Safeguarding & Child Protection Policy

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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 (as amended)
m) Data Protection Act (2018)
n) Keeping Children Safe in Education (as amended)
o) Pan-Dorset Safeguarding Children Partnership
p) HMG's Factual Note: Regulated Activity in Relation to Children (Scope) 2012
q) Police & Criminal Evidence Act (1984)

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, non-executive directors , staff (full time, part time, permanent, temporary, or sessional), students, agency staff and volunteers.

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 among the most vulnerable members of society, and their safety and wellbeing are 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 and promote the welfare of those individuals we work with.

Safeguarding and promoting the welfare of children means protecting children from maltreatment, preventing impairment of children's mental and physical health or development, to help ensure that children grow up in circumstances consistent with the provision of safe and effective caretaking action to enable all children to have the best outcomes.

EMA adopts a child-centred approach and staff must maintain an attitude of 'it could happen here' where safeguarding is concerned, by always acting in the best interests of the child.

We recognise that abuse, neglect, exploitation and harm can occur in person or online and that online safety is an integral part of safeguarding.

EMA also recognises that child-on-child abuse can occur in any setting and may include bullying, cyberbullying, sexual violence, sexual harassment, coercive and controlling behaviour, exploitation, emotional abuse and other harmful behaviours. Such abuse will never be tolerated, dismissed as banter, part of growing up, or accepted as normal behaviour.

Staff should be alert to indicators that a child may benefit from early help and take prompt action to ensure concerns are identified and addressed at the earliest possible stage. Effective safeguarding requires partnership working with children, young people, parents, carers and relevant agencies to promote welfare and protect those at risk from harm.

3.2. Referrals and Transitions

EMA recognises the importance of effective information sharing when a student moves to, or from another education, training or care provision. Safeguarding concerns do not end when a student leaves a setting, and appropriate arrangements must be made to support a safe transition.

When a student transfers to EMA from another provision, the DSL will seek relevant safeguarding information from the previous setting and, where appropriate, engage in direct DSL-to-DSL discussion to ensure that any safeguarding concerns, vulnerabilities or support needs are effectively understood and managed.

Similarly, when a student transfers out to another provision, the DSL will ensure that relevant safeguarding information is shared with the receiving setting in a timely and secure manner.

Safeguarding information may include child protection records, ongoing safeguarding concerns, risk assessments, Early Help or Family Help involvement, attendance concerns, mental health considerations, and any other information necessary to safeguard and promote the student's welfare.

Where appropriate, the DSL will seek direct professional dialogue with the other provision's DSL or safeguarding lead to ensure that safeguarding information is understood, any ongoing risks are clearly communicated, and arrangements are in place to support the student following transition. A record of information shared, and discussions held will be maintained.

EMA will work cooperatively with other agencies and settings to ensure continuity of safeguarding support and to minimise the risk of information being lost or overlooked during transition. Further details can be found in the Referrals and Transitions Policy

3.3. Early Intervention, Respectful Behaviour and the Prevention of Prejudice

EMA is committed to creating a safe, inclusive and respectful environment in which all learners are valued and protected from harm, and recognises the importance of early intervention in safeguarding and the need to identify and respond to concerns before they escalate. All staff have a responsibility to remain vigilant, exercise professional curiosity and report concerns at the earliest opportunity so that appropriate support can be provided to learners and their families.

EMA recognises that harmful attitudes and behaviours can develop gradually and, if unchallenged, may contribute to bullying, discrimination, harassment, child-on-child abuse, sexual harassment, misogyny, violence, extremism or other forms of abuse. Staff will therefore take a proactive approach to promoting respect, inclusion and positive relationships throughout the college community.

EMA will not tolerate the use of prejudicial, discriminatory, hateful or derogatory language relating to a person's protected characteristics, background, identity, disability, sex, race, religion or belief, sexual orientation, gender reassignment or any other characteristic. Staff are expected to challenge inappropriate language, stereotypes, discriminatory attitudes and disrespectful behaviour consistently and proportionately, recognising that failing to do so may contribute to the normalisation of prejudice and abuse.

Where incidents occur, staff will consider the context, the needs of those involved and any safeguarding concerns that may be present. Concerns will be recorded and reported in accordance with safeguarding, behaviour and anti-bullying procedures. Where appropriate, support, education and restorative approaches will be used alongside any necessary disciplinary action to promote understanding, accountability and positive behavioural change.

EMA recognises the increased emphasis needed on preventing harmful behaviours, including sexual harassment, sexual violence, misogyny and violence against women and girls (VAWG). EMA will promote a culture where inappropriate behaviour is challenged, concerns are taken seriously, and students feel safe to report incidents without fear of being ignored or dismissed.

Through education, pastoral support, safeguarding procedures and positive role modelling, EMA will work to ensure that respectful behaviour is the norm, prejudice is actively challenged, and learners are supported to develop the knowledge, skills and values required to participate safely and positively in modern society.

3.4. 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.

3.5. Policy for Guidance & Training

EMA follow government and local guidance for safeguarding and PREVENT training; the breadth and content of this training is to be specific to job roles.

3.6. Local Authority Safeguarding Children Partnerships

Under the requirements of Working Together to Safeguard Children (as amended), 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 (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.

3.7. Designated Safeguarding Leads (DSL) responsibilities

The Designated Safeguarding Lead (DSL) has lead responsibility for safeguarding and child protection, including online safety. The DSL will:

a) Ensure this policy and associated safeguarding procedures are implemented, reviewed regularly (at least annually or in response to a significant event, or regulatory change) and adhered to throughout EMA.
b) Provide advice, guidance and support to staff, students, agency staff and volunteers regarding safeguarding concerns, including concerns relating to children, young people and adults at risk, and ensure appropriate action is taken.
c) Act as the main point of contact for safeguarding matters and make referrals to Children's Social Care, Adult Social Care, the Police, the Local Authority Designated Officer (LADO), Channel, Prevent and other relevant agencies as appropriate.
d) Maintain effective working relationships and information sharing arrangements with the Pan-Dorset Safeguarding Children Partnership, safeguarding partners and other relevant agencies.
e) Ensure safeguarding records are accurate, confidential, secure, and maintained in accordance with statutory requirements and data protection legislation.
f) Promote a culture of safeguarding throughout EMA, ensuring that all staff receive appropriate safeguarding and child protection information, training and updates.
g) Ensure that learners receive appropriate safeguarding education, including online safety, and that safeguarding concerns are identified, monitored and responded to effectively.
h) Maintain ownership of the Single Central Record and ensure all required safeguarding and safer recruitment checks are completed, recorded and monitored in accordance with statutory guidance and the EMA Safer Recruitment Policy.
i) Work with senior leaders to ensure safeguarding arrangements, policies and procedures remain effective and compliant with current legislation and statutory guidance.

3.8. Procedure for acting on concerns from a child or vulnerable adult

It is the responsibility of all staff (not just those specifically working with vulnerable adults) and volunteers working at EMA to recognise, record and report safeguarding concerns.

EMA defines a safeguarding concern as:

"Any indication that a child or vulnerable adult may be suffering, or is at risk of suffering, abuse, neglect, exploitation, significant harm, or may otherwise require early help, support or protection."

Staff must act immediately on any safeguarding concern and must never assume that someone else will take responsibility for reporting it.

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited or neglected and/or may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, fearful, threatened or unable to communicate what is happening to them. This may be due to their age, vulnerability, disability, communication needs, sexual orientation, cultural background or language barriers.

This should not prevent staff from maintaining professional curiosity, respectfully exploring concerns rather than accepting explanations at face value, and speaking to the Designated Safeguarding Lead (DSL) if they have any concerns about a child or vulnerable adult. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication and disclosure.

Staff should be aware that learners may not identify their experiences as abusive, particularly where behaviours are emotional, psychological, coercive, controlling or exploitative in nature, or presented as part of a relationship. This applies equally to learners over the age of 18. A learner's age, apparent consent, or relationship status must not prevent concerns being raised with the Designated Safeguarding Lead.

Staff should be alert to children and vulnerable adults who may benefit from early help and take prompt action where concerns arise, ensuring that individuals receive the right help at the right time.

3.9. Procedure for acting on concerns about an adult's behaviour

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) Record the concern in accordance with EMA's safeguarding procedures.
d) Under no circumstances confront the adult or try to investigate the matter themselves.

All concerns will be treated confidentially and shared only on a need-to-know basis in order to safeguard the child or vulnerable adult concerned.

3.10. Procedure for dealing with concerning behaviour from an employee or volunteer

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 Education Director, or Managing Director.
b) Record the concern in accordance with EMA's safeguarding procedures.
c) not confront the adult in question.

Should your concern be regarding the behaviour of the Designated Safeguarding Lead, it should be sent to the Education Director or Managing Director.

Should your concern be regarding the behaviour of the Education Director, it should be sent to the Managing Director.

Should your concern be regarding the behaviour of the Managing Director, it should be sent to the Education Director.

Allegations made against either the Managing Director, or Education & Operations Director will be investigated by the director who has not been implicated in the allegation, and a member of EMA's non-executive board will provide an impartial review of the investigation prior to it being finalised.

Should both directors be implicated, advice will be sought immediately from the Local Authority Designated Officer (LADO), Local Authority safeguarding team, police and/or other relevant safeguarding agencies as appropriate.

EMA will endeavour to ensure that the member of staff or volunteer is treated fairly and honestly, helped to understand the concerns expressed, the processes being followed and any outcomes whilst ensuring that the safety and welfare of children and vulnerable adults remain paramount.

Consideration will be given to the seriousness of the concern or allegation before informing the person concerned. In circumstances where criminal behaviour may have occurred, or where a child or vulnerable adult may be at immediate risk, the police and/or other appropriate authorities will be involved without delay.

Allegations that may meet the harm threshold

EMA recognises the distinction between allegations that may meet the harm threshold and low-level concerns that do not meet the harm threshold but may indicate behaviour inconsistent with the Staff Code of Conduct.

A concern or allegation may meet the harm threshold where an adult has:

a) Behaved in a way that has harmed a child or vulnerable adult, or may have harmed a child or vulnerable adult.
b) Possibly committed a criminal offence against or related to a child or vulnerable adult.
c) Behaved towards a child or vulnerable adult in a way that indicates they may pose a risk of harm.
d) Behaved or may have behaved in a way that indicates they may not be suitable to work with children, young people or vulnerable adults.

Where a concern or allegation may meet the harm threshold, EMA will seek advice from the Local Authority Designated Officer (LADO) before undertaking any investigation, except where immediate action is required to safeguard a child or vulnerable adult.

Low-level concerns

EMA requires all staff to be aware that low-level concerns, no matter how small, must be shared and recorded.

A low-level concern is any concern that an adult's behaviour may be inconsistent with the Staff Code of Conduct, including conduct both inside and outside of work. Examples of low-level concerns include, but are not limited to:

a) Being overly friendly with children or vulnerable adults.
b) Having favourites.

c) Seeking unnecessary one-to-one contact.
d) Engaging with a child or vulnerable adult alone in secluded areas or behind closed doors without justification.
e) Taking photographs of children or vulnerable adults on personal devices without authorisation.
f) Using inappropriate, sexualised, intimidating, humiliating or offensive language.
g) Communicating through unauthorised personal social media or messaging platforms.
h) Working in a manner that is inconsistent with EMA policies and professional boundaries.
i) Inappropriate conduct outside of work that may impact an individual's suitability to work with children or vulnerable adults.

Any staff behaviour that appears to challenge professional boundaries or deviates from the Staff Code of Conduct must be reported to the Designated Safeguarding Lead. All such concerns will be documented to identify patterns of behaviour, prevent escalation and ensure early intervention where required.

Staff are encouraged to self-report any incident or circumstance that may reasonably be regarded as a low-level concern or which could be misinterpreted by others.

Staff should also refer to the EMA Whistleblowing Policy, which sets out how serious concerns, including those relating to safeguarding practices, can be raised.

All such concerns will be recorded on EMA's chosen management information system.

Referrals to the Disclosure and Barring Service (DBS)

EMA recognises its legal duty to refer individuals to the Disclosure and Barring Service (DBS) where they have been removed from regulated activity, dismissed, redeployed, resigned before dismissal, or would otherwise have been removed from regulated activity because they harmed, or posed a risk of harm to, a child or vulnerable adult.

Where appropriate, EMA will also make referrals to relevant professional regulatory bodies.

This duty to refer overrides any obligation to withhold information on the grounds of confidentiality.

As outlined within EMA's Disciplinary and Investigation Procedures, EMA reserves the right to suspend a member of staff from duties and/or sites while safeguarding investigations are undertaken.

3.11. 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 experiencing abuse, neglect, exploitation, sexual violence, sexual harassment, domestic abuse, coercive or controlling behaviour, or any other safeguarding concern, they must respond calmly, sensitively and appropriately. The member of staff or volunteer will:

a) Believe what the individual is saying and take the disclosure seriously.
b) Remain calm, listen carefully and provide a safe space for the individual to speak.
c) Reassure them that they have done the right thing by speaking up, that they are not to blame, have not created a problem, and that they will be supported and kept safe.
d) Give them time to talk and do not interrupt, probe, investigate or ask leading questions. Clarification should only be sought where absolutely necessary to establish whether there is an immediate risk of harm. Investigation is not the responsibility of staff or volunteers.

e) Not make promises of confidentiality or secrecy. Staff must explain that the information will only be shared with those who need to know in order to help keep them safe and fulfil safeguarding responsibilities.
f) Explain that the information will be shared with the EMA Safeguarding Team, who will determine what action needs to be taken and ensure that appropriate safeguarding procedures are followed.
g) Be mindful that some individuals, particularly those with SEND, communication difficulties, learning disabilities, previous trauma, mental health needs, or language barriers, may require additional support or different approaches to help them communicate.
h) Ensure that a victim reporting abuse, sexual violence, sexual harassment, exploitation or any other safeguarding concern is never made to feel that they are creating a problem, exaggerating concerns, wasting time, or should feel ashamed for making the report.
i) Make no assumptions about what has happened and avoid expressing shock, disbelief, judgement or personal opinions.
j) Record the disclosure as soon as possible while the information is fresh in their mind.
    - Records should be accurate, factual and objective, using the individual's own words wherever possible, distinguishing clearly between facts, observations and professional opinion. Dates, times, locations, witnesses and actions taken where relevant must also be recorded.
k) Ensure that the disclosure is recorded on EMA's current Safeguarding platform reported directly to one of EMA's Designated Safeguarding Leads without delay.
l) Where an individual is believed to be at immediate risk of harm, take immediate action to secure their safety, including contacting a Designated Safeguarding Lead, emergency services, or other appropriate agencies without delay.

The Designated Safeguarding Lead (DSL), or their deputy, will be responsible for ensuring that essential information is recorded, safeguarding records are maintained securely, and that any referrals are made to appropriate agencies where required.

Information relating to safeguarding concerns will be shared strictly on a need-to-know basis. Detailed information regarding a case will normally be confined to the Safeguarding Team, Education Director and Managing Director. Where referrals to external agencies are required, relevant information will be shared in accordance with safeguarding, data protection and information-sharing requirements.

Staff and volunteers who raise safeguarding concerns will be informed of outcomes and progress where appropriate and on a need-to-know basis, whilst maintaining confidentiality and protecting the rights of those involved.

Where a safeguarding report or allegation is determined to be unsubstantiated, unfounded, false or malicious, the Designated Safeguarding Lead will consider whether the child, young person, vulnerable adult, or reporting individual may nevertheless require additional help, support or protection. Consideration will be given as to whether the report may be indicative of abuse, exploitation, unmet need, mental health concerns, or another safeguarding issue requiring further assessment or referral.

For cases that are concluded to be unsubstantiated, unfounded, false or malicious, the Designated Safeguarding Lead will review the circumstances of the case and determine whether any lessons can be learned, whether procedures were followed appropriately, and whether any improvements to policy, practice or training are required.

Where a report is found to have been deliberately fabricated or made maliciously, EMA will consider whether any further action is required. Any response will take account of the individual's age, understanding, vulnerabilities, additional needs and circumstances, and will be managed in accordance with EMA's Behaviour Policy, Disciplinary Procedures and safeguarding responsibilities.

EMA recognises that the welfare of the child, young person or vulnerable adult is paramount and that all disclosures must be taken seriously, responded to promptly, and managed in a manner that prioritises safety, support and protection.

3.12. Management of reported concerns and disclosures

All safeguarding concerns and disclosures will be taken seriously and responded to promptly. The Designated Safeguarding Lead (DSL), or a Deputy DSL in their absence, will assess the information received, consider the wishes and feelings of the child where appropriate, and determine the most suitable course of action. Decisions, actions taken and the rationale for those decisions will be clearly recorded.

Depending on the nature and level of concern, actions may include:

a) Seeking further advice from Children's Social Care, Adult Social Care, the Local Authority Designated Officer (LADO), the Police, health professionals, or other relevant safeguarding agencies.
b) Providing or coordinating early help where a child or family would benefit from additional support.
c) Making a referral to Children's Social Care, Adult Social Care, the Police, Channel/Prevent, or another statutory agency as appropriate.
d) Liaising with an allocated Social Worker or other lead professional where one is already involved.
e) Taking immediate action where a child, young person or vulnerable adult is believed to be at risk of significant harm or in immediate danger.

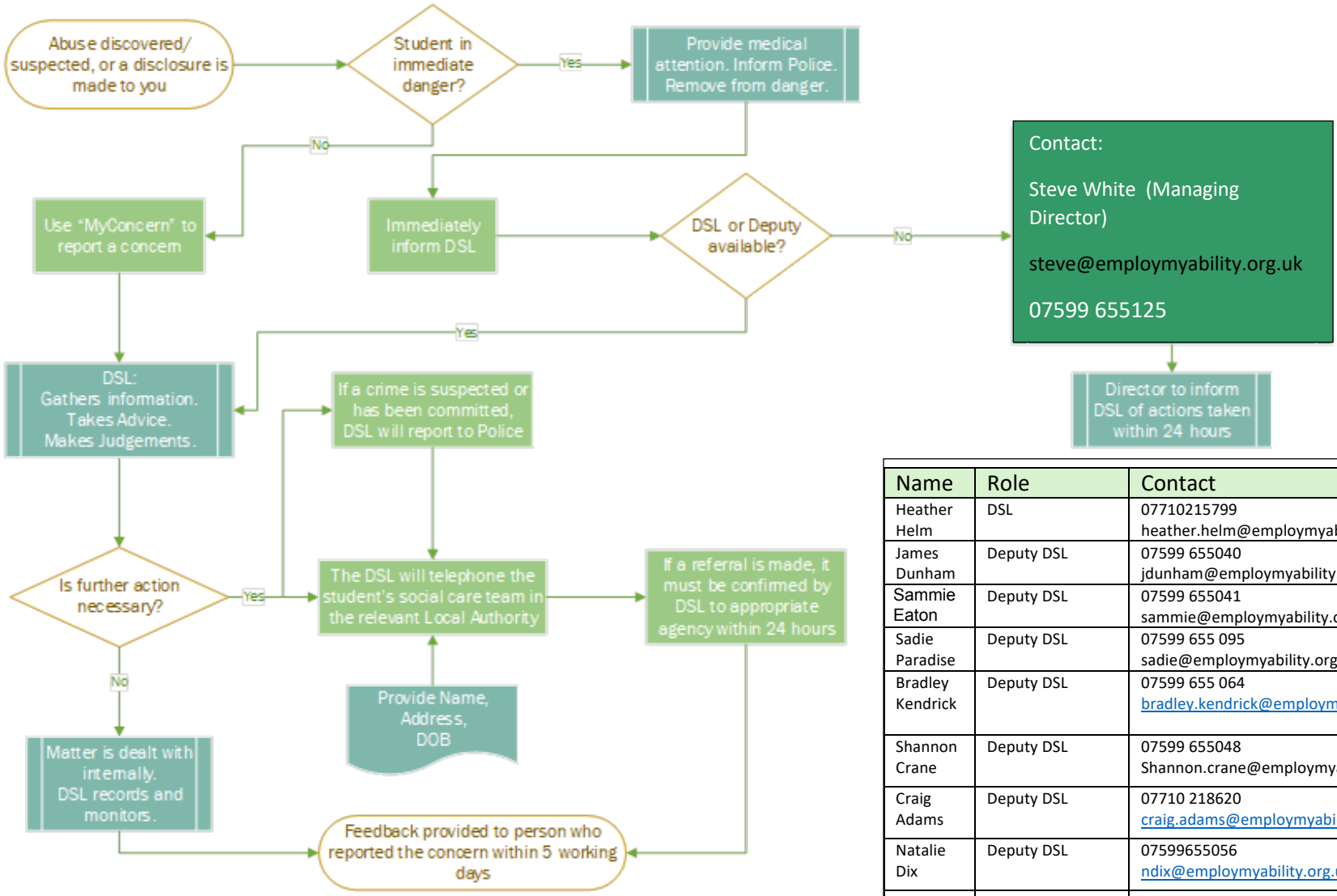
Where a referral is made, it will be made without delay and confirmed in writing in accordance with local safeguarding partnership procedures where required.

EMA will comply with all current statutory reporting and notification requirements, including those relating to the Education and Skills Funding Agency (ESFA), Ofsted, the Local Authority Designated Officer (LADO), safeguarding partners, the Disclosure and Barring Service (DBS), the Teaching Regulation Agency (TRA), Prevent/Channel and other relevant agencies, as applicable.

Any member of staff, volunteer, contractor or agency worker who disagrees with a safeguarding decision has the right and responsibility to escalate their concerns, including making a referral directly to Children's Social Care, Adult Social Care, the Police, or other relevant agency if they believe a child, young person or vulnerable adult remains at risk.

EMA recognises that safeguarding incidents may have a wider impact on those involved. The DSL will consider what additional support may be required for children, young people, vulnerable adults, families, carers, staff or volunteers affected by a safeguarding concern and will arrange appropriate support, counselling or signposting services where necessary.

3.13. Initial response to a Safeguarding Concern



Name	Role	Contact
Heather Helm	DSL	07710215799 heather.helm@employmyability.org.uk
James Dunham	Deputy DSL	07599 655040 jdunham@employmyability.org.uk
Sammie Eaton	Deputy DSL	07599 655041 sammie@employmyability.org.uk
Sadie Paradise	Deputy DSL	07599 655 095 sadie@employmyability.org.uk
Bradley Kendrick	Deputy DSL	07599 655 064 bradley.kendrick@employmyability.org.uk
Shannon Crane	Deputy DSL	07599 655048 Shannon.crane@employmyability.org.uk
Craig Adams	Deputy DSL	07710 218620 craig.adams@employmyability.org.uk
Natalie Dix	Deputy DSL	07599655056 ndix@employmyability.org.uk
Sarah Sellers	Deputy DSL	07599655146 Sarah.seller@employmyability.org.uk

3.14. Escalation of Safeguarding Concerns

To ensure that all safeguarding concerns are managed effectively and without delay, EMA requires all staff to follow the escalation process outlined below.

Internal escalation

All safeguarding concerns, disclosures, allegations, incidents or suspicions of abuse, neglect, exploitation or harm must be reported immediately to a Designated Safeguarding Lead (DSL) or Deputy DSL.

If the concern relates to a member of the Safeguarding Team, staff must report directly to either the Managing Director or Education Director.

If the concern relates to the Designated Safeguarding Lead, staff must report directly to either the Education Director or the Managing Director.

If a DSL is not available, staff must:

a) Speak to any available member of the Safeguarding Team, OR
b) Contact local authority children's social care directly using the contacts in Section 6.1
c) Contact the police where a criminal offence is suspected or immediate safeguarding intervention is required.

Staff must not delay reporting if a DSL is not immediately available. Where there is concern that a child or vulnerable adult may be suffering or likely to suffer significant harm, any member of staff may make a referral directly to Children's Social Care if they believe appropriate action is not being taken or if delay could place the individual at risk.

If there is an Immediate risk of harm, and a child or vulnerable is in immediate danger, staff must:

a) Contact emergency services (999) immediately
b) Take reasonable steps to secure the immediate safety of the individual where it is safe to do so.
c) Then inform the DSL as soon as possible

The immediate safety and welfare of the individual must always take precedence over internal reporting procedures.

External escalation

The DSL, Deputy DSL or other authorised safeguarding representative will escalate concerns externally where:

a) A child is at risk of significant harm
b) A criminal offence may have been committed
c) Early help is insufficient to manage risk
d) Specialist assessment, intervention or protection services are required.
e) There are concerns about staff conduct (via LADO)
f) There are concerns relating to radicalisation, extremism or terrorism.

This may include escalation to:

a) Children's Social Care
b) Adult Social Care

c) Police
d) Local Authority Designated Officer (LADO)
e) Prevent / Channel Panel
f) Health or Mental Health Services

Professional challenge and escalation

EMA recognises that effective safeguarding relies upon constructive professional challenge.

If a member of staff feels that:

a) A concern has not been taken seriously, OR
b) Appropriate action has not been taken
c) A decision places a child or vulnerable adult at continued risk, or
d) d) An external agency response is inadequate

They have a professional responsibility to challenge that decision and escalate the matter further, which may involve:

a) Re-reporting to a more senior member of staff, OR
b) Contacting the Local Authority directly to refer or seek advice from, OR
c) Use EMA's Whistleblowing Policy where appropriate

Staff must not close a concern until satisfied it has been appropriately addressed

Recording escalation

All escalation actions must be:

a) Recorded on MyConcern
b) Include dates, times, decisions, and rationale
c) Include details of any external referrals, consultations or professional discussions

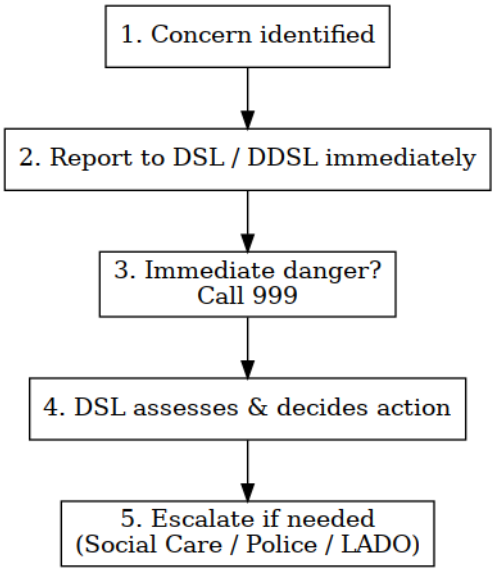
Timescales

All concerns must be reported on the same working day, and urgent concerns must be escalated immediately.

Where the concern presents an immediate risk of harm, escalation must occur immediately and without delay.

Safeguarding referrals to external agencies must be made as soon as the threshold for referral is met, or where immediate intervention is required to safeguard a child, young person or vulnerable adult.

EMA recognises that delays in safeguarding responses can increase risk and therefore expects all staff, volunteers and managers to prioritise safeguarding concerns above all other operational considerations.



3.15. 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 Leads 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.
g) Abide by the IT Acceptable Use Policy.
h) Report any safeguarding concern, allegation or low-level concern regarding themselves or another member of staff in accordance with EMA safeguarding procedures.
i) Self-report any incident or circumstance which may reasonably be perceived as a breach of professional boundaries or the Staff Code of Conduct.

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 a 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 with children or vulnerable adults through personal social media accounts, personal email accounts, personal telephone numbers, messaging applications or other unauthorised communication channels .
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 adult to become blurred or unsafe, including during educational visits, social events, celebration activities, transport arrangements or other less formal settings.
n) Use personal devices to photograph, video record or store images of children or vulnerable adults except where expressly authorised in accordance with EMA procedures.
o) Engage in online behaviour that may undermine professional boundaries, bring EMA into disrepute, or compromise the welfare of a child or vulnerable adult.

3.16. Early help & Family help

Early help means providing support as soon as a problem emerges at any point in a child's life. Under the reforms set out in Working Together to Safeguard Children 2026, children and families who require co-ordinated support may receive this through a Family Help approach, which brings together targeted early help and additional support services to provide the right help at the right time.

Where a child would benefit from co-ordinated support, an assessment and multi-agency plan may be arranged in accordance with local Family Help or Early Help procedures. Chapter 1 of Working Together to Safeguard Children provides detailed guidance on providing help, support and protection for children and their families.

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:

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 absent, persistently absent, missing education, missing from home, missing from care, or otherwise vulnerable due to unexplained absences.
f) is misusing drugs or alcohol themselves.
g) is at risk of modern slavery, trafficking, criminal exploitation., sexual exploitation, or other forms of exploitation.
h) is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse, homelessness or financial hardship.
i) has returned home to their family from care.

j) is showing early signs of abuse and/or neglect.
k) is showing early signs of abuse, neglect, exploitation or emotional harm.
l) is at risk of radicalisation, extremism or terrorism
m) is a privately fostered child.
n) has experienced discrimination, prejudice, isolation or other vulnerabilities which may place them at increased risk of harm.
o) is affected by online safety concerns, including online exploitation, grooming, harmful online content, cyberbullying or inappropriate use of technology.
Is experiencing mental health difficulties, emotional wellbeing concerns or behavioural changes that may indicate the need for additional support.
p) is questioning their gender identity and may benefit from additional support, signposting or safeguarding consideration.

EMA recognises that learners with SEND may face additional safeguarding challenges and barriers to recognising abuse, communicating concerns, or seeking support. Staff should therefore remain particularly vigilant and maintain professional curiosity when working with learners who have additional needs.

EMA also recognises the need for a proactive approach to supporting positive mental health and emotional wellbeing as part of safeguarding. Mental health concerns can, in some cases, be an indicator that a child has experienced abuse, neglect, exploitation or trauma, or may be at risk of harm. Staff are trained to identify signs of emotional distress, changes in behaviour and emerging mental health concerns, and to respond appropriately.

Where appropriate, EMA will provide support through internal wellbeing, pastoral and safeguarding systems and may refer learners to external services, including health, mental health or specialist support agencies. Resources, guidance and referral pathways are available to staff to support learners who may require additional help.

Staff who identify a child or young person who may benefit from early intervention, Family Help or other additional support must record their concerns on MyConcern and discuss them with a member of the Safeguarding Team or a Designated Safeguarding Lead. Consideration will then be given to the most appropriate level of support, intervention, referral, assessment or Family Help response required.

Concerns requiring early intervention should be addressed as soon as possible to ensure that children, young people and vulnerable adults receive the right help at the right time. Where appropriate, EMA will work collaboratively with children, families and partner agencies to support positive outcomes and reduce the risk of needs escalating.

3.17. Information sharing and confidentiality

EMA recognises that effective safeguarding depends upon the timely, appropriate and lawful sharing of information. EMA will maintain robust information-sharing arrangements with relevant agencies and professionals working to safeguard children, young people and vulnerable adults, including schools, colleges, local authorities, social care services, health professionals, police and other safeguarding partners.

Staff should be aware that safeguarding information will often be highly sensitive and must be handled securely and confidentially. However, concerns about confidentiality must never prevent appropriate information sharing where there are concerns that a child, young person or vulnerable adult may be at risk of harm. The safety and welfare of the individual is paramount.

Information will be shared on a need-to-know basis and only with those individuals and agencies who require access in order to safeguard or support a child, young person or vulnerable adult. Decisions regarding information sharing will be proportionate, justified, appropriately recorded and, where necessary, supported by the Designated Safeguarding Lead (DSL).

EMA recognises that some safeguarding concerns may involve particularly sensitive personal information, including matters relating to health, disability, family circumstances, sexual orientation, gender identity, mental health, exploitation or abuse. Such matters will be managed sensitively, lawfully and in accordance with safeguarding and data protection requirements while ensuring that appropriate protective action is taken where necessary.

Where appropriate and safe to do so, the child, young person or vulnerable adult will be informed that information will be shared and the reasons for doing so. Staff should be open and honest about their safeguarding responsibilities and must never promise absolute confidentiality or secrecy.

Conversations relating to safeguarding concerns should be conducted privately and respectfully. Safeguarding records, notes and reports will be maintained securely, stored separately from general learner records where appropriate, and accessed only by authorised personnel.

Staff and volunteers must not discuss safeguarding cases with anyone who is not directly involved in the management of the concern. Any queries, concerns or requests for information should be directed to the DSL.

EMA complies with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and relevant information-sharing guidance. Staff should understand that data protection legislation does not prevent, or limit, the sharing of information for the purposes of keeping children and vulnerable adults safe.

Consent should be sought before sharing personal information where appropriate. However, consent is not required where there is a lawful basis to share information in order to safeguard a child, young person or vulnerable adult. Information should be shared without delay if obtaining consent would place an individual at increased risk of harm, prejudice the prevention or detection of crime, interfere with safeguarding enquiries, or otherwise compromise the safety and welfare of the individual or others.

All information-sharing decisions should be accurately recorded, including what information was shared, with whom, for what purpose, when it was shared, and the rationale for the decision.

EMA expects all staff to share information appropriately, proportionately and without delay to ensure that children, young people and vulnerable adults receive the right help and protection at the right time.

3.18. Online safety - Policy

EMA recognises that online safety is a fundamental aspect of safeguarding and child protection. Technology is an integral part of everyday life and can present both opportunities and risks for

children, young people and vulnerable adults. Online safety should therefore be considered as part of EMA's whole-setting safeguarding approach.

EMA is committed to creating a safe online environment and takes reasonable and proportionate measures to protect learners, staff, volunteers and visitors from harmful online content, contact, conduct and commerce. EMA will filter and monitor internet access in a responsible, appropriate and transparent manner to support the safety and wellbeing of all users.

EMA also recognises that AI related abuse is a real and present safeguarding risk and will be viewed with the same level of gravity as physical abuse. Intimate AI generated imagery of students is to be treated in the same manner as real intimate imagery of students and will be treated as sexual harassment and/or coercion, even if the student was not involved in the production of the image.

If perpetrated between students such behaviour will be viewed as child-on-child abuse, and if a student under 18 is the subject of such imagery, it will be treated as a criminal offence.

EMA aims to:

a) Maintain robust and effective processes to safeguard learners, staff and visitors online.
b) Ensure online safety is embedded within safeguarding, education, pastoral support and risk management arrangements.
c) Protect and educate learners regarding the safe, responsible, respectful and lawful use of technology, including mobile devices, social media, messaging platforms, gaming technologies and artificial intelligence tools.
d) Ensure staff receive appropriate online safety training and understand their safeguarding responsibilities in relation to technology.
e) Establish clear procedures for identifying, reporting, responding to and escalating online safety concerns.
f) Maintain clear expectations regarding the use of mobile phones, personal devices, social media and digital communications.

EMA recognises the four broad categories of online risk identified by the Department for Education and will take proportionate steps to manage and mitigate these risks.

Content

The risk of exposure to illegal, inappropriate, misleading or harmful content, including violence, hate speech, pornography, self-harm, suicide, racism, anti-Semitism, extremism, radicalisation, misogyny, conspiracy theories, misinformation, disinformation, and AI-generated harmful content.

Contact

The risk of harmful interactions online, including online grooming, exploitation, coercion, sexual abuse, criminal exploitation, radicalisation, commercial advertising, fraud and adults posing as children or young people.

Conduct

Online behaviour that may cause harm, including cyberbullying, harassment, sharing of explicit images (whether real or AI generated), consensual and non-consensual sharing of nude and semi-nude images (whether real or AI generated), online abuse, harmful challenges, manipulation and misuse of technology.

Commerce

Risks associated with online gambling, financial scams, phishing, fraudulent activity, inappropriate advertising, cryptocurrency scams and other forms of online financial exploitation.

EMA will review online safety arrangements regularly and amend procedures in response to emerging technologies and emerging safeguarding risks.

3.19. Online safety – In Practice

EMA will educate students about online safety through an age, stage and needs-appropriate curriculum which reflects the risks faced by learners in both educational and community settings, this education will include:

a) Safe and responsible use of the internet, technology and social media.
b) Protecting personal information, privacy and digital identity.
c) Recognising online abuse, exploitation, radicalisation, scams and harmful content.
d) Understanding consent, respectful online relationships and appropriate online behaviour.
e) Recognising misinformation, disinformation and manipulated online content.
f) Safe and responsible use of Artificial Intelligence tools.
g) How to report online safety concerns and seek support.
h) Cyberbullying awareness, including how to report concerns whether as a victim or witness.

EMA will also:

a) Provide online safety and safeguarding training to all staff.
b) Ensure staff understand online safeguarding risks including: cyberbullying, online exploitation, radicalisation, sharing of explicit images, artificial intelligence risks, deepfakes and emerging technologies, together with how to recognise warning signs of abuse from these risks in students.
c) Share guidance and reporting procedures with parents, carers and relevant stakeholders.
d) Maintain clear expectations regarding staff use of personal devices.
e) Prohibit staff from photographing, recording or storing images of learners on personal devices unless expressly authorised under EMA procedures.
f) Require all staff, students, volunteers and visitors to comply with acceptable use requirements.
g) Ensure that breaches of acceptable use requirements are managed appropriately through safeguarding, disciplinary or behaviour procedures.
h) Ensure staff understand and apply DfE guidance regarding searching, screening and confiscation of student personal devices where appropriate.

3.20. Filtering and monitoring

The DSL has lead responsibility for online safety and safeguarding, including oversight of filtering and monitoring arrangements.

The DSL will work closely with wider Senior Leadership Team and EMA's outsourced IT provider, to ensure that filtering and monitoring systems remain effective, proportionate and appropriate to the risks faced by students and staff.

EMA maintains filtering and monitoring systems designed to reduce learners' exposure to harmful content and online risks whilst supporting legitimate educational use of technology.

Filtering and monitoring arrangements are reviewed regularly and form part of EMA's safeguarding governance processes.

EMA currently uses:

a) DrayTek Web Content Filtering with Cyren services.
b) Bitdefender endpoint protection and web filtering controls.
c) Safe Search functionality where available.
d) Browser and device configuration controls.
e) Network and device-level monitoring tools.

EMA tests the effectiveness of filtering controls at least termly using recognised industry testing tools, including testfiltering.com, and reviews performance against recognised filtering standards.

Any identified weaknesses, concerns or technical vulnerabilities will be documented, risk assessed and addressed promptly with EMA's outsourced IT provision.

Filtering and monitoring systems apply, where technically possible, to:

a) EMA-owned devices.
b) Guest accounts.
c) Network-connected devices.
d) All internet connections provided by EMA, including backup connections.

Filtering arrangements are risk-based and take account of the age, needs and vulnerability of learners, whilst ensuring internet access remains suitable for educational use.

3.21. Monitoring

EMA adopts a proportionate risk-based approach to monitoring online activity.

Monitoring arrangements are designed to identify safeguarding concerns, inappropriate online behaviour, attempts to access harmful content, breaches of policy and potential risks to children, young people, vulnerable adults and staff.

Due to EMA's relatively small student groups, high staff-to-student ratios and SEND-focused provision, online activity is monitored through a combination of:

a) Direct supervision by staff.
b) Classroom observation and support.
c) Safeguarding reports and concerns raised through staff observation.
d) Filtering and monitoring technologies.
e) Device and network monitoring systems.
f) Regular review of filtering and monitoring reports.

EMA carries out an annual review of online safety arrangements, supported by a documented risk assessment which considers:

a) Emerging technology risks.
b) Artificial intelligence developments.
c) Learner vulnerabilities.

d) Cyber security threats.
e) Trends identified through safeguarding concerns.
f) Effectiveness of filtering and monitoring systems.

All staff are responsible for remaining vigilant and appropriately reporting safeguarding or technical concerns immediately, for example if they:

a) Witness or suspect access to harmful, illegal or inappropriate content.
b) Identify online behaviour that may place a student at risk.
c) Become aware of cyberbullying, online abuse, exploitation, radicalisation or other online safeguarding concerns.
d) Become aware of weaknesses in filtering, monitoring or cyber security controls.

EMA recognises that filtering and monitoring systems are important safeguarding tools but cannot replace effective supervision, professional curiosity, staff vigilance and a strong safeguarding culture.

3.22. 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 and are to be escorted by a member of staff whilst on site.

3.23. 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, other children and 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) Children subject to a Child in Need plan or subject to a Child Protection Plan
e) Learners who may be vulnerable to exploitation, criminal activity, serious violence, county lines, radicalisation or other contextual safeguarding risks.

EMA will ensure that all staff have an effective understanding of the local safeguarding context. Safeguarding training, updates and risk assessments will take account of local and regional safeguarding risks to ensure staff are appropriately prepared to identify, respond to and manage issues that may arise.

EMA recognises that abuse, neglect and exploitation can occur outside the family home and may take place within peer groups, educational settings, public spaces, transport networks, community environments and online. This includes safeguarding concerns arising within peer and intimate relationships, both on-site and online, where coercive and controlling behaviour, sexual violence, sexual harassment, emotional abuse, criminal exploitation or other forms of harm may be present.

EMA will work collaboratively with local authorities, safeguarding partners and other agencies, sharing relevant information where appropriate to support effective assessments, interventions and the wider aims of contextual safeguarding.

3.24. Looked After Children

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

3.25. Child on child abuse

EMA recognises that child-on-child abuse is most likely to include, but may not be limited to, bullying (including cyberbullying), prejudice-based and discriminatory bullying, abuse in intimate personal relationships between children, physical abuse, sexual violence, sexual harassment, consensual and non-consensual sharing of nude and semi-nude images and/or videos (howsoever generated), causing someone to engage in sexual activity without consent, upskirting, initiation or hazing-type violence and rituals, exploitation, coercive or controlling behaviour, and abuse facilitated through technology, including artificial intelligence.

EMA maintains the attitude that child-on-child abuse is likely to occur within the setting, even where there are no reported incidents. All reports will be taken seriously and victims will be supported.

EMA recognises that whilst any child can be affected by child-on-child abuse, girls are more likely to be victims of sexual violence and sexual harassment and that children with SEND can be particularly vulnerable to abuse and exploitation.

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

a) Staff receive training to recognise the indicators of child-on-child 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 adults in a pro-active manner to inform awareness of child-on-child 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, and that perpetrators are treated as victims in their own right.
d) A victim-centred approach is adopted and will ensure that the wishes, feelings and lived experiences of victims are considered when determining appropriate support and safeguarding responses.
e) All cases of child-on-child abuse will be recorded on "MyConcern".

Child on child 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.
i) Group-based sexual exploitation.
j) Coercive or controlling behaviour, including monitoring movements, restricting friendships, controlling communication (including online activity), emotional manipulation, intimidation, isolation, or creating dependency.
k) Technology-facilitated abuse, including the creation, manipulation or sharing of AI-generated, deepfake, altered or synthetic images, videos or audio intended to harass, humiliate, exploit, intimidate, coerce or sexually target another person.
l) Prejudice-based, discriminatory or hate-related abuse, including behaviour motivated by protected characteristics, perceived differences or vulnerabilities.

3.26. Children who are absent from education

EMA recognises that children who are absent from education, as well as those who are persistently absent, severely absent, repeatedly late, or displaying unusual attendance patterns, may be at increased risk of safeguarding concerns including abuse, neglect, child criminal exploitation, child sexual exploitation, mental health difficulties, radicalisation, domestic abuse, forced marriage, honour-based abuse, online exploitation and other forms of harm.

Attendance, absence and safeguarding are closely linked, and EMA is committed to identifying and responding promptly to any attendance concerns that may indicate a student is at risk.

EMA understands its statutory responsibility to work with Local Authority Children's Services and other relevant agencies where absence from education or attendance patterns may indicate a safeguarding concern.

Attendance registers are completed twice a day. Where a student under the age of 18 is expected to attend but is absent without explanation, staff will make timely enquiries with parents, carers or other appropriate contacts to establish the reason for absence and to satisfy themselves that the learner is safe. Additional enquiries and safeguarding consideration will be undertaken where a student:

a) Fails to attend without a satisfactory explanation.
b) Is frequently absent.
c) Is persistently absent.
d) Is severely absent.
e) Is repeatedly late.
f) Displays unusual patterns of attendance.
g) Experiences sudden or unexplained changes in attendance.
h) Is subject to a reduced timetable or alternative attendance arrangements.
i) Goes missing from education, home, care or other settings.

Where attendance concerns are identified, EMA will consider whether there may be underlying safeguarding concerns and will not assume that poor attendance is solely an educational issue.

Where safeguarding concerns are known or suspected, the DSL will consider the need for early help, targeted support, referral to Children's Social Care, notification to the Police, or engagement with other relevant agencies as appropriate.

All attendance-related safeguarding concerns, actions and decisions will be recorded on MyConcern and regularly reviewed.

Student attendance is monitored routinely by curriculum leaders, the Safeguarding Team and Senior Leadership Team. Where attendance levels fall below expected standards, or where attendance patterns give cause for concern, an attendance support plan may be implemented to identify barriers, support engagement and address any underlying safeguarding risks.

EMA recognises that learners with SEND may face additional barriers to attendance and communication and therefore attendance concerns involving these learners will be considered carefully and in the context of their individual needs and vulnerabilities.

Attendance data, patterns of absence, persistent absence, severe absence and safeguarding-related attendance concerns are reviewed regularly by senior leaders and reported to Governors/Directors to ensure appropriate oversight, scrutiny and intervention.

3.27. Staff training

The DSL and Deputy DSLs will undertake appropriate safeguarding and child protection training at least every two years and will update their knowledge and skills regularly, and at least annually, to keep up to date with developments in safeguarding policy, legislation, local procedures and emerging risks.

This training will equip them with the knowledge and skills required to carry out their role, including managing referrals, working with other agencies, online safety, filtering and monitoring, information sharing, early help, child protection and safeguarding learners with SEND.

All staff, including agency staff, volunteers, governors/directors and those who do not work directly with children, will read and understand Part One of Keeping Children Safe in Education (KCSIE) and will receive safeguarding and child protection training as part of their induction.

All staff will receive regular safeguarding and child protection training throughout their employment (at least annually), including updates relating to KCSIE, local safeguarding procedures, online safety, Prevent, child-on-child abuse, sexual violence and sexual harassment, low-level concerns, attendance risks, and emerging safeguarding issues. This training may be delivered through face-to-face sessions, e-learning modules, briefings, workshops or other suitable methods, and is designed to ensure staff have the relevant knowledge and skills required to safeguard children and young people effectively.

EMA will maintain records of safeguarding training undertaken by staff, volunteers and governors/directors and will monitor compliance to ensure training remains current and effective.

3.28. Use of reasonable force

KCSiE 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 student by the arm out of the classroom.

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, using the chosen incident management software in place at the time.

Where relevant, staff should have regard to individual risk assessments, behaviour support plans, Positive Behaviour Support strategies and agreed de-escalation approaches when responding to incidents.

3.29. 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 Authority. 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.

3.30. Child on child sexual violence and sexual harassment

Any report made of child-on-child sexual violence or sexual harassment, harmful sexual behaviour, or technology-facilitated sexual abuse will be taken seriously and responded to promptly, proportionately and in a victim-centred manner.

EMA recognises that sexual violence and sexual harassment can occur both online and offline and may occur between children of any age and sex. Such behaviour is never acceptable and will never be dismissed as banter, part of growing up, a joke, harmless behaviour, or accepted as part of a relationship.

The immediate safety, welfare and wishes of the victim will be a key consideration in all decision-making. No report should ever be dismissed as banter, part of growing up, a joke, harmless behaviour, or accepted as part of a relationship.

Following any report, the DSL will conduct a thorough risk assessment that considers:

a) the victim, especially their protection and support.
b) the alleged perpetrator, including any safeguarding needs, support requirements and risks presented.

c) all the other children (and, if appropriate vulnerable adults and staff) at EMA, especially any actions that are appropriate to protect them.
d) Whether the incident indicates wider safeguarding concerns, patterns of behaviour, harmful sexual behaviour, exploitation, abuse within intimate relationships, or technology-facilitated abuse.
e) Appropriate arrangements to protect all parties whilst any investigation, assessment or intervention is ongoing.

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.

The DSL will consider whether the incident should be referred to Children's Social Care, the Police, the Local Authority Designated Officer (where relevant) or other specialist agencies.

EMA recognises that children who are victims of sexual violence or sexual harassment are likely to find the experience distressing and may require ongoing support. Appropriate support will therefore be provided to both the victim and the alleged perpetrator on a case-by-case basis, taking account of safeguarding responsibilities, identified risks, individual needs and the views of those involved.

Where allegations are substantiated, EMA will work with relevant agencies and families to ensure that appropriate protective measures, support and interventions are implemented to safeguard all individuals involved.

3.31. 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 and safer recruitment process.

3.32. Regulated activity

EMA recognises that due to the nature of its organisational set-up and the close interactions across different areas of activity, all staff or volunteers working at EMA will be engaging in regulated activity relating to children or vulnerable adults, therefore an enhanced DBS check which includes both children's, and adult's, barred list checks is required for all appointments.

3.33. DBS Management

As all staff are deemed to engage in regulated activity, if a DBS check has not been completed EMA may delay the start date of a potential staff member.

However, in exceptional circumstances a member of staff may be employed, but is not to attend site until, EMA has received notification from its chosen umbrella company that a DBS check has been completed. Each case will be looked at in consultation with the Designated Safeguarding Lead and SMT, be clearly documented and supported with a suitable risk assessment.

During such a period EMA will provide access to training courses via an individual's personal email. An EMA issued ID badge cannot be issued until the DBS certificate is seen. If the employee is requested to visit an EMA setting, they are to report to reception, sign-in as a visitor and be escorted whilst on site.

If the umbrella company advises that the DBS certificate contains information that requires review by EMA i.e. not a "clear certificate", then the member of staff is only to attend site in the first instance

to show the certificate results to the DSL or HR Administrator. What is recorded on such a certificate will inform the decision of whether to proceed with employment (together with any mitigating measures that may be required), or to withdraw the offer of employment, or terminate the contract.

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 and volunteers are encouraged 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.

On an annual basis, 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.

3.34. Overseas Checks

EMA recognises that applicants who have lived or worked overseas may have additional information relevant to their suitability to work with children, young people and vulnerable adults.

Accordingly, where an applicant has lived, worked or studied outside the United Kingdom, EMA will make reasonable efforts to obtain from the applicant additional suitability information, which may include overseas criminal record checks, certificates of good conduct, employment references, professional references, qualification verification and any other relevant background checks.

Any overseas information obtained will be considered alongside Disclosure and Barring Service (DBS) checks and other safer recruitment checks.

Where overseas information is unavailable, the reasons will be recorded and a risk assessment undertaken before any appointment is confirmed. All overseas checks will be recorded on the Single Central Record where required.

3.35. Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may consist of a single incident or a pattern of incidents. Abuse may be psychological, emotional, physical, sexual or financial, and includes coercive and controlling behaviour.

EMA recognises that children, young people and adults can experience domestic abuse:

a) within the family home
b) within peer or intimate relationships, including teenage and young adult relationships
c) through online or digital means, including monitoring, threats or control

Domestic abuse may impact students directly or indirectly through witnessing, hearing or otherwise experiencing its effects. EMA recognises that experiencing domestic abuse can have a significant impact on a student's safety, wellbeing, behaviour, mental health and educational outcomes.

Learners with SEND aged 16–25 may not recognise abusive behaviours or may struggle to communicate concerns. Staff must treat any indicators of coercive or controlling behaviour as a safeguarding concern, regardless of the learner's age or perceived capacity.

3.36. Coercive and Controlling Behaviour

EMA recognises coercive and controlling behaviour as a form of abuse and, in some circumstances, domestic abuse.

It may occur within intimate relationships, between peers, within families, online and through technology, and in relationships involving students aged above 18 who may be vulnerable.

This includes isolation, intimidation, emotional manipulation, monitoring, restriction of independence, financial control and digital surveillance. Any concerns relating to coercive or controlling behaviour must be recorded and reported in line with EMA safeguarding procedures.

3.37. 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 Education 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 Education 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.

3.38. 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. EMA aligns with the updated Prevent objective introduced in the 2023 statutory guidance: to tackle the ideological causes of terrorism.

EMA recognises that radicalisation is a safeguarding issue and that vulnerability to radicalisation can arise from a range of factors, including isolation, unmet needs, discrimination, grievance, mental health concerns, online influences, exploitation and exposure to extremist narratives, misinformation, disinformation and harmful ideologies.

EMA works in active partnership with the Local Authority Prevent Coordinator, Dorset Police Prevent Team and local safeguarding partnerships. EMA receives regular updates on local extremist risks and uses this information to update our Prevent Duty Risk Assessment, staff training, curriculum planning and safeguarding procedures.

The Prevent Duty Risk Assessment is reviewed at least annually, or as needed if new information is received on local or national threat data and is kept under review by the DSL.

EMA monitors Prevent referrals, reviews the Prevent Duty Risk Assessment and reports outcomes to the Senior Leadership Team and the governance board.

EMA complies with the Prevent Duty, aiming to identify and support students at risk of radicalisation. Staff receive training on recognizing behavioural changes and extremist views. Referral pathways to the Channel program are detailed, ensuring swift action in partnership with local authorities. Staff are encouraged to report concerns regarding extremist language, symbols, or group associations.

Accordingly, EMA defines extremism as:

'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 education advisors; 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.

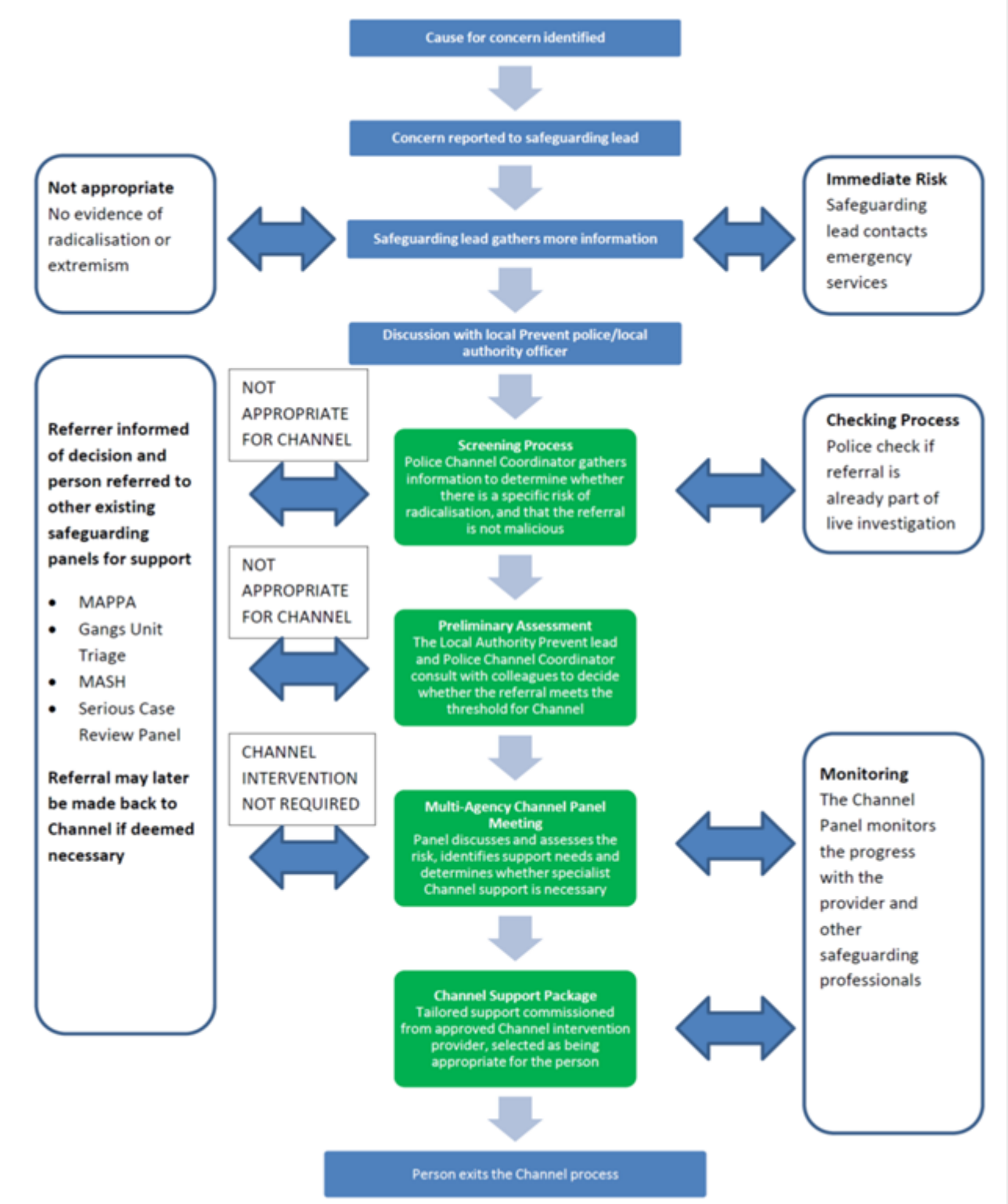
As part of wider safeguarding responsibilities staff will be alert to:

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, messaging platforms, gaming platforms or AI-generated content.
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.

3.39. Reporting concerns of extremism or radicalisation

Where there are concerns that a learner may be vulnerable to radicalisation, extremism or terrorism, staff must report these concerns immediately to the DSLin accordance with EMA safeguarding procedures. The DSL will consider whether the concern requires referral to Prevent,

the Police, Children's Social Care, Adult Social Care, the Channel programme or another appropriate agency. (Channel Referral Process below)



3.40. 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"*.

Before a visiting speaker is allowed to engage in any way with students a risk assessment is to be completed that considers how the speaker was found, their background, any obtainable references, any meetings with staff before coming into college, the planned interactions with students and how these are to be supervised so that students are able to question, challenge and critically evaluate information presented to them in a safe and respectful environment.

The risk assessment will also consider any publicly available information relating to the speaker's online presence, published materials, social media activity, and any evidence of extremist, discriminatory, hateful or otherwise inappropriate views that may present a safeguarding risk - it is to be signed off by the Head of Education, or DSL.

If it is to be a regular arrangement, then plans should be put in place to enter them onto the Single Central Record and obtain further background checks/assurances in line with EMA Safer Recruitment requirements for volunteers; this is a decision to be taken by the Head of Education or DSL.

A log containing details of the speaker, the purpose of the visit, the staff member responsible, and whether they are signed in as a visitor or added to the SCR is to be maintained.

If any member of staff has any concern regarding a venue or event they should contact the DSL or 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.

3.41. 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 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.

3.42. 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.

Furthermore, County Lines exploitation may be facilitated through online platforms, social media, gaming environments, messaging applications and other forms of technology. Staff should be alert to indicators that technology is being used to groom, recruit, control or exploit children and vulnerable adults.

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

3.43. 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.
h) Being found in possession of drugs, weapons, large amounts of money or unexplained mobile phones.
i) Travelling to unfamiliar locations or being found a significant distance from home.
j) Receiving excessive calls, messages or contacts from unknown individuals.
k) Becoming secretive about activities, friendships or online communications.
l) Being at risk of exclusion, disengagement from education, or significant changes in attendance patterns.

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.

3.44. Child Sexual Exploitation (CSE)

EMA recognises that CSE is a form of child sexual abuse which could occur in the provision, and learners with SEND aged 16-25 may be particularly vulnerable to sexual exploitation and may face barriers to recognising abusive behaviours, communicating concerns or seeking help.

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. It is possible that the abuse may also be perpetrated by more than one individual at a time, or singularly amongst a group of perpetrators over a period of time, i.e. group-based.

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 (through social media, online gaming platforms, messaging applications, live streaming services, artificial intelligence technologies, manipulated or synthetic imagery, and other forms of technology). 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.

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.
c) Going missing from home, education or care.
d) Receiving unexplained gifts, money, accommodation, substances or other items.
e) Displaying secrecy around relationships, online activity or mobile phone use.
f) Associating with controlling or significantly older individuals.
g) Suffering changes in emotional wellbeing, behaviour, attendance or engagement in education.
h) Being subject to excessive communication, monitoring or contact from another person.

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 will assess the concerns and, where appropriate, make referrals to Children's Social Care, the Police, health services or other relevant agencies. All concerns regarding CSE will be treated as

safeguarding matters and taken seriously regardless of the apparent age, consent, relationship status or presentation of the individual involved.

3.45. 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, carrying weapon, weapon-related incidents 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.

For the purposes of safeguarding, a weapon may include, but is not limited to, knives, bladed articles, firearms, imitation firearms, air weapons, corrosive substances, offensive weapons, tools adapted for use as weapons, or any item carried or used with the intention of causing harm or threatening another person.

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.

Where a serious violence incident, threat or weapon-related incident occurs, staff should recognise that the period immediately following the event may provide a valuable safeguarding and intervention opportunity. These "teachable moments" can help a child or young person reflect on the consequences of their actions, understand risks, engage with support services and consider alternative choices. Any such conversation should be appropriate to the individual's needs, recorded where necessary, and undertaken alongside safeguarding procedures and risk assessment, not as a replacement for them.

EMA recognises that children involved in serious violence may themselves be victims of abuse, coercion, criminal exploitation, trauma or neglect. Staff should therefore adopt a child-centred, safeguarding-focused approach, seeking to understand the underlying causes of behaviour as well as the presenting risk.

3.46. Responding to Threats of Violence

EMA recognises that threats of violence, whether made verbally, in writing, online, through technology, or through behaviour, may indicate that a student is experiencing distress, crisis, exploitation, coercion, radicalisation, criminal influence, unmet needs, mental health difficulties, or poses a genuine risk to others.

All threats of violence must be taken seriously and reported immediately by phone to the DSL so that a decision can be made on the immediate response to the situation.

The DSL will consider the nature of the threat, the learner's intent, capability, means, access to weapons, previous behaviour, safeguarding history, vulnerability factors and any known risks. This assessment will inform decisions regarding safeguarding measures, risk management, parental involvement and referrals to external agencies.

When responding to a threat, staff should:

a) Remain calm and avoid escalating the situation.
b) Prioritise the immediate safety of all learners, staff and visitors.
c) Assess whether there is an immediate risk of harm to any individual.
d) Seek assistance from colleagues, managers or emergency services where necessary.
e) Record the exact words used by the learner wherever possible.
f) Not dismiss threats as a joke, banter, attention-seeking behaviour or a consequence of a learner's SEND, disability or communication needs without appropriate assessment.

Where appropriate, referrals may be made to Children's Social Care, Adult Social Care, the Police, Prevent, Youth Justice Services, Mental Health Services or other relevant agencies.

Where a threat presents an immediate risk of serious harm, staff must contact emergency services without delay and follow EMA's emergency procedures.

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

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

3.48. Role of an Appropriate Adult

EMA recognises the importance of the role of an Appropriate Adult in safeguarding children who are involved in police investigations or criminal justice processes. The Designated Safeguarding Lead (DSL) and Deputy DSLs must be aware of the statutory requirements relating to Appropriate Adults and ensure that relevant information is shared appropriately where safeguarding concerns arise.

The DSL will liaise with education leaders, social workers, police and other relevant professionals where there are safeguarding concerns, including ongoing enquiries under Section 47 of the Children Act 1989, police investigations or other circumstances where a child may require additional safeguarding support.

Where appropriate, EMA will support arrangements to ensure that children are able to access an Appropriate Adult when required in accordance with relevant legislation and guidance.

Guidance on the role of an Appropriate Adult can be found at: https://www.gov.uk/government/publications/appropriate-adults-guidance

3.49. External work experience students

EMA may from time to time agree to provide work experience placements to students from other educational or training settings. All such placements are to be centrally managed by HR and must follow the process laid out below. It is essential that all external students, as they are deemed to be volunteers, have a risk assessment in place.

EMA require that such students, if aged 16 or over, have an enhanced DBS check with a Children's and Adult's Barred list check completed.

EMA will process the applicant's DBS as a 'volunteer' so as to remove a potential barrier to the student finding meaningful work experience; references will also be requested.

If a DBS Check is not carried out, a full risk assessment should be completed which includes all supervisory arrangements that are in place, together with the reason a DBS check has not been undertaken.

3.50. Guidance on gender questioning children

Safeguarding Principles

When responding to children and young people who are questioning their gender, EMA will be guided by the following principles:

a) The welfare and safety of the child or young person is paramount.
b) Children who are questioning their gender may present with additional vulnerabilities, including mental health needs, SEND, trauma, or social isolation, and require sensitive, proportionate support.
c) Gender questioning alone is not a safeguarding concern; however, associated risks must be assessed and managed through existing safeguarding processes.
d) Recognition that children and young people with SEND may be particularly vulnerable to misunderstanding, influence, exploitation or unmet needs and that safeguarding assessments should take account of their individual communication and support needs.
e) Decisions will be individual, evidence-informed, recorded, and regularly reviewed.
f) The Designated Safeguarding Lead (DSL) will oversee all safeguarding assessments, decision-making and review arrangements relating to gender-questioning children and young people.

Parental / Carer Involvement

The College recognises that parents and carers play a vital role in safeguarding and promoting the welfare of children and young people.

a) Parents or carers will normally be informed and involved in discussions and decisions relating to a child or young person questioning their gender
b) In exceptional circumstances, where informing parents or carers would place the child or young person at a greater risk of harm, the DSL may decide to delay or limit disclosure.
c) Any decision not to involve parents or carers must:
    - be clearly justified on safeguarding grounds
    - be recorded in writing
    - be reviewed regularly
    - involve advice from appropriate safeguarding partners where necessary

Social Transition in College

Requests relating to social transition will be treated as safeguarding matters and considered through EMA's safeguarding processes rather than as administrative changes.

In line with KCSIE and the findings of the Cass Review:

a) There is no automatic right to social transition in education settings.
b) Social transition is not considered a neutral act, and may have implications for a child or young person's wellbeing.
c) Staff must not encourage or initiate social transition.

Any request will be considered:

a) cautiously
b) on a case-by-case basis
c) through safeguarding procedures
d) with DSL oversight
e) considering the impact on the individual and on others

Where any steps are agreed:

a) they will be time-limited
b) subject to regular review
c) documented
d) revisited if circumstances change

Use of Names and Pronouns

The College will address learners by their legal name for official records.

Any request regarding alternative names or pronouns will be considered on an individual basis, taking account of the child's age, understanding, wishes and feelings, parental views, safeguarding considerations, any relevant clinical advice, and the rights and welfare of others.

No member of staff or learner will be compelled to use particular language, and honest mistakes will not be sanctioned.

Respectful communication is expected at all times, and bullying or harassment is not tolerated.

Single-Sex Spaces, Activities and Accommodation

The College recognises its legal duties relating to biological sex.

a) Single-sex toilets, changing rooms, accommodation and sporting activities will continue to be organised on the basis of biological sex, in line with statutory safeguarding and equality requirements.
b) Learners will not be required to share intimate spaces with members of the opposite sex.
c) Where reasonably practicable, additional or alternative arrangements (such as private facilities) may be explored to support dignity and wellbeing.

Recording, Review and Training

All discussions, decisions and actions related to gender-questioning issues will be recorded securely in safeguarding records.

Decisions will be subject to review, particularly where circumstances or risks change.

Staff will receive training and safeguarding updates to ensure they understand:

a) how to respond sensitively
b) when to escalate concerns

c) the importance of professional boundaries and safeguarding oversight

3.51. Modern Slavery

EMA recognises modern slavery as a serious safeguarding issue that can affect children and young people, including through child criminal exploitation, child sexual exploitation, forced labour, domestic servitude, debt bondage, trafficking and other forms of exploitation.

Staff should be aware that safeguarding incidents and behaviours can be associated with factors outside the college and can be linked to criminal exploitation, organised crime groups and wider forms of abuse and exploitation.

All staff must remain vigilant to indicators that a child may be at risk of, or experiencing, modern slavery or human trafficking. Possible indicators may include unexplained absences, sudden changes in behaviour, evidence of control by others, signs of physical or emotional abuse, possession of unexplained money or items, travelling to unknown locations, working excessive hours, poor living conditions, or concerns relating to criminal or sexual exploitation.

Any concerns that a child may be at risk of modern slavery, trafficking or exploitation must be reported immediately to the DSL who will assess the concern, consider the need for referral to Children's Social Care, the police or other appropriate agencies, and ensure that information is shared in accordance with safeguarding procedures.

Where a child is in immediate danger or at risk of significant harm, staff must take appropriate action without delay, including contacting emergency services where necessary.

Modern slavery and trafficking concerns will always be treated as child protection matters, with the welfare of the child remaining paramount.

3.52. Mental Health

EMA recognises that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect, exploitation or other adverse childhood experiences.

All staff should be aware that safeguarding and promoting the welfare of children includes supporting their mental health and wellbeing, whilst recognising that only appropriately trained professionals should attempt to diagnose mental health conditions.

All staff have a responsibility to be alert to signs that a student may be experiencing mental health difficulties. These may include, but are not limited to, sudden changes in behaviour, persistent absence, withdrawal from activities or relationships, low mood, anxiety, self-harm, risk-taking behaviours, significant changes in presentation, or expressions of hopelessness.

Staff should exercise professional curiosity and consider whether concerns may be linked to safeguarding issues, including abuse, neglect, exploitation, bullying, online harm, domestic abuse or other traumatic experiences.

Where staff have concerns about a student’s mental health or emotional wellbeing, they must record and report these concerns promptly in accordance with EMA's safeguarding procedures.

Concerns should be shared with the DSL, who will consider any safeguarding implications and determine whether additional support, early intervention, referral to external agencies or child protection action is required.

EMA recognises that learners with special educational needs and disabilities (SEND) may be more vulnerable to mental health difficulties and that the indicators of distress may be less obvious or may be attributed incorrectly to their additional needs. Staff should therefore remain vigilant and ensure that concerns are explored appropriately rather than being dismissed as part of a learner's disability or additional needs.

EMA will promote a culture in which learners feel safe, valued and able to seek help. Where concerns are identified, the college will work collaboratively with learners, families, health professionals, social care and other relevant agencies to ensure appropriate support is provided. The welfare of the child will always remain paramount in all decision-making.

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
Heather Helm[1,2]	Moreton	DSL	07710 215799 heather.helm@employmyability.org.uk
Sammie Eaton [2]	Moreton	Deputy Safeguarding Officer	07599 655 041 sammie@employmyability.org.uk
Craig Adams	Gillingham	Deputy Safeguarding Officer	07710 218620craig.adams@employmyability.org.uk
Craig Hutton	Adult Social Care	DSL	07599 655 061 craig.hutton@employmyability.org.uk
James Dunham[1,2]	Moreton & Gillingham	Deputy Safeguarding Officer	07599 655 040 jdunham@employmyability.org.uk
Sadie Paradise	Moreton & Gillingham	Deputy Safeguarding Officer	07599 655 098 sadie@employmyability.org.uk
Bradley Kendrick	Moreton & Gillingham	Deputy Safeguarding Officer	07599 655 064 Bradley.Kendrick@employmyability.org.uk
Shannon Crane	Moreton	Deputy Safeguarding Officer	07599 655048 Shannon.crane@employmyability.org.uk

Kate Hughes	Moreton	Deputy Safeguarding Officer	07599655106 Kate.hughes@employmyability.org.uk

[1]*Also Designated Teacher for Looked After Children*
[2]*Also 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 (DSL) has lead responsibility for safeguarding and child protection, including online safety, filtering and monitoring, and the promotion of the welfare of children and young people across EMA.

The specific responsibilities of the DSL are set out within the DSL Job Description and summarised within Section 3 of this policy.

EMA will ensure that the Designated Safeguarding Lead is a member of the senior leadership team and has the appropriate status, authority, time, funding, training, resources and support necessary to carry out the duties of the role effectively. This includes providing advice and support to staff, managing referrals, working with partner agencies, participating in strategy discussions and multi-agency meetings, supporting child protection processes, and promoting a strong safeguarding culture across the organisation.

EMA has appointed appropriately trained Deputy Designated Safeguarding Leads (DDSLs). Deputy DSLs will be trained to the same standard as the DSL and, whilst the lead responsibility for safeguarding and child protection remains with the DSL, the Deputy DSLs are authorised to act on behalf of the DSL and carry out all necessary safeguarding functions in the DSL's absence.

EMA will ensure that sufficient safeguarding leadership capacity is maintained across all sites and services so that safeguarding advice, decision-making and referrals can be undertaken without delay.

The Designated Safeguarding Lead will maintain oversight of safeguarding records and procedures and will ensure that safeguarding information is managed securely, confidentially and in accordance with statutory requirements.

The Designated Safeguarding Lead has responsibility for the oversight and maintenance of the Single Central Record (SCR) and will ensure that all required safer recruitment and vetting checks are accurately recorded, monitored and reviewed. Regular audits of the SCR will be undertaken to ensure continued compliance with statutory guidance, in addition to any reviews undertaken by the Senior Management Team.

The Designated Safeguarding Lead and Deputy DSLs will undertake appropriate safeguarding and child protection training and will regularly update their knowledge and skills to ensure that safeguarding arrangements remain effective and compliant with current legislation, statutory guidance and local safeguarding procedures.

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 accordingly if a disclosure is made to them. In addition, all staff are to be provided with access to a copy of Part One of KCSIE.

All staff must recognise that safeguarding responsibilities extend to abuse occurring between peers and within relationships involving learners aged 16–25. Adulthood does not remove vulnerability. Staff must follow safeguarding procedures where there are concerns relating to coercive, controlling or exploitative behaviour.

4.6. Executive Board

All Directors and Non-Executive Directors 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 Non-Executive Director will be nominated to lead on safeguarding on behalf of the other board members,

The nominated Safeguarding Non-Executive Director will provide appropriate oversight and challenge in relation to safeguarding arrangements across EMA. This will include receiving safeguarding assurance information from senior leaders and the Designated Safeguarding Lead, scrutinising the effectiveness of safeguarding systems and controls, and providing assurance to the Board that safeguarding responsibilities are being discharged effectively, and will perform compliance sampling exercises as directed by the board on safer recruitment activities during the course of an academic year.

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.

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.

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 01929 405 685	Will connect to Moreton reception; ask to speak to a member of the safeguarding team.
Heather Helm **heather.helm@employmyability.org.uk**	**Heather Helm Designated Safeguarding Lead**
Craig Hutton 07599 655 061 craig.hutton@employmyability.org.uk	Designated Safeguarding Lead for Adult Social Care
James Dunham 07599 655 040 jdunham@employmyability.org.uk	Head of Education, Deputy Designated Officer – Moreton & Gillingham
Steve White 07599 655 125 steve@employmyability.org.uk	Managing Director

b) External contacts

Bournemouth, Christchurch & Poole Children's First Response Hub 01202 123 334 childrensfirstresponse@bcpcouncil.gov.uk	Duty Officer
Children's Advice & Duty Service 01305 228 558	Duty Officer - Professionals only number to discuss concerns
Dorset Families and Members of the Public 01305 228 866	Duty Officer contact for families and members of the public to report a safeguarding concern out of hours
BCP Children's Out of hours 01202 738 256 childrensOOSH@bcpcouncil.gov.uk	Hours of operation are 1700 to 0900 from Monday to Friday, all day Saturdays and Sundays and all bank holidays, including Christmas Day and New Year's Day.
Dorset Children's Out of Hours Service 01305 221 000	Duty Officer
Adult Safeguarding, Dorset Council Area 01305 221 016 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 01305 221 000	Out of Hours Duty Officer
LADO **01305 221 122** **Email:** lado@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 Email (adults): adults@somerset.gov.uk	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.

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

8. Associated documents

Behaviour Policy

Safer Recruitment Policy

EMA Whistleblowing Policy

ICT Acceptable use Policy