

1. Introduction

1.1. Purpose

The purpose of this document is to set out Employ My Ability's (EMA) policy on Safeguarding & Child Protection.

The policy and associated direction contained within it provides guidance to all staff on the legal framework, scope, procedural requirements, training requirements, and specific roles & responsibilities of EMA staff; all of which when combined, provide a robust, safe environment for the delivery of education and social care provision across all settings at EMA.

1.2. Legal and/or regulatory framework

This Policy draws from the relevant requirements of:

- a) The Human Rights Act (1998)
- b) The Protection of Children Act (1999)
- c) The Sexual Offences Act (2003)
- d) Children Act (2004)
- e) Mental capacity Act (2005)
- f) Safeguarding Vulnerable Groups Act (2006)
- g) Health & Social Care Act (2008)
- h) Equality Act (2010)
- i) Children and Families (Act 2014)
- j) Care Act (2014)
- k) Counter-Terrorism and Security Act (2015)
- l) Working Together to Safeguard Children (2018)
- m) Data Protection Act (2018)
- n) Keeping Children Safe in Education (2021)
- o) Pan-Dorset Safeguarding Children Partnership
- p) HMG's Factual Note: Regulated Activity in Relation to Children (Scope) 2012

In considering the above referenced frameworks, EMA implements guidance from the most recently amended versions.

The applicable legal and regulatory frameworks are kept under review, with relevant changes being implemented across EMA as and when required. For example, EMA's consideration of the Data Protection Act encompasses the General Data Protection Regulation.

2. Scope

This policy applies to all EMA directors, advisory trustees, staff (full time, part time, permanent, temporary, or sessional), students, agency staff and volunteers.

Revision	Issue Date	Issued by	Page 1 of 23
8	06/10/21	David Fletcher	

3. Policy statement and associated procedures

3.1. General Policy

At EMA we believe that safeguarding is everybody's responsibility and recognise that our work supports those with a range of complex needs, these are frequently the most vulnerable members of society, and their safety is a priority for EMA.

We believe that it is always unacceptable for children, young people or adults to experience abuse of any kind and we recognise our responsibility to safeguard the welfare of those individuals we work with. We do this by recognising that:

- a) The welfare of children is paramount in all the work we do, therefore in all the decisions we take all children, 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.
- b) Some children are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues.
- c) Working in partnership with children, young people, their parents, carers, and other agencies is essential in promoting young people's welfare.

3.2. Key Policy Objectives

For all employees and volunteers of EMA to ensure that:

- a) Appropriate **action** is taken in a timely manner to safeguard and promote welfare.
- b) All staff are **aware** of their statutory responsibilities with respect to safeguarding.
- c) Staff are properly **trained** in recognising and reporting safeguarding issues.
- d) All staff are **recruited** in line with our Safer Recruitment Policy.

3.3. Policy for Guidance & Training

EMA follow government and local guidance for, and train staff on the below:

- a) Child Sexual Exploitation (CSE)
- b) Child Criminal Exploitation (CCE)
- c) County Lines
- d) Domestic Abuse
- e) Female Genital Mutilation (FGM) Awareness
- f) Forced Marriage
- g) Honour Based Abuse
- h) Prevent Duty
- i) Serious Violence and Knife Crime
- j) E-Safety
- k) Policy in practice
- l) Supporting bereavement and loss
- m) Supporting Mental Health and Wellbeing of Children and Young People

3.4. Pan-Dorset Safeguarding Children Partnership

Under the requirements of Working Together to Safeguard Children (2018), EMA has identified the need to primarily work with Dorset Police; Dorset Clinical Commissioning Group; Bournemouth, Christchurch & Poole Council; Dorset Council; Wiltshire's Safeguarding Vulnerable People Partnership

Revision	Issue Date	Issued by	Page 2 of 23
8	06/10/21	David Fletcher	

(SVPP); Hampshire County Council, and the Somerset County Council, to promote the welfare of local children, including identifying and responding to their needs. EMA will also work in tandem and share information with other Council led safeguarding organisations as required to protect any young person.

3.5. Designated Safeguarding Leads (DSL) responsibilities

Responsibilities of the DSL are to:

- a) Ensure this policy and associated procedures are adhered to.
- b) Respond to queries and advise EMA staff, students, agency staff and volunteers, on how to respond to any concerns relating to children and vulnerable adults, including notifying the correct agencies.
- c) Maintain key contacts and dialogue within the Pan-Dorset Safeguarding Children Partnership.

3.6. Procedure for acting on concerns

It is the responsibility of all staff (not just those specifically working with vulnerable adults), and volunteers working at EMA to record and report concerns. EMA defines a concern as:

“Where there is a belief that a child has been, or is at risk of abuse, or significant harm.”

If a member of staff, or volunteer, has any concerns about an adult’s behaviour towards a student, where the adult is **not an employee or volunteer** working for EMA, they must:

- a) **Not ignore it** – EMA take any concerns very seriously.
- b) Discuss the concerns with one of EMA’s Designated Safeguarding Leads.
- c) Under no circumstances confront the adult or try to investigate the matter themselves.

If a member of staff, or volunteer, has any concerns about an adult’s behaviour towards a student, where the adult **is an employee or volunteer** working for EMA, they must:

- a) report the concerns to one of EMA’s Designated Safeguarding Leads, the Operations Director, or Managing Director.
- b) not confront the adult under question.

EMA will endeavour to ensure that the member of staff or volunteer is treated fairly and honestly, helped to understand the concerns expressed, the process being followed and any outcomes of the process.

However, consideration will be given to the graveness of the allegation before informing the person concerned. In the event of serious allegations, the police will be involved.

In all circumstances, EMA will act quickly and effectively if an allegation is made, or if there is suspicion or concern about a professional or volunteer’s relationship with a child or vulnerable adult, or group thereof, particularly if they have:

- a) Behaved in a way that has harmed, or may have harmed, an individual.
- b) Possibly committed a criminal offence.
- c) Behaved in a way that indicates she/he is unsuitable to work with vulnerable adults.

EMA require all staff are aware that “low-level” concerns that may be evident in the setting, and such behaviour upon observation should be discussed with one of EMA’s Designated Safeguarding Leads.

Revision	Issue Date	Issued by	Page 3 of 23
8	06/10/21	David Fletcher	

“Low level” concerns include but are not limited to: adults working in a manner that is inconsistent with staff code of conduct; inappropriate conduct outside of work; being overly friendly with children; having favourites, taking photos of children on their own mobile phone; engaging with a child alone in a secluded areas or behind closed doors; using inappropriate sexualised, intimidating, or offensive language.

Staff should also refer to the EMA Whistleblowing Policy, which sets out how they can raise any serious concerns they may have, including those that relate to safeguarding issues.

Organisations have a legal requirement to report individuals to the Disclosure and Barring Service (DBS) if they are dismissed or removed from regulated activity (or would have been had they not already left), because they harmed or posed a risk to a child or vulnerable adult. This duty to refer overrides any obligation to withhold information on the grounds of confidentiality.

3.7. Procedure for responding to a disclosure

If a member of staff, or volunteer, is told by a child or vulnerable adult that they, or someone they know, is being abused, the member of staff or volunteer will:

- a) Believe what the person is saying and take it seriously.
- b) Reassure them that they have done the right thing, have not created a problem and that they will be supported and kept safe.
- c) Give them time to talk and do not probe or ask leading questions. (*Investigation is not their responsibility*).
- d) Not promise to keep secrets. (*All allegations of harm or potential harm must be acted upon*).
- e) Explain that they will share this information with the EMA Safeguarding Team who will ensure the appropriate procedures will be followed.
- f) Record what they have been told straight away while it is fresh in their mind. (*Using the actual words spoken as much as possible, rather than their own reinterpretation*).
- g) Ensure that the disclosure is reported on “MyConcern” or directly to one of the EMA Designated Safeguarding Officers. (*If you feel the individual is in immediate danger, take them straight to that staff member, where possible.*).
- h) Ensure that a victim reporting abuse, sexual violence or sexual harassment is never made to feel that they are creating a problem, or be made to feel ashamed for making the report.

The Designated Safeguarding Officers will be responsible for recording essential information about each case and for collecting reports and notes as appropriate.

Any detailed information about a case will be confined to the Safeguarding Team, Operations Director and Managing Director, but where a referral to an external agency is to be made, the Operations Director and Managing Director will advise the nominated Trustee Advisor.

The staff/volunteer reporting the allegations will be kept informed of the progress of the case on a ‘need to know’ basis.

If a report is determined to be unsubstantiated, unfounded, false or malicious, EMA’s Designated Safeguarding Lead should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children’s social care may be appropriate.

If a report is determined to be deliberately invented or malicious, EMA will consider whether any disciplinary action is appropriate against the individual who made it as per the Behaviour Policy.

Revision	Issue Date	Issued by	Page 4 of 23
8	06/10/21	David Fletcher	

3.8. Management of reported concerns and disclosures

Taking into account all the information available, the Designated Safeguarding Officers, Operations Director and the Managing Director will decide on the next steps, which may include taking no further action. Where it is decided that further action is necessary, this may be to:

- a) Seek further advice from Social Services.
- b) Make a referral to Social Services.
- c) Report the incident to a designated Social Worker.
- d) Report the matter to the police if a crime is suspected.

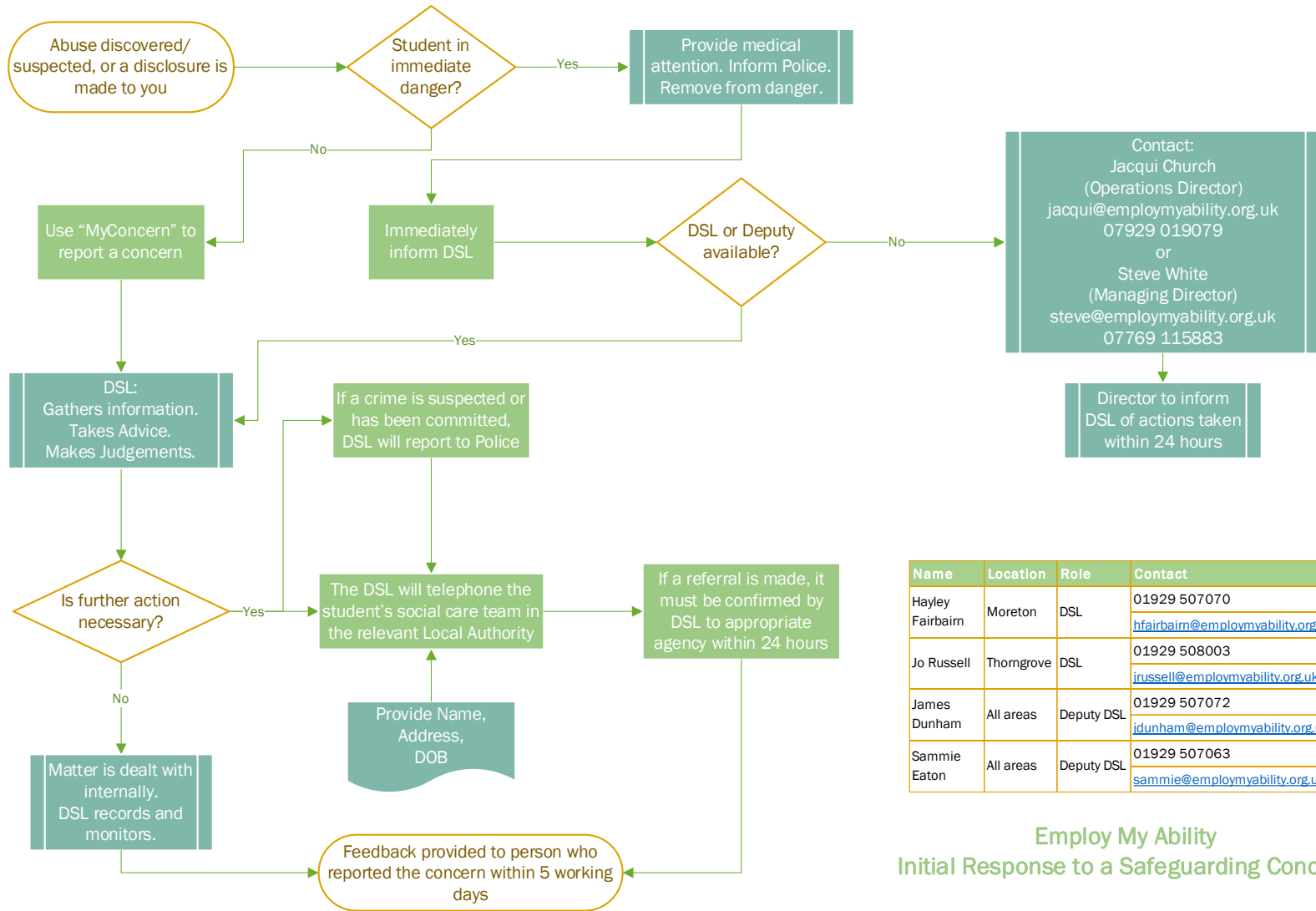
If a referral is made, this must be confirmed in writing to the appropriate agency within 24 hours.

If a member of staff, or volunteer, does not agree with the decision of the Designated Safeguarding Officers, Operations Director and Managing Director that no further action is necessary, the member of staff, or volunteer, has the right and duty to refer the case directly to the relevant Local Authority; relevant local contact detail can be found in section 6.1 of this policy.

The Designated Safeguarding Officers, Operations Director and Managing Director may consider that those involved may require counselling. Where it is felt there is a need for counselling (which could be for the children, vulnerable adults, other clients, staff, or carers involved), the Designated Safeguarding Officers will make the necessary arrangements.

Revision	Issue Date	Issued by	Page 5 of 23
8	06/10/21	David Fletcher	

3.9. Initial response to a Safeguarding Concern



Name	Location	Role	Contact
Hayley Fairbairn	Moreton	DSL	01929 507070 hfairbairn@employmyability.org.uk
Jo Russell	Thorngrove	DSL	01929 508003 irussell@employmyability.org.uk
James Dunham	All areas	Deputy DSL	01929 507072 jdunham@employmyability.org.uk
Sammie Eaton	All areas	Deputy DSL	01929 507063 sammie@employmyability.org.uk

Employ My Ability
Initial Response to a Safeguarding Concern

Revision	Issue Date	Issued by	Page 6 of 23
8	06/10/21	David Fletcher	

3.10. Staff code of conduct

It is essential that all staff, or volunteers, are conscious of how they should conduct themselves to minimise the risk of finding themselves the subject of any allegations.

All staff, or volunteers, should be aware of the following summary of things to do, and not to do, when working with children and vulnerable adults.

Staff must:

- a) Read and follow the safeguarding procedures above.
- b) Work in an open and transparent way.
- c) Discuss and report any incidents of concern or that might lead to concerns being raised about their conduct towards a child or vulnerable adult.
- d) Report to one of the Designated Safeguarding Officer any incidents that suggest a vulnerable adult may be infatuated with, you or taking an unusual interest in them.
- e) Dress appropriately for the role.
- f) Avoid unnecessary physical contact with students.

Staff must not:

- a) Take any action that would lead a reasonable person to question their motivation and/or intentions.
- b) Misuse in any way their position of power and influence over any child or vulnerable adult.
- c) Use any confidential information to intimidate, humiliate or embarrass an child or vulnerable adult.
- d) Establish or seek to establish social contact with a child or vulnerable adult outside of EMA settings.
- e) Accept regular gifts or give personal gifts.
- f) Communicate in with a child or vulnerable adult in an inappropriate way, including via personal emails, social media, text messages and telephone.
- g) Pass on home address, phone number, email address or other personal details to child or vulnerable adult.
- h) Arrange to meet a child or vulnerable adult in closed rooms without other staff being made aware of this in advance.
- i) Use physical punishment of any kind towards a child or vulnerable adult.
- j) Transport a child or vulnerable adult in their own vehicle without prior management approval.
- k) Access abuse images (for example pornography) or other inappropriate material.
- l) Abuse your position of trust with a child or vulnerable adult.
- m) Allow personal boundaries between themselves and a child or vulnerable to be unsafe in more informal settings, such as trips or celebration events.

3.11. Early help

Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help interagency assessment should be arranged. Chapter one of 'Working Together to Safeguard Children' provides detailed guidance on the Early Help process.

Any child may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who:

Revision	Issue Date	Issued by	Page 7 of 23
8	06/10/21	David Fletcher	

- a) is disabled and has specific additional needs.
- b) has special educational needs (whether or not they have a statutory education, health and care plan).
- c) is a young carer.
- d) is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups.
- e) is frequently missing/goes missing from care or from home.
- f) is misusing drugs or alcohol themselves.
- g) is at risk of modern slavery, trafficking or exploitation.
- h) is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse.
- i) has returned home to their family from care.
- j) is showing early signs of abuse and/or neglect.
- k) is at risk of being radicalised or exploited.
- l) is a privately fostered child.

Staff who identify a child or young person in need of early help should report their concern on “MyConcern” or speak to a member of the safeguarding team.

3.12. Information sharing and confidentiality

EMA will ensure that it adheres to robust and timely information sharing protocols with all of the agencies working with children and vulnerable adults. This includes schools, statutory authorities, support services and social services.

Confidentiality and trust should be maintained as far as possible, but all must act on the basis that the safety of the student is the overriding concern. The degree of confidentiality will be governed by the need to protect the child, young person, or vulnerable adult.

The student should be informed at the earliest possible stage of the disclosure that the information will be passed on. All conversations regarding a student should always be held in private and any notes taken will be kept fully confidential and separate from any general client information.

Staff/volunteers must not discuss the case with anyone other than those involved in the case. If staff/volunteers have any concerns about the progress of the case or have any other concerns these must be discussed with the Designated Safeguarding Leads, Operations Director or Managing Director.

The Data Protection Act 1998 and the GDPR allows for disclosures of personal data where this is necessary to protect the vital interests of a child or vulnerable adult. All staff should be made aware that consent to share confidential information should be obtained, unless there is a compelling reason not to do so, for example: a delay in sharing relevant information with appropriate persons or authorities would increase the risk of harm to the child or young person; or asking for consent may increase the risk of harm to the child, young person or anyone else.

3.13. Online safety

EMA has an ICT Acceptable Use Policy to be used in conjunction with this document.

EMA endeavour to both filter and monitor all internet usage within the college in a responsible and transparent way in order to ensure and maintain the safety and security of staff, and students.

Revision	Issue Date	Issued by	Page 8 of 23
8	06/10/21	David Fletcher	

3.14. Wearing of identity badges

In order to assist in EMA providing a safe environment, it is a requirement that all staff wear their staff identity badges at all times (except in circumstances which pose a risk to health and safety e.g. using heavy machinery). Visitors are to visibly wear lanyards provided after signing in at reception.

3.15. Contextual safeguarding and local circumstances

EMA understands that safeguarding concerns can be associated with factors outside the home environment. All staff should be aware of the context that such concerns can occur, including between peers, within the community or online.

Employ My Ability serves the needs of students from a range of backgrounds including high proportions of:

- a) Students from socio-economically deprived areas
- b) High Needs SEND students
- c) Looked After Children and Young Carers
- d) Child on a Child in Need plan or subject to Child Protection Plan

EMA will ensure that all staff have an effective understanding of the local context, and all safeguarding training will acknowledge and reference the local context to ensure that staff are adequately prepared to manage issues that may arise from this.

Furthermore, EMA will provide comprehensive information to local authorities to assist in any social care assessment to enable the wider aims of contextual safeguarding.

3.16. Looked After Children

EMA will work in close collaboration with the Virtual School and Children's Social Services to ensure all Looked After Children (and previously Looked After Children) are identified and offered appropriate support.

3.17. Peer on peer abuse

EMA has a zero-tolerance policy concerning Peer on Peer Abuse and staff are advised that it should never be accepted as "banter", "just having a laugh", "part of growing up", "boys being boys" or similar, as such acceptance can lead to the creation of an unacceptable culture and an unsafe environment.

Nevertheless, EMA makes the assumption that Peer on Peer abuse is happening in the setting, even when there are no specific reports, and that it is more likely that girls will be victims and boys perpetrators.

EMA will seek to minimise instances of Peer-on-Peer abuse by ensuring that:

- a) Staff receive training to recognise the indicators of peer-on-peer abuse and are confident in the knowledge of how to refer cases and support children and vulnerable adults.
- b) The Safeguarding Team works directly with staff, children and vulnerable in a pro-active manner to inform awareness of peer-on-peer abuse and provide guidance and support on how to manage and address it, including the management of so-called 'banter'.
- c) The Safeguarding Team will work closely with staff, students, and parent/carers to ensure that both victims and perpetrators have access to support and guidance.
- d) All cases of peer-on-peer abuse will be recorded on "MyConcern".

Revision	Issue Date	Issued by	Page 9 of 23
8	06/10/21	David Fletcher	

Peer on peer abuse can take a range of different forms including, but not limited to:

- a) Bullying, including cyberbullying.
- b) Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.
- c) Sexual violence, such as rape, assault by penetration and sexual assault.
- d) Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse.
- e) Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- f) Upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm.
- g) Consensual and non-consensual sharing of nude and semi-nude images and/or videos.
- h) initiation/hazing type violence and rituals.

3.18. Children missing from education

EMA completes attendance registers twice per day. Where a student under the age of 18 is expected, but does not attend without reason, or is displaying long-term/regular absences, or other unusual attendance patterns, EMA will ensure that staff follow up with parent/carers, to ensure a full understanding of the reason for absence is gained and recorded.

In cases where a safeguarding concern is known or suspected, the Safeguarding Team will refer to the appropriate authority. All cases will be recorded and monitored using "My Concern".

3.19. Staff training

The Designated Safeguarding Lead and Deputies will be trained in Pan-Dorset SCP Multi-agency Working Together in Safeguarding (formerly known as Level 3 Initial).

All staff will receive adequate training throughout their employment including KCSiE updates, face to face training and e-learning modules to familiarise themselves with safeguarding issues. In addition, all staff receive safeguarding and child protection updates (via email and staff meetings), as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children and young people effectively.

New staff receive 'Safeguarding at induction training' which includes reading and understanding Part One and Annexe A of KCSiE 2021.

3.20. Use of reasonable force

KCSiE 2021 states that there are circumstances when it is appropriate for staff to use reasonable force to safeguard students.

The term '*reasonable force*' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain. This can range from guiding a student to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury.

'*Reasonable*' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between students or blocking a learner's path, or active physical contact such as leading a pupil by the arm out of the classroom.

Revision	Issue Date	Issued by	Page 10 of 23
8	06/10/21	David Fletcher	

Employ My Ability has adopted the Department for Education’s guidance on the use of reasonable force in schools which is made available to all members of staff within the organisation. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/444051/Use_of_reasonable_force_advice_Reviewed_July_2015.pdf

All instances of incidents involving use of reasonable force must be written up in detail on an incident form (SchoolPod), which will then be reviewed by the senior management team.

3.21. Privately fostered children

Private fostering is when a child under the age of 16 (under 18 if they are disabled) is cared for by someone who is not their parent or a ‘close relative’. This is a private arrangement made between a parent and a carer for 28 days or more. Close relatives are defined as step-parents, grandparents, brothers, sisters, uncles or aunts (whether of full blood, half blood or marriage).

To keep children safe and support families, all parents and private foster carers must notify their Local Council. If not, they miss out on essential welfare checks for the children, plus other support services, which include:

- a) Advice on claiming benefits and possible funding for some essential items.
- b) Parenting support and advice.
- c) Help in bringing families in crisis back together.

If EMA knows of a child being privately fostered, EMA will speak to the child’s carer, if details of the arrangement have not been shared with the Local Authority and/or Employ My Ability has reason to believe that information will not be shared by either the parent or carers, we will contact and inform the Children’s Advice & Duty Service.

3.22. Child on child sexual violence and sexual harassment

Any report made of child-on-child sexual violence or sexual harassment will be dealt with seriously and quickly.

When an allegation is made, the Designated Safeguarding Leads will conduct a thorough risk assessment that considers:

- a) the victim, especially their protection and support.
- b) the alleged perpetrator.
- c) all the other children (and, if appropriate vulnerable adults and staff) at EMA, especially any actions that are appropriate to protect them.

This will be recorded and communicated to all staff on a need-to-know basis. Both the victim and (alleged) perpetrator will receive appropriate support from EMA on a case-by-case basis.

3.23. Use of Disclosure and Barring Service

A DBS check provides information about a person’s criminal history, to help organisations determine whether a person is a suitable candidate for a particular position. It forms one part of the wider safeguarding process.

If a position, paid or voluntary, will put an individual in regular unsupervised contact with vulnerable adults, a Disclosure and Barring Service (DBS) check should be undertaken. All key working staff and tutors will have a check undertaken as their job remit means they will be taking part in unsupervised regulated activity.

Revision	Issue Date	Issued by	Page 11 of 23
8	06/10/21	David Fletcher	

The following activities are classed as regulated activity if done regularly (by the same person at least once a week, or on four or more days in a 30-day period): providing advice/guidance on wellbeing, teaching, training, instructing.

As any member of staff or volunteer, could come into contact with a child or vulnerable adult, EMA require that all staff and volunteers undergo a DBS check prior to starting employment.

If a DBS check is not completed prior to commencing employment then that member of staff or volunteer, will not be permitted to undertake any form of lone working with a child or vulnerable adult, and a suitable risk assessment is to be undertaken to reflect this.

If a prospective, new, or existing employee makes a disclosure prior to being checked, the relevance of that disclosure will be assessed against the profile of their likely contact with children or vulnerable adults.

All staff are requested to enrol with the DBS Update Service to enable EMA to request a new check at any point. Furthermore, staff consent to a status check being performed at any time during their employment.

During routine supervisions and annual appraisal processes all members of staff will be asked to confirm that they have not been subjected to any criminal convictions cautions, reprimands or warnings that would give cause for a certificate status change to be registered on the update service.

3.24. Operation Encompass

EMA is part of Operation Encompass. This is a police and education early intervention safeguarding partnership which supports children and young people who experience Domestic Abuse.

Operation Encompass means that the police will share information about Domestic Abuse incidents with EMA soon after they have been called to a domestic incident.

All Key Adults (DSL/DDSL) have attended an Operation Encompass local briefing as well as national online training. Our parents are fully aware that we are an Operation Encompass setting.

The Operation Encompass information is stored in line with all other confidential safeguarding and child protection information.

The Key Adults have also led briefings for all EMA staff and Trustee Advisors about Operation Encompass, the prevalence of Domestic Abuse and the impact of this abuse on children. We have also discussed how we can support our children following the Operation Encompass notification.

The DSL will report on Operation Encompass in the annual report to Trustee Advisors. All information is anonymised for these reports.

The Key Adults have used the Operation Encompass Toolkit to ensure that all appropriate actions have been taken by EMA.

3.25. Preventing extremism and radicalisation

Further to the amendment of the Counter-Terrorism and Security Act (2015), to include the PREVENT Strategy, EMA is committed to providing a secure environment for students, where they feel safe and are kept safe and where equality and inclusion are actively promoted.

Accordingly, EMA defines extremism as:

Revision	Issue Date	Issued by	Page 12 of 23
8	06/10/21	David Fletcher	

'Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs; and/or calls for the death of any person, whether in this country or overseas'

There is no place for extremist views of any kind at EMA, whether from internal sources such as students, staff or trustees; or external sources such as community, external agencies or individuals. Our students see our service as a safe place where they can, at appropriate times, explore controversial issues safely and where our tutors encourage and facilitate this – we have a duty to protect this freedom.

We recognise that extremism and exposure to extremist materials and influences can lead to poor outcomes for students and so should be addressed as a safeguarding concern. We also recognise that if we fail to challenge extremist views we are failing to protect our students.

Extremists of all persuasions aim to develop destructive relationships between different communities by promoting division, fear and mistrust of others based on ignorance or prejudice and thereby limiting the development of learners. Education is a powerful weapon against this; equipping people with the knowledge, skills and critical thinking, to challenge and debate in an informed way and to ensure that they thrive, feel valued and not marginalised.

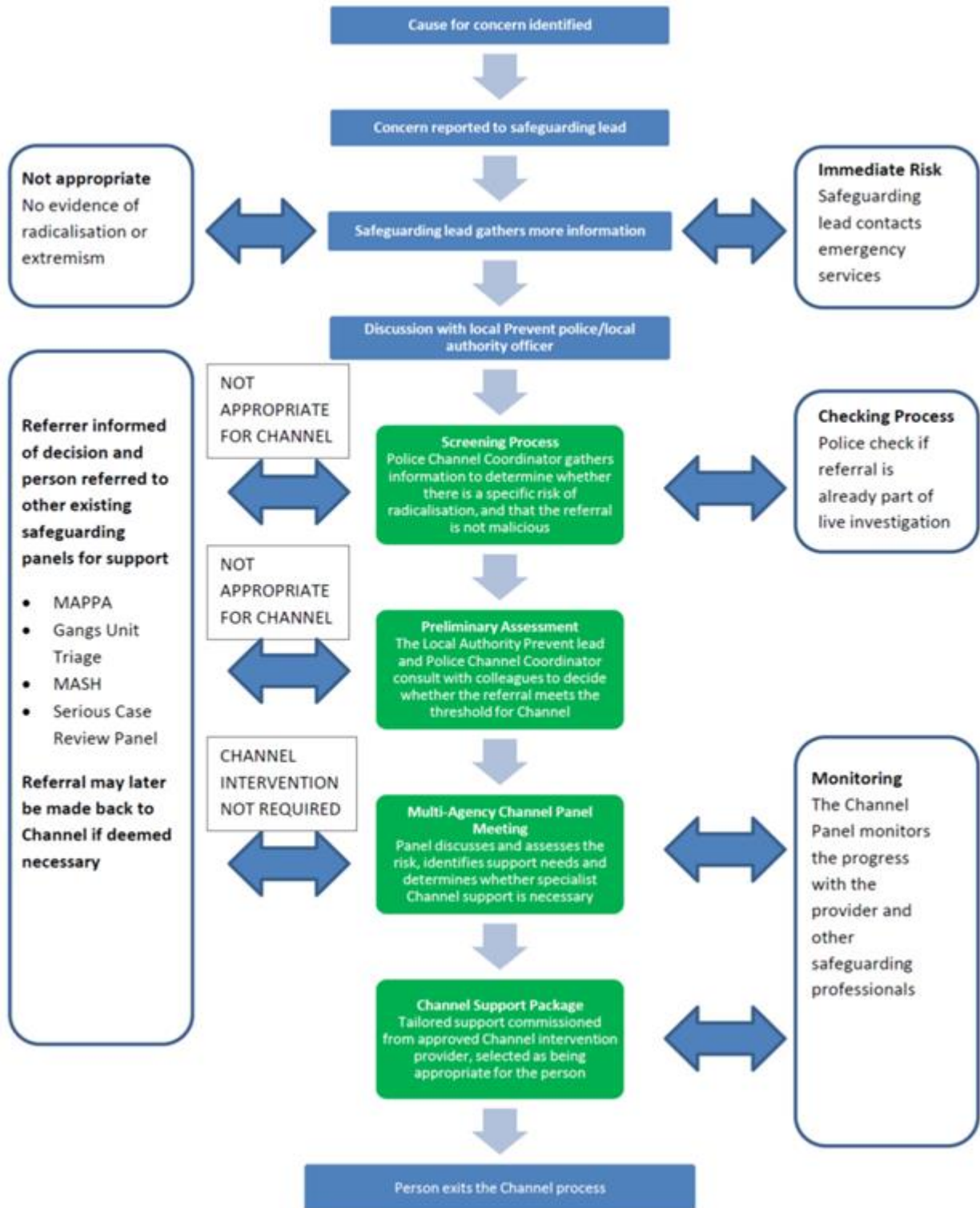
As part of wider safeguarding responsibilities staff will be alert to:

- a) Disclosures by students of their exposure to the extremist actions, views or materials of others outside of the provider, such as in their homes or community groups, especially where learners have not actively sought these out.
- b) Graffiti symbols, writing or art work promoting extremist messages or images.
- c) Students accessing extremist material online, including through social networking sites.
- d) Provider, local authority and police reports of issues affecting learners in other providers or settings.
- e) Learners voicing opinions drawn from extremist ideologies and narratives.
- f) Use of extremist or 'hate' terms to exclude others or incite violence.
- g) Intolerance of difference, whether secular or religious or, in line with our equalities policy, views based on, but not exclusive to, gender, disability, homophobia, race, colour or culture.
- h) Attempts to impose extremist views or practices on others.
- i) Extreme Anti-Western or Anti-British views.

Revision	Issue Date	Issued by	Page 13 of 23
8	06/10/21	David Fletcher	

3.26. Reporting concerns of extremism or radicalisation

Where there are concerns of extremism or radicalisation, they should be reported to the one of EMA's designated safeguarding lead under existing safeguarding and Channel referral procedures (please see Channel Referral Process Flowchart below).



Revision	Issue Date	Issued by	Page 14 of 23
8	06/10/21	David Fletcher	

3.27. Visiting external speakers and events

To comply with the Prevent duty, EMA takes the appropriate measures to ensure that visiting speakers are suitably vetted, safety of our students is not compromised, and security and welfare of students and staff are prioritised.

EMA encourage the use of external/visiting agencies or speakers to enrich the experiences of our students.

EMA will positively vet those external agencies, individuals or visiting speakers, to ensure that we do not unwittingly use agencies or individuals that contradict or are in opposition with EMA's values and ethos, in particular the values of *"democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs"*.

If any member of staff has any concern regarding a venue or event they should contact Jacqui Church – Operations Director (jacqui@employability.org.uk / 01929 405 685 / 07929 019 079), or they should contact the police.

EMA promotes the values of democracy, the rule of law, individual liberty, mutual respect and tolerance for those with different faiths and beliefs. EMA teach and encourage learners to respect one another and to respect and tolerate difference.

EMA will all strive to eradicate the myths and assumptions that can lead to some people becoming alienated and disempowered, especially where the narrow approaches they may experience elsewhere may make it harder for them to challenge or question these radical influences.

In our provision this will be achieved by good practice and excellent teaching. EMA will ensure that all of our teaching approaches help our students build resilience to extremism and give students a positive sense of identity through the development of critical thinking skills.

EMA will:

- a) Make a connection with students through good teaching design and a student-centred approach.
- b) Facilitate a 'safe space' for dialogue.
- c) Equip our students with the appropriate skills, knowledge, understanding and awareness for resilience.

This approach will be embedded within the ethos of our providers so that students know and understand what safe and acceptable behaviour is with regard to extremism and radicalisation.

Our goal is to build mutual respect and understanding and to promote the use of dialogue not violence as a form of conflict resolution.

3.28. Female Genital Mutilation (FGM)

FGM is a collective term for procedures which include the removal of part / all of external female genitalia for cultural or other non-therapeutic reasons. This practice is illegal in England and Wales by the Female Genital Mutilation Act 2003. All College staff are trained to be aware of the risk indicators of FGM.

Our staff have a duty to report to the police cases where they discover that an act of FGM appears to have been carried out on a girl who is aged under 18, either through disclosure or indicators and they have no reason to believe the act was necessary for the girl's physical or mental health or for purposes

Revision	Issue Date	Issued by	Page 15 of 23
8	06/10/21	David Fletcher	

connected with labour or birth, the staff member should personally make a report to the police force in which the girl resides by calling 101. The report should be made immediately.

The duty applies to all persons at Employ My Ability who are employed or engaged to carry out 'teaching work' in the College, whether or not they have qualified teacher status.

The duty also applies to the individual who becomes aware of the case to make a report. It should not be transferred to the Designated Safeguarding Lead, however the DSL should be informed.

The duty does not apply in relation to at risk or suspected cases or in cases where the woman is 18 or over. In these cases, staff should follow local safeguarding procedures.

There are no circumstances in which a tutor or other member of staff should examine a girl.

3.29. County Lines

EMA recognise the Home Office's definition of County Lines as:

"County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of "deal line".

EMA are aware that the children and vulnerable adults who attend an EMA setting in any capacity are particularly at risk from exploitation by County Lines activity, and it is understood that due to the geographic position of EMA settings that this risk is further heightened.

EMA staff and volunteers must be aware of potential indicators of involvement in county lines activity; common signs are listed below:

- a) Persistently going missing from school or home and / or being found out-of-area.
- b) Unexplained acquisition of money, clothes, or mobile phones.
- c) Excessive receipt of texts / phone calls and/or having multiple handsets.
- d) Relationships with controlling / older individuals or groups.
- e) Leaving home / care without explanation.
- f) Suspicion of physical assault / unexplained injuries.
- g) Parental concerns.
- h) Carrying weapons.
- i) Significant decline in school results / performance.
- j) Gang association or isolation from peers or social networks.
- k) Self-harm or significant changes in emotional well-being.

EMA staff and volunteers have the following responsibilities when responding to concerns about County Lines exploitation:

- a) If there is an immediate risk of danger to the child, or vulnerable adult, the Police should be called.
- b) If there is not an immediate risk of danger to the child, or vulnerable adult, but a concern is identified, then staff are to follow the reporting procedures contained elsewhere in this policy by reporting the concern to the Designated Safeguarding Lead.

EMA will provide initial induction training, followed by periodic training to all staff, about County Lines. County Lines activity is a form of Child Criminal Exploitation

Revision	Issue Date	Issued by	Page 16 of 23
8	06/10/21	David Fletcher	

3.30. Child Criminal Exploitation (CCE)

EMA recognises that Child Criminal Exploitation (CCE) is a form of abuse.

It is broadly defined as when an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online.

The following are indicators of CCE; a child:

- a) Appearing with unexplained gifts or new possessions.
- b) Associating with other young people involved in exploitation.
- c) Suffering from changes in emotional wellbeing.
- d) Misusing drugs and alcohol.
- e) Going missing for periods of time or regularly coming home late.
- f) Regularly missing school or education.
- g) Not taking part in education.

If a member of staff suspects a child is becoming a victim of CCE, it must be discussed with EMA's Designated Safeguarding Lead, and raised through "My Concern". The DSL may make a referral to the local authority's children's social care team and the police, if appropriate.

3.31. Child Sexual Exploitation (CSE)

EMA recognises that this is a form of child sexual abuse.

It is when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam.

CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

Revision	Issue Date	Issued by	Page 17 of 23
8	06/10/21	David Fletcher	

In addition to the CCE indicators above, the following are indicators of CSE; a child:

- a) Having an older boyfriend or girlfriend.
- b) Suffering from sexually transmitted infections or becoming pregnant.

If a member of staff suspects a child is becoming a victim of CSE, it must be discussed with EMA's Designated Safeguarding Lead, and raised through "My Concern". The DSL may make a referral to the local authority's children's social care team and the police, if appropriate.

3.32. Serious Violence

A child may be at risk from, or involved with serious violent crime if there is:

- a) Increased absence from school.
- b) Change in friendships or relationships with older individuals or groups.
- c) Significant decline in performance.
- d) Signs of self-harm or a significant change in wellbeing.
- e) Signs of assault or unexplained injuries.
- f) Unexplained gifts or new possessions.
 - i. This could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs, and may be at risk of CCE.

Risk factors which increase the likelihood of involvement in serious violence include:

- a) Being male.
- b) Having been frequently absent or permanently excluded from school.
- c) Having experienced child maltreatment.
- d) Having been involved in offending, such as theft or robbery.

If a member of staff suspects a child is being involved with serious violent crime, it must be discussed with EMA's Designated Safeguarding Lead, and raised through "My Concern". The DSL may make a referral to the local authority's children's social care team and the police, if appropriate.

3.33. Use of school or college premises for non-school/college activities

EMA does not permit the use of its college premisses for non-school/college activities.

Revision	Issue Date	Issued by	Page 18 of 23
8	06/10/21	David Fletcher	

4. Roles & responsibilities

4.1. Appointment of Designated Safeguarding Leads

EMA will appointment a primary and deputy DSL for each setting where services are delivered, at the current time those appointments are:

Name	Location	Role	Contact
Hayley Fairbairn ²	Moreton	DSL	01929 507070 hfairbairn@employmyability.org.uk
Jo Russell ²	Thorngrove	DSL	01929 508003 jrussell@employmyability.org.uk
Craig Hutton	Adult Social Care	DSL	01929 507079 craig.hutton@employmyability.org.uk
James Dunham ^{1,2}	All areas	Deputy DSL	01929 507072 jdunham@employmyability.org.uk
Sammie Eaton ²	All areas	Deputy DSL	01929 507063 sammie@employmyability.org.uk

¹Also Designated Teacher for Looked After Children

²Also a Key Adult for Operation Encompass

4.2. SMT

To ensure that the policy is kept up to date as per relevant regulatory changes. To identify training in relation to safeguarding strategy, and to ensure that sufficient resources are in place to enable the effective implementation and execution of the safeguarding framework and mechanisms.

SMT will direct external referral actions to the Disclosure and Barring Service (DBS) if a staff member in a regulated activity is dismissed or removed due to safeguarding concerns or would have been had they not resigned.

In the instance of a substantiated case of serious misconduct the SMT will consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).

4.3. Designated Safeguarding Lead

The designated safeguarding lead will take lead responsibility for safeguarding and child protection (including online safety).

The specific areas in relation to EMA are contained within the DSL's job description, an outline of these are included in Section 3 of this policy.

EMA will ensure that the DSL is given the appropriate status and authority within our settings to carry out the duties of the post; They will be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part

Revision	Issue Date	Issued by	Page 19 of 23
8	06/10/21	David Fletcher	

in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children.

4.4. Teaching staff

Teaching staff are required to implement the overall ethos of this policy which can be evidenced through various planning documents used in the teaching delivery. They should all know how to identify children at risk, follow the procedures contained in this policy, and proactively promote the values of inclusion and respect in both the classroom and in the practical work context.

Teaching staff are required to be aware of the training and curriculum support/development tools provided by the UK Government, which can be found here: <https://www.gov.uk/guidance/teaching-about-relationships-sex-and-health>

4.5. All staff

As a minimum, all staff should be aware of this policy, receive training on its practical implementation and be able to follow the correct procedures to report a concern, which includes reacting as accordingly if a disclosure is made to them. In addition, all staff are to be provided with access to a copy of *Annex A: Safeguarding information for school and college staff*, from *Keeping Children Safe in Education 2021 (September 2021)*.

4.6. Advisory Trustee Board

All Advisory Trustees must assist EMA to meet its statutory responsibilities with regard to safeguarding, and provide when necessary, challenge to the SMT if they perceive there are any shortfalls in the safeguarding provision in any setting across EMA operates.

One Advisory Trustee will be nominated to lead on safeguarding on behalf of the other board members.

5. Implementation

The Senior Management Team at EMA have overall responsibility for the implementation of this policy; however, all employees are required to adhere to and support its implementation.

All employees are to be made aware of any changes to this policy.

6. Support, advice, and communications

Requests for further advice, support or implementation guidance on this policy can be obtained from the EMA Safeguarding Team, their normal hours of operation are Monday to Friday from 0845 to 1645; however safeguarding@employability.org.uk is periodically checked outside of the hours, but a response is not guaranteed.

EMA's duty of care for safeguarding can only be executed whilst a child or vulnerable adult is within one of EMA's settings for the duration of their contracted provision.

Revision	Issue Date	Issued by	Page 20 of 23
8	06/10/21	David Fletcher	

Therefore, should a concern need to be reported outside of the above hours, it should be addressed to the relevant local authority detailed below.

6.1. Key internal and external contacts

Please note that EMA will only respond to safeguarding concerns and queries between the hours of 0845 and 1645. Outside of these times please contact the appropriate local authority contact for report a safeguarding concern.

a) Internal contacts

EMA Safeguarding Team	Will connect to Moreton reception; ask to speak to a member of the safeguarding team.
01929 405 685 safeguarding@employability.org.uk	
Hayley Fairbairn	Designated Safeguarding Lead for Moreton
01929 405 685 hfairbairn@employability.org.uk	
Joanne Russell	Designated Safeguarding Lead for Thorngrove
01929 405 685 jrussell@employability.org.uk	
Craig Hutton	Designated Safeguarding Lead for Adult Social Care
01929 405 685 craig.hutton@employability.org.uk	
Sammie Eaton	Deputy Designated Safeguarding Lead for all areas
01929 405 685 sammie@employability.org.uk	
James Dunham	Deputy Designated Safeguarding Lead for all areas
01929 405 685 jdunham@employability.org.uk	
Jacqui Church	Operations Director
01929 405 685 jacqui@employability.org.uk	
Steve White	Managing Director
01929 405 685 steve@employability.org.uk	

b) External contacts

Bournemouth, Christchurch & Poole Children's First Response Hub	Duty Officer
01202 123 334 childrensfirstresponse@bcpcouncil.gov.uk	
Children's Advice & Duty Service	Duty Officer - Professionals only number to discuss concerns
01305 228 558	
Dorset Families and Members of the Public	Duty Officer contact for families and members of the public to report a safeguarding concern out of hours
01305 228 866	
BCP Children's Out of hours	Hours of operation are 1700 to 0900 from Monday to Friday, all day Saturdays and
01202 738 256 childrensOOSH@bcpcouncil.gov.uk	

Revision	Issue Date	Issued by	Page 21 of 23
8	06/10/21	David Fletcher	

	Sundays and all bank holidays, including Christmas Day and New Year's Day.
Dorset Children's Out of Hours Service 01305 228 558	Duty Officer
Adult Safeguarding, Dorset Council Area 01929 557 712 dorsetadultsafeguarding@dorsetcouncil.gov.uk	Duty Officer
Adult Safeguarding, Bournemouth, Christchurch and Poole Areas 01202 123 654 asc.contactcentre@bcpcouncil.gov.uk	Duty Officer
Adult Safeguarding, All Dorset / BCP Areas, Evenings / Weekends / Bank Holidays 0300 1239 895	Out of Hours Duty Officer
Ann Shaw 01305 221 191 ann.shaw@dorsetcouncil.gov.uk	Dorset County LADO
Wiltshire Multi-Agency Safeguarding Hub 0300 456 0108	0845 - 1700 Monday - Thursday 0845 - 1600 Friday
Wiltshire Multi-Agency Safeguarding Hub 0300 456 0100	Emergency Duty Service 1700 - 0845
Hampshire County Council 0300 555 1384	0830 – 1700 Monday to Friday
Hampshire County Council 0300 555 1373	Out of Hours Duty Officer
Somerset County Council 0300 123 2224	Duty Officer
Somerset County Council 0300 123 23 27	Emergency Duty Team out of hours contact

7. Review

This policy will be reviewed annually, following which the revision number and date will be updated to ensure that staff always know that they are referencing the correct policy.

Revision	Issue Date	Issued by	Page 22 of 23
8	06/10/21	David Fletcher	

Should there be a need to change the content of the policy before its annual review date then please send a notification to compliance@employability.org.uk

8. Associated documents

Behaviour Policy

Safer Recruitment Policy

EMA Whistleblowing Policy

ICT Acceptable use Policy

Revision	Issue Date	Issued by	Page 23 of 23
8	06/10/21	David Fletcher	