and agrees a safety plan. Employers have a legal duty to take reasonable steps to prevent sexual harassment of their employees, including harassment by customers, service users and other third parties.
- If the employer does not act, or the alleged perpetrator is the apprentice's manager or employer, NST may pause the apprenticeship at that workplace and help the apprentice to find a safe alternative.
- If the alleged perpetrator works with children or adults at risk (for example in a nursery or care home), the DSL consults the LADO or adult social care (Section 8).

Supporting everyone involved

- The victim has a named contact at NST and is offered support, which can include their tutor, the Safeguarding Officer, counselling and specialist services such as the Rape and Sexual Abuse Support Line (0808 500 2222, 24/7, age 16+) or Childline (0800 1111).
- Victims of sexual offences have a legal right to anonymity. Staff protect their identity and challenge gossip, including on social media.
- The alleged perpetrator is also supported and is not assumed to be guilty while the facts are established. Where they are an NST apprentice, the DSL decides how to keep them apart from the victim and others, taking account of any police or bail conditions.
- Sanctions under the apprentice code of conduct are considered once any police investigation allows, and do not replace a safeguarding response.
- Parents or carers of apprentices under 18 are informed unless that would put the apprentice at further risk.

Making or sharing nudes

All incidents of making or sharing nudes or semi-nudes, whether consensual or not, receive a proportionate safeguarding response, not just a disciplinary one. For under-18s, the DSL follows the UK Council for Internet Safety advice and can help the young person use Childline and the Internet Watch Foundation's Report Remove tool. For adults, sharing or threatening to share intimate images without consent, including AI-generated images, can be a criminal offence, and the DSL supports the victim to report it.

Prevention and review

- teaching apprentices about consent, respectful relationships, sexual harassment at work and the law, including image-based abuse
- challenging derogatory, sexualised, misogynistic or discriminatory language and behaviour

- staying alert to gender-specific risks, such as sexualised touching of female apprentices and hazing of male apprentices
- making sure employers know how to report sexual harassment involving an apprentice (Section 5)
- recording all incidents securely and reviewing them each term for patterns, including by workplace and employer, and reporting anonymised themes to the Board
- working with CAMHS, the police, children's and adult social care and specialist services where needed

10. Whistleblowing

Staff who are worried about wrongdoing at NST, or at a workplace they visit, must raise it. Failing to report a safeguarding concern is misconduct.

Examples include a criminal offence such as fraud, a danger to someone's health and safety, sexual harassment, damage to the environment, a breach of legal obligations, a miscarriage of justice, or someone covering up any of these. Since 6 April 2026, a disclosure about sexual harassment is expressly protected under the Employment Rights Act 2025. Personal grievances go through the grievance procedure instead.

How to raise a concern

1. Report it to the DSL or the Managing Director. Safeguarding concerns are handled urgently under Section 7, Section 8 or Section 9.
2. Concerns about apprentices or their workplaces go to NST first (the Assessor/Tutor or DSL), not directly to the workplace manager.
3. If the concern is about the Managing Director, or you feel it has not been taken seriously, raise it with the Chair of the Board of Governors, Leanne Edwards.
4. You can also go outside NST: the NSPCC Whistleblowing Advice Line (0800 028 0285, help@nspcc.org.uk), the LADO, Ofsted or the Department for Education.

Protection

The Public Interest Disclosure Act 1998 protects staff who make a disclosure in the public interest. NST will not tolerate victimisation of anyone who raises a concern in good faith. Disclosures are treated in confidence. Knowingly false or malicious reports will lead to disciplinary action.

NST investigates every report, records the findings, and refers safeguarding cases to the City and Hackney Safeguarding Children Partnership where appropriate.

11. Prevent duty, radicalisation and extremism

NST has a legal duty under section 26 of the Counter-Terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism. We treat Prevent as part of everyday safeguarding, using the same reporting routes. The Prevent Lead, Laura Stephens Nield, leads this work with the DSL.

NST follows the Prevent duty guidance for England and Wales (2023), the Home Office's Notice, Check, Share guidance on Prevent thresholds, the DfE's guidance for work-based learners, and the DfE's 2026 practical guidance for designated safeguarding leads. NST's Prevent Risk Assessment and Action Plan

2026-27 sets out the specific risks for NST's apprentices and what is being done about them; it is reviewed by the DSL every term and approved by the Board each year.

Prevent is one of the four strands of the government's CONTEST counter-terrorism strategy: Prevent (stop people becoming terrorists or supporting terrorism), Pursue (stop attacks), Protect (strengthen protection) and Prepare (reduce the impact of an attack).

What staff need to know

- Radicalisation can affect anyone, whatever their age or background, and often involves grooming, especially online.
- Concerns include Islamist and extreme right-wing terrorism; mixed, unclear or unstable ideologies; fascination with extreme violence or mass-casualty attacks; and extreme misogyny, including "incel" ideology. An ideology does not need to be identified for a concern to be raised.
- Behaviours that may cause concern include a sudden change in behaviour or attitude; withdrawal or new friendship groups; "us and them" or dehumanising language; grievance against groups; growing interest in extremist groups, symbols or conspiracy theories; glorifying violence; online secrecy or sharing extremist material; a fixation with weapons or explosives; and antisemitism or other hatred of a group. No single sign is proof; look for patterns over time.
- Vulnerabilities such as isolation, grievance, trauma, mental health needs or neurodiversity are not signs of radicalisation in themselves, but can make someone more susceptible.
- Most NST apprentices live outside Hackney, so referrals go to the Prevent team for the area where the learner lives.

Reporting a Prevent concern

1. **Immediate risk:** call 999, or the Anti-Terrorist Hotline on 0800 789 321.
2. **All other concerns:** tell the DSL or the Prevent Lead the same day. Do not wait for proof or gather more evidence first.
3. The DSL, with the Prevent Lead, considers what is known, checks records, and seeks advice where unsure from the local authority Prevent team or the DfE regional Prevent co-ordinator. Where the concern suggests the person may be susceptible to being drawn into terrorism, the DSL completes the **National Prevent Referral Form** for the area where they live. Consent is not needed to make a referral. If the concern is about something else, such as general violence or mental health, the DSL uses the right alternative service.
4. Counter Terrorism Policing assesses the referral. Outcomes include no further Prevent action, signposting to other support, or consideration by a Channel panel for voluntary multi-agency support. The DSL attends Channel meetings when invited and keeps supporting the learner.
5. Where the person is also at risk of other harm, the DSL refers to children's or adult social care as well.
6. The DSL records every concern and decision, including the reasons for not referring.

Families and friends may call ACT Early on 0800 011 3764 for confidential advice.

Building resilience

- All staff complete Home Office Prevent awareness and referrals training, with termly briefings on current themes; the DSL team completes advanced Prevent and Channel awareness training.

- Every apprentice has a Prevent session at induction, and Prevent is built into each programme using examples from early years, adult care and other workplaces.
- British values — democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs — are embedded in the curriculum and progress reviews.
- Apprentices learn to spot extremist content, misinformation, disinformation and conspiracy theories online.
- NST's IT systems are filtered and monitored for extremist content (Section 13). NST does not use external speakers; any future speaker is checked first (Section 15).
- NST completes the DfE's Prevent duty self-assessment for further education each year and acts on it.

12. Safeguarding across different locations

NST trains apprentices at its Hackney office, in their workplaces across England and online, so safeguarding arrangements follow the apprentice.

Local risks

Using data from the City and Hackney Safeguarding Children Partnership, the Metropolitan Police, local Counter-Terrorism Local Profile briefings and the areas where apprentices live and work, NST prioritises:

- violence against women and girls, sexual violence, sexual harassment and misogyny
- child criminal and sexual exploitation, county lines, gangs and "cuckooing"
- serious violence and knife crime
- online grooming and image-based abuse
- hate crime and discrimination
- extremism (Islamist, extreme right-wing, and mixed or unclear ideologies)
- domestic abuse, including child-to-parent abuse
- modern slavery and human trafficking
- drug misuse and antisocial behaviour

These risks are built into staff training, apprentice reviews and workshops on personal safety, such as travelling late, using public transport and meeting people from online.

Workplace visits

When visiting apprentices, staff must:

- keep personal phones away during contact time and never photograph or film apprentices on personal devices
- take and store any images only on NST devices, with written consent, in line with data protection law
- carry out a site-specific risk assessment and follow the lone working procedure (Section 14)
- report any safeguarding concern to the DSL or Deputy DSL the same day

13. Online safety, filtering and monitoring

NST welcomes technology, including social media and AI tools, as part of learning, but manages the risks under KCSIE's four Cs:

Risk	Examples
Content	Pornography, racism, misogyny, self-harm, extremism, misinformation, disinformation and conspiracy theories
Contact	Grooming, exploitation and radicalisation by adults or peers, including through AI chatbots
Conduct	Cyberbullying, sexual harassment online, making or sharing nudes, AI-generated "deepfake" images
Commerce	Online gambling, scams, phishing and inappropriate advertising

Filtering and monitoring

- NST's IT systems use filtering and monitoring that meet the DfE's filtering and monitoring standards.
- Sayed Nafis (MIS and Compliance) is responsible for filtering and monitoring day to day, supported by the DSL and IT provider; the Managing Director is the accountable senior leader.
- The effectiveness of filtering and monitoring is reviewed **at least once every academic year**, testing that it works on every internet-connected NST device in all locations. Each review is recorded, and a summary is reported to the Board.
- The DSL receives and acts on monitoring alerts.
- Many apprentices use their own devices, so NST gives them guidance on staying safe online and reporting harmful content.

Using AI safely

Staff and apprentices follow the DfE guidance on generative AI in education. Personal data about apprentices must not be entered into AI tools not approved by NST. Misuse of AI to create harmful or sexual images of others is treated as a serious safeguarding matter (Section 9).

Expected behaviour

- All staff follow NST's Internet, Email and Social Media Policy and the staff Code of Conduct. Staff do not contact apprentices through personal accounts.
- Assessors guide apprentices to safe, reliable sources, and cover online safety and cyber security in reviews.
- Offensive, abusive, sexual or extremist content shared by apprentices is investigated and removed, and may lead to disciplinary action or removal from the course.
- Apprentices report anything worrying to their assessor or the Safeguarding and Prevent team. Concerns about online abuse are handled under Sections 7, 9 and 11.
- Systems are protected with antivirus and security software, in line with DfE cyber security standards.

14. Lone working

NST reduces lone working wherever possible and protects staff who must work alone.

- **In the office:** keep doors and windows secure, know the emergency exits, keep a phone and emergency numbers to hand, and park in a well-lit area close to the building.
- **In the field:** keep the shared electronic diary up to date with locations; stay contactable; tell your line manager before going anywhere without signal, with the expected duration.
- **Visits at night or in higher-risk areas:** tell your line manager your travel plans, check in on arrival, and confirm when you are safely back at the office or home.
- **On site:** let on-site staff know where you are, especially when meeting new employers or apprentices.
- **Travelling:** plan routes in advance, keep to well-lit, busy areas, have fares ready, keep belongings out of sight, and use phones discreetly.
- Panic alarms are available on request. Report any incident or near-miss to your line manager straight away.

15. Additional safeguarding measures

Apprentices with criminal convictions

Apprentices with relevant convictions are risk-assessed before they start. The DSL considers the nature of the offence, the risk to other learners and staff, and the controls needed, consulting probation services where appropriate. Risk assessments are reviewed at least termly.

External speakers and visitors

NST is a small private training provider and does not use external speakers or hold events for apprentices. If a speaker or visitor is ever invited to deliver to apprentices, in person or online, the DSL must approve it in advance after checking their background, content and purpose against this policy and the Prevent duty. A log records each visitor's name, purpose, date and the checks completed. Visitors are supervised by their NST host and wear a visitor badge.

Gender-questioning apprentices

Where an apprentice or their parent raises questions about gender, NST follows KCSIE 2026. Staff do not initiate any action. For apprentices under 18, parents or carers are involved unless there is a significant risk of harm in doing so, in which case the DSL decides the next steps. Decisions are made case by case, with the apprentice's wellbeing as the priority, and are recorded.

Mental health

NST takes a whole-organisation approach to mental health. Self-harm, suicidal thoughts and serious mental health concerns are reported to the DSL as safeguarding concerns. The DSL refers to CAMHS, the GP or crisis services as needed, and calls 999 in an emergency.

Appendix A — Summary of 2026 changes to statutory guidance and law

Change	Source	Where in this policy
All staff must read KCSIE Part one in full; the Annex A summary is withdrawn and annexes renumbered	KCSIE 2026	2

Change	Source	Where in this policy
"Robust" DSL cover arrangements that are clear, reliable and known, e.g. a shared mailbox	KCSIE 2026	2
Family Help terminology; all staff aware of Family Help and section 47 referral routes; wider list of children who may need early help	KCSIE 2026, Working Together 2026	1, 3, 7, 9
Self-harm and suicidal ideation listed as safeguarding concerns; expanded mental health section	KCSIE 2026	3, 15
Anti-racist and anti-discriminatory practice; prejudice-based harm recognised	KCSIE 2026, Working Together 2026	1, 9
Updated definitions: emotional abuse includes verbal abuse; sexual abuse definition aligned with Working Together; CCE/CSE may be modern slavery	KCSIE 2026	1, 7
Part five retitled "Child-on-child sexual harassment and sexual violence"; misogyny named as a concern; "risk and needs assessment"; options for managing reports updated to include Family Help	KCSIE 2026	9
"Making or sharing nudes", including AI-generated images; all incidents need a safeguarding response	KCSIE 2026	9, 13
Generative AI recognised as an online safety risk	KCSIE 2026	13
Filtering and monitoring reviewed at least once every academic year, with a record kept	KCSIE 2026	13
Stronger information sharing and child protection file transfer, including risk to others	KCSIE 2026	4
Data protection references updated to the Data (Use and Access) Act 2025	KCSIE 2026	4
Statutory guidance on gender-questioning children, with parental involvement expected in most cases	KCSIE 2026	15
"Supervision exemption" removed: supervised volunteers in regular contact with under-18s are in regulated activity and need enhanced DBS with barred list	Crime and Policing Act 2026, KCSIE 2026	6
Mandatory duty to report child sexual abuse; offence of preventing a report (start date and guidance awaited)	Crime and Policing Act 2026	7
New offences of child criminal exploitation and cuckooing	Crime and Policing Act 2026	1, 12
Early consideration of a LADO referral when a concern about staff is first raised	KCSIE 2026	8
Reforms to children's social care and multi-agency child protection teams	Children's Wellbeing and Schools Act 2026	1
Clearer Prevent thresholds: stopping people becoming involved in or supporting terrorism is the deciding factor; ideology not required; other services considered where Prevent is not suitable	Home Office Notice, Check, Share guidance	11

Change	Source	Where in this policy
Practical Prevent guidance for DSLs, Channel meetings guidance and next-step checklists; weaponry or explosives fixation and antisemitism added to concerning behaviours (2 October 2026)	DfE, September and October 2026	11
Sexual harassment a protected whistleblowing disclosure (6 April 2026); employers' duty strengthened to "all reasonable steps", including third-party harassment (expected 30 October 2026)	Employment Rights Act 2025	1, 5, 9, 10

Appendix B — Main changes in Version 5.1

- Safeguarding and Prevent team updated to the current team: Zak Vesamia (DSL), Mariyah Askor (Deputy DSL), Tehseen Ikhlake (Safeguarding Officer) and Laura Stephens Nield (Prevent Lead), with contact details matching NST's website.
- Section 9 rewritten as "Peer-on-peer abuse, sexual harassment and sexual violence", with step-by-step procedures for all staff and the DSL, covering apprentices under and over 18, incidents at work and online, and support for everyone involved.
- Section 11 updated to the Home Office Notice, Check, Share thresholds guidance and the DfE's 2026 Prevent guidance for DSLs; links to NST's Prevent Risk Assessment and Action Plan 2026-27.
- Employer section updated: workplace risk assessments for all apprentices; Prevent and sexual harassment reporting routes in employer contracts and handbooks.
- Employment Rights Act 2025 and Worker Protection Act 2023 duties on sexual harassment added.
- Specific safeguarding and Prevent session at apprentice induction, with a knowledge check.
- External speakers section updated: NST does not use external speakers; any future speaker is approved by the DSL.
- Corrected the statement that most apprentices are under 18; filtering and monitoring responsibility named; version number now matches the footer.

Main changes in Version 5.0 (from Version 4.2): updated to KCSIE 2026 and Working Together 2026; legislation list corrected; Prevent referral route updated to the National Prevent Referral Form; allegations sections merged; new content on DSL cover, mandatory reporting, filtering and monitoring, AI, mental health, gender-questioning apprentices and the volunteer DBS change.

Appendix C — Safeguarding report form

Complete the same day and send to the DSL by hand, to zak@nextsteptrainingltd.co.uk or the shared safeguarding mailbox, or post FAO Zak Vesamia, Unit A2, Ment House, 1B Mentmore Terrace, London E8 3DQ. Record facts and the person's own words; keep opinion separate.

1. About the apprentice or person

Field	Details
Full name	
Date of birth / age	
Sex	
Address	
Telephone	
Employer / programme	
Known SEND, EHCP or other vulnerability	

2. The concern

Field	Details
Date and time of concern or disclosure	
Location (training, online, workplace, other)	
Type (tick all that apply)	☐ Physical ☐ Emotional ☐ Sexual ☐ Neglect ☐ Exploitation (CCE/CSE) ☐ Child-on-child or peer-on-peer ☐ Sexual harassment ☐ Sexual violence ☐ Image-based abuse ☐ Domestic abuse ☐ Mental health / self-harm ☐ Radicalisation ☐ Online harm ☐ FGM ☐ Discriminatory ☐ Financial ☐ Concern about a staff member ☐ Other
What was seen or said (use the person's own words)	
Anyone else involved or present	
Evidence attached	☐ Yes ☐ No

3. Action taken

Field	Details
Immediate action (e.g. emergency services called, first aid)	
Agencies contacted, with time and date	
Has the person been told what will happen next?	☐ Yes ☐ No
Name, role and signature of staff member	
Date and time form completed	

4. DSL use only

Field	Details
Decision and rationale	
Risk and needs assessment completed?	☐ Yes ☐ Not needed
Referrals made (social care, police, LADO, Prevent, other) and reference numbers	
Parents or carers informed? If not, why	
Employer informed? If not, why	
Follow-up actions and review date	
DSL signature and date	

Sources

- [Keeping children safe in education 2026](#) — DfE
- [KCSIE 2026: child-on-child abuse](#) — Browne Jacobson
- [KCSIE 2026: a practical guide for schools](#) — Farrer & Co, September 2026
- [Working Together to Safeguard Children 2026: what has changed](#) — Farrer & Co, May 2026
- [Mandatory reporting of child sexual abuse](#) — NSPCC, May 2026
- [Crime and Policing Act 2026: IICSA recommendations factsheet](#) — Home Office, May 2026
- [Prevent duty guidance for England and Wales](#) — Home Office, 2023
- [Prevent statistics 2025, including updated thresholds guidance](#) — Home Office written statement
- [Updated Prevent guidance \(Notice, Check, Share\)](#) — Oxfordshire County Council, 2026
- [The Prevent duty: safeguarding learners susceptible to radicalisation](#) — DfE, updated 2 October 2026

- [Guidance for further education providers on work-based learners and the Prevent statutory duty](#) — DfE
- [Employment Rights Act: new harassment measures](#) — DLA Piper, March 2026
- [Employment Rights Act 2025 implementation timeline](#) — VinciWorks, updated July 2026
- [Hackney child protection: if you're worried about a child](#) — London Borough of Hackney
- [NextStep Safeguarding and Prevent team](#) — NST website