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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, education advisors, staff (full time, part time, permanent, temporary, or sessional), students, agency staff and volunteers.

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3. Policy statement and associated procedures

3.1. General Policy

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

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

- a) The welfare of children is paramount in all the work we do, therefore in all the decisions we take all children, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation have an equal right to protection from all types of harm or abuse.
- b) Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse.
- c) EMA recognises that abuse may occur within peer relationships, including friendships and intimate relationships between children, young people and young adults. This includes coercive and controlling behaviour, emotional abuse, psychological harm and exploitation. Such behaviours may constitute domestic abuse, including where individuals are under the age of 18, over 18 with additional vulnerabilities, or where the relationship appears consensual. EMA acknowledges that learners with SEND aged 16–25 may be particularly vulnerable due to communication needs, dependency, social isolation, reduced capacity or previous adverse experiences.
- d) Working in partnership with children, young people, their parents, carers, and other agencies is essential in promoting young people's welfare.
- e) Staff must maintain an attitude of 'it could happen at EMA' where safeguarding is concerned, and that when concerned about the welfare of a child, staff should always act in the best interests of the child.

3.2. Key Policy Objectives

For all employees and volunteers of EMA to ensure that:

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

3.3. Policy for Guidance & Training

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

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

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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.

3.4. Designated Safeguarding Leads (DSL) responsibilities

Responsibilities of the DSL are to:

- a) Ensure this policy and associated procedures are adhered to.
- b) Respond to queries and advise EMA staff, students, agency staff and volunteers, on how to respond to any concerns relating to children and vulnerable adults, including notifying the correct agencies.
- c) Maintain key contacts and dialogue within the Pan-Dorset Safeguarding Children Partnership.
- d) Maintain ownership of the Single Central Register, and to ensure that regular checks are completed as defined in the Safer Recruitment Policy.

3.5. 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 record and report concerns. EMA defines a concern as:

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

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 they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent the staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

Staff should be aware that learners may not identify their experiences as abusive, particularly where behaviours are emotional, psychological or controlling, 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.

3.6. 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) Under no circumstances confront the adult or try to investigate the matter themselves.

3.7. 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 & Operations Director, or Managing Director.
- b) not confront the adult in question.

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

Should your concern be regarding the behaviour of the Education & Operations 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 & Operations 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 independent advisory board will provide an impartial review of the investigation prior to it being finalised.

Should both directors be implicated, then further advice will be sought from the safeguarding team at the Local Authority connected with the involved student(s).

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

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

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

- a) Behaved in a way that has harmed, or may have harmed, an individual.
- b) Possibly committed a criminal offence.
- c) Behaved in a way that indicates she/he is unsuitable to work with vulnerable adults.
- d) Taken photographs of children on a mobile device without prior agreement.

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

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

Any staff behaviour that appears to challenge boundaries or deviates from the staff code of conduct must be reported to the DSL. All such concerns will be documented to prevent escalation and to ensure early intervention where necessary.

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

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

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As outlined in the Disciplinary & Investigations Policies, EMA reserves the right to suspend a member of staff from sites during an investigation process.

3.8. Procedure for responding to a disclosure

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

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

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

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

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

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

For all other cases, where the allegation concluded to be either, unfounded, false, malicious or unsubstantiated the DSL will consider the facts and determine whether any lessons can be learned and if improvements can be made.

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

3.9. Management of reported concerns and disclosures

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

- a) Seek further advice from Social Services.

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

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

EMA will notify the Education and Skills Funding Agency via the Contact Form: General Enquiries (<https://www.gov.uk/government/organisations/education-and-skills-funding-agency>) in any of the following circumstances:

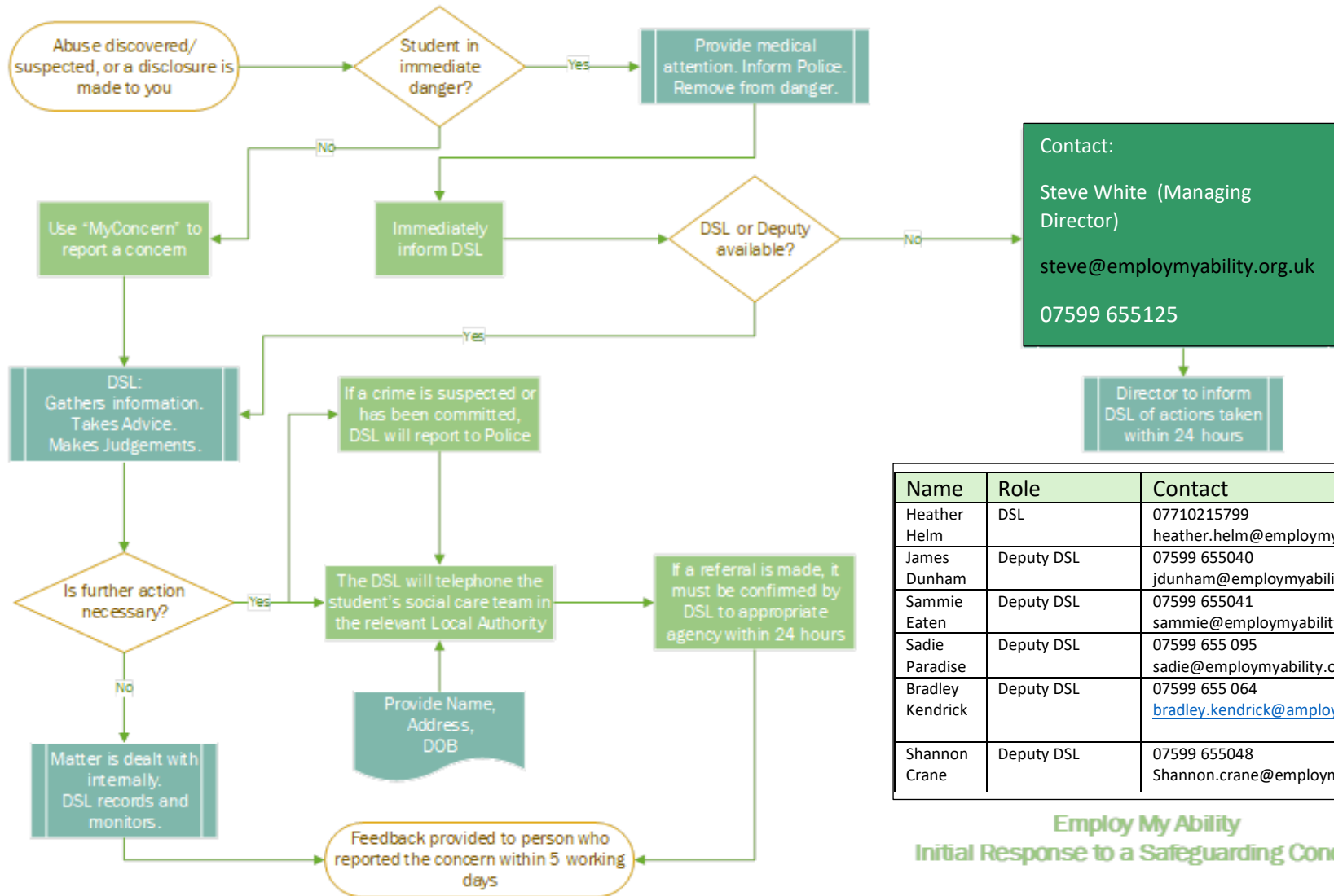
- a) ***If a referral is made*** to a Local Authority Children’s Social Care and/or the police that concerns a safeguarding concern ***related to sexual violence***.
- b) ***If a referral is made*** concerning an ***allegation of abuse*** is against a teacher, lecturer or other member of staff to the designated officer at the local authority.
- c) ***If there is an incident***, or pattern of incidents, which ***undermines the promotion of British fundamental values***, or the ability of EMA to comply with the Prevent duty.
- d) ***If a referral is made*** of an EMA member of staff for the purposes of determining whether that member of staff should be referred to a panel for the carrying out of an assessment under section 36 of the Counter-Terrorism and Security Act 2015, of the extent to which that individual is ***vulnerable to being drawn into terrorism***.

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

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

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3.10. 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 Eaten	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

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3.11. 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 must be reported immediately to a Designated Safeguarding Lead (DSL) or Deputy DSL.

If the concern relates to the DSL, staff must report directly to either the Managing Director or Education 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) Staff must not delay reporting due to absence of a DSL

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) Then inform the DSL as soon as possible

External escalation

The DSL (or staff where appropriate) 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) There are concerns about staff conduct (via LADO)

This may include escalation to:

- a) Children's Social Care
- b) Police
- c) Local Authority Designated Officer (LADO)
- d) Prevent / Channel Panel

Professional challenge and escalation

If a member of staff feels that:

- a) A concern has not been taken seriously, or
- b) Appropriate action has not been taken

They have a duty to escalate by:

- a) Re-reporting to a more senior member of staff, OR
- b) Contacting the Local Authority directly

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

Recording escalation

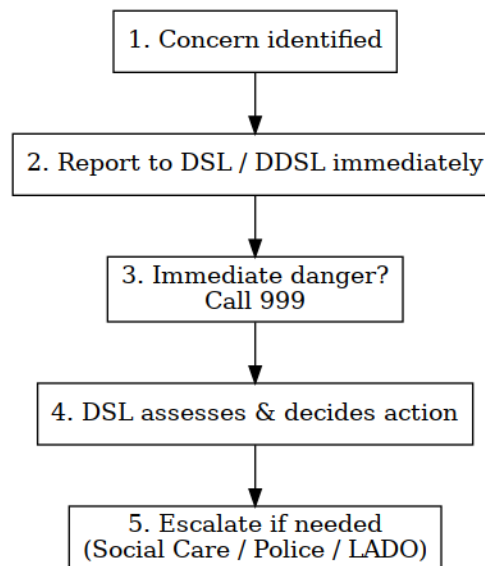
All escalation actions must be:

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- a) Recorded on MyConcern
- b) Include dates, times, decisions, and rationale

Timescales

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



3.12 Staff code of conduct

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

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

Staff must:

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

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.

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- 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 a child or vulnerable adult in an inappropriate way, including via personal emails, social media, text messages and telephone.
- g) Pass on home address, phone number, email address or other personal details to child or vulnerable adult.
- h) Arrange to meet a child or vulnerable adult in closed rooms without other staff being made aware of this in advance.
- i) Use physical punishment of any kind towards a child or vulnerable adult.
- j) Transport a child or vulnerable adult in their own vehicle without prior management approval.
- k) Access abuse images (for example pornography) or other inappropriate material.
- l) Abuse your position of trust with a child or vulnerable adult.
- m) Allow personal boundaries between themselves and a child or vulnerable to be unsafe in more informal settings, such as trips or celebration events.

3.12. Early help

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

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

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

EMA recognises the need for a proactive approach in supporting mental health as part of safeguarding. Staff are trained to identify signs of mental distress, and to handle disclosures sensitively. EMA will refer students to internal support systems and external mental health services where necessary. Resources and referral processes are available for staff to guide students in need.

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

3.13. Information sharing and confidentiality

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

Adhering to GDPR standards, EMA ensures secure handling and sharing of sensitive safeguarding information, which includes concerns and issues about gender-questioning students; such issues must be approached in a balanced and neutral manner. EMA prioritises timely, authorised information sharing with safeguarding agencies when necessary, balancing confidentiality with the student’s safety. Staff are trained on legal obligations to protect sensitive data in safeguarding contexts.

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

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

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

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

3.14. Online safety - Policy

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

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

EMA recognises the importance of safeguarding our students from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues. In order to address this EMA aims to:

- a) Have robust processes in place to ensure the online safety of students, staff and visitors.
- b) Protect and educate students and staff members alike in their safe and responsible use of technology, which includes mobile devices.
- c) Set clear guidelines for the use of mobile phones for all of EMA.
- d) Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.

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The DfE clearly defines and categorises the risks around online safety into four areas, and EMA will take steps to mitigate these risks, and staff will receive comprehensive training on these categories to recognise, monitor, and report any online safety concerns.

EMA will also conduct regular assessments of online safety practices.

a) Content

The risk of being exposed to illegal, inappropriate or harmful content, such as violence, hate speech, pornography, misinformation, disinformation (fake news), racism, self-harm, suicide, anti-Semitism, radicalisation, extremism, conspiracy theories, gender-based abuse and misogynistic content.

b) Contact

The risk of being subjected to harmful online interaction with other users, such as child-on-child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

c) Conduct

Meaning, online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying.

d) Commerce

The risks involved with online gambling, inappropriate advertising, phishing and/or financial scams.

3.15. Online safety – In Practice

This section sets out how EMA will meet its aims and address the risks in 3.15.

We will educate our students about online safety as part of our curriculum, this will include:

- a) The safe use of social media, the internet and technology.
- b) Keeping personal information private.
- c) How to recognise unacceptable behaviour online.
- d) How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim.

Furthermore, EMA will:

- a) Train staff, as part of their induction, on safe internet use and online safety and safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year.
- b) Share clear procedures with parents/carers so they know how to raise concerns about online safety.
- c) Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone. Namely that staff are allowed to bring their personal phones to college for their own use, but these are to be limited in use to non-contact time with students. Under no circumstances are staff to take pictures or recordings of students with their personal phones.
- d) Ensure all students, parents/carers, and staff sign an acceptable use agreement for the use of the internet, EMA's IT systems and equipment.

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- e) Explain the sanctions enforceable in response to a student or member of staff breaching policies on the acceptable use of the internet, IT systems and equipment.
- f) Make sure all staff, students and parents/carers are aware that staff have the power to search students' phones, as set out in the [DfE's guidance](#) on searching, screening and confiscation.

3.16. Filtering and monitoring

The DSL has lead responsibility for online safety and safeguarding which includes acting on filtering and monitoring report, safeguarding concerns, and checks to filtering and monitoring systems.

The DSL works closely with EMA's outsourced IT Provider, Newburgh Networks, and is supported by the Compliance & Risk Manager in this regard.

EMA has in place robust filtering and monitoring systems to limit students' exposure to the risk (categories described in 3.15above) from EMA's IT systems.

EMA tests the robustness of the filtering in place by using <https://testfiltering.com/> on a termly basis; these tests are run against the IWF URL list and the UK terrorist content (CTIRU) list, results analysed and any required remediations passed to EMA's outsourced IT Provider, Newburgh Networks.

EMA uses a combination of Draytek Web Content Filtering with Cyren for web filtering.

This enables our filtering system to reach all users, including guest accounts, EMA owned devices and devices using the EMA broadband connection.

Additionally, Bitdefender is our anti-virus software that has additional filtering capabilities enabled which add an extra layer of device filtering for classroom student computers.

EMA filters all internet feeds, including any backup connections, by age and ability appropriateness for the users, as well as ensuring it is suitable for an educational setting.

3.17. Monitoring

Due to EMA's limited numbers, curriculum, small class sizes and high staff to student ratio, the majority of monitoring is currently undertaken by physical monitoring of devices and whilst they are in use by students.

EMA carries out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced across our settings.

EMA has safe search enabled on all of its devices and limit access to Chrome and Edge browsers.

All staff are aware of reporting mechanisms for safeguarding and technical concerns. They should report if they witness or suspect unsuitable material has been accessed.

3.18. 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.

3.19. Contextual safeguarding and local circumstances

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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) Child on a Child in Need plan or subject to Child Protection Plan

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

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

This includes safeguarding concerns arising within peer and intimate relationships, both on-site and online, where coercive control, exploitation or emotional abuse may be present.

3.20. 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.

3.21. Child on child abuse

Child-on-child abuse refers to inappropriate, abusive or harmful behaviours between children or young people, which may also continue into young adulthood for learners aged 18–25 with SEND. This abuse may be physical, sexual, emotional or psychological, and includes exploitation, bullying, online abuse and coercive or controlling behaviour, including that which occurs within intimate or peer relationships. EMA recognises that child-on-child abuse can mirror patterns of domestic abuse and must never be minimised as “banter”, “part of growing up” or accepted relationship behaviour. Nevertheless, EMA makes the assumption that Child on Child abuse is happening in the setting, even when there are no specific reports, and that it is more likely that girls will be victims and boys perpetrators. EMA recognises that the risks of gender-based violence, and violence against women and girls are becoming more prevalent.

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.
- d) 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:

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- 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.

3.22. Children who are absent from education

EMA understands the statutory obligation that it must work with local authority children's services where absence from college indicates a safeguarding concern.

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

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

Student attendance is regularly monitored by the leadership team if attendance drops below 90% average an attendance plan is implemented to support the student's attendance. This will also be an opportunity to look at the reasons for absences and aim to safeguard the student and be vigilant for potential abuse/exploitation.

Student attendance, regular and/or prolonged absences are monitored regularly, discussed at senior leadership meetings and reported at a governor/director level.

3.23. Staff training

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

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

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

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3.24. 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 pupil 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.

3.25. Privately fostered children

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

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

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

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

3.26. Child on child sexual violence and sexual harassment

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

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

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

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

3.27. 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.

3.28. 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.

3.29. 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.

3.30. 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.

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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

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.

3.31. Coercive and Controlling Behaviour

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

3.32. 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.

3.33. 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 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.

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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 Education Advisory Committee.

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.

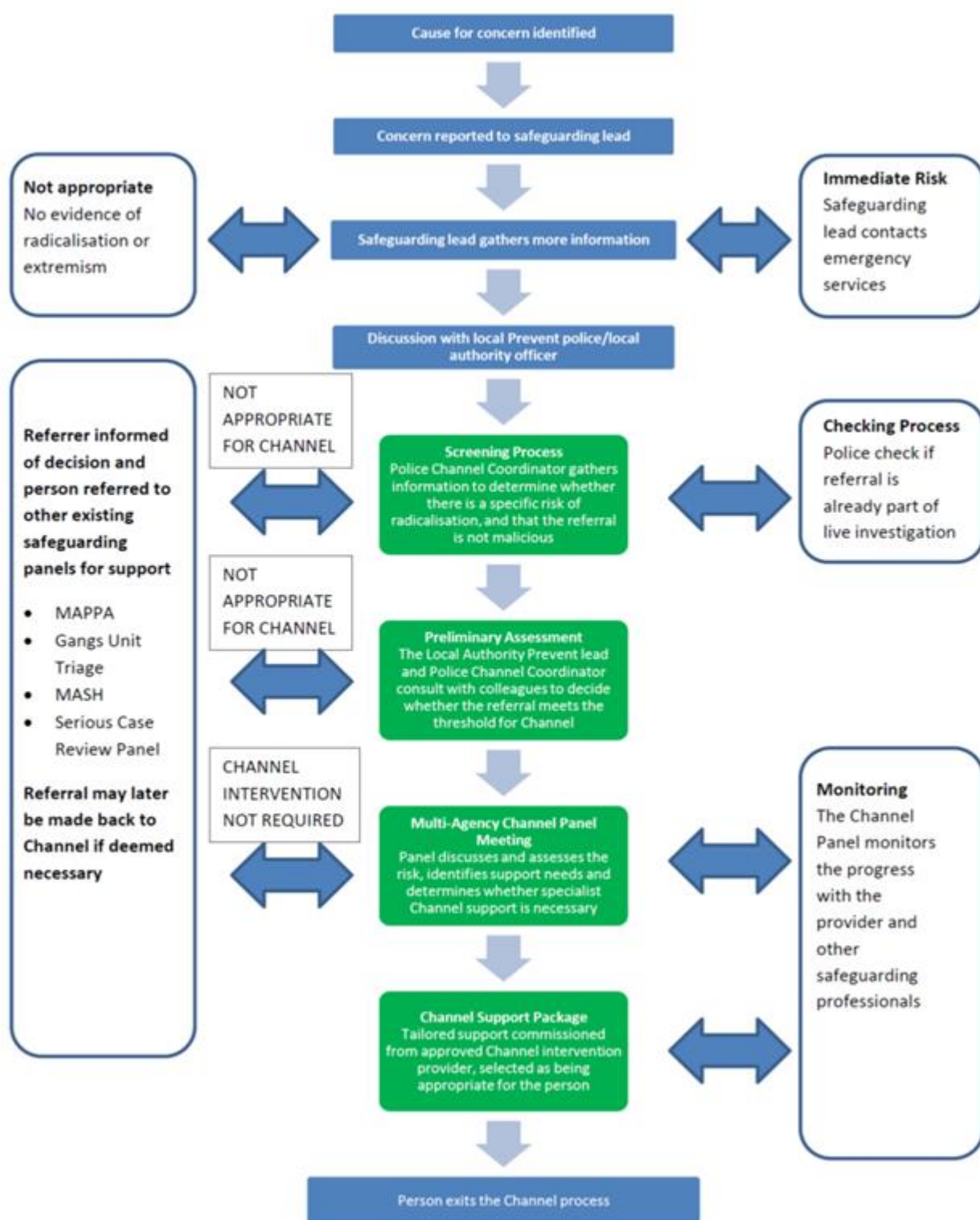
As part of wider safeguarding responsibilities staff will be alert to:

- 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.
- 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.

3.34. Reporting concerns of extremism or radicalisation

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



3.35. Visiting external speakers and events

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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/safeguarded, explanation of EMA's expectations, and whether it is a one off or regular arrangement. The risk assessment 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.

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3.36. 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.

3.37. County Lines

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

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

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

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

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

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

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- 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

3.38. Child Criminal Exploitation (CCE)

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

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

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

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

The following are indicators of CCE; a child:

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

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

3.39. Child Sexual Exploitation (CSE)

EMA recognises that this is a form of child sexual abuse, and that it could occur in the provision.

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.

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

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

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

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

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

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

3.40. Serious Violence

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

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

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

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

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

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

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

3.42. Role of an Appropriate Adult

EMA requires the Designated Safeguarding Lead to be aware of the role of the appropriate adult. The DSL must liaise with the Head of Education to inform him/her of any known issues- especially ongoing

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enquiries under Section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult.

Guidance on this role can be found here: [guidanceappadulscustody.pdf \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/guidanceappadulscustody.pdf)

3.43. 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.

3.44. Guidance on gender questioning children

This policy has been informed by statutory guidance and by draft guidance issued by the Department for Education that was current at the time of writing. Where draft guidance is referenced, this reflects the organisation's commitment to early alignment with developing safeguarding expectations.

This policy will be reviewed and updated promptly upon publication of final statutory guidance to ensure continued compliance with all legal and regulatory requirements.

EMA's approach to this subject will be guided by our statutory safeguarding duties and the principles outlined in Keeping Children Safe in Education (KCSIE) (draft 2026).

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) Decisions will be individual, evidence-informed, recorded, and regularly reviewed, with oversight from the Designated Safeguarding Lead (DSL).

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.

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- 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 may include changes to name, pronouns, uniform or presentation.

In line with draft KCSIE guidance 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 carefully as part of an individual safeguarding assessment.

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.

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- 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.

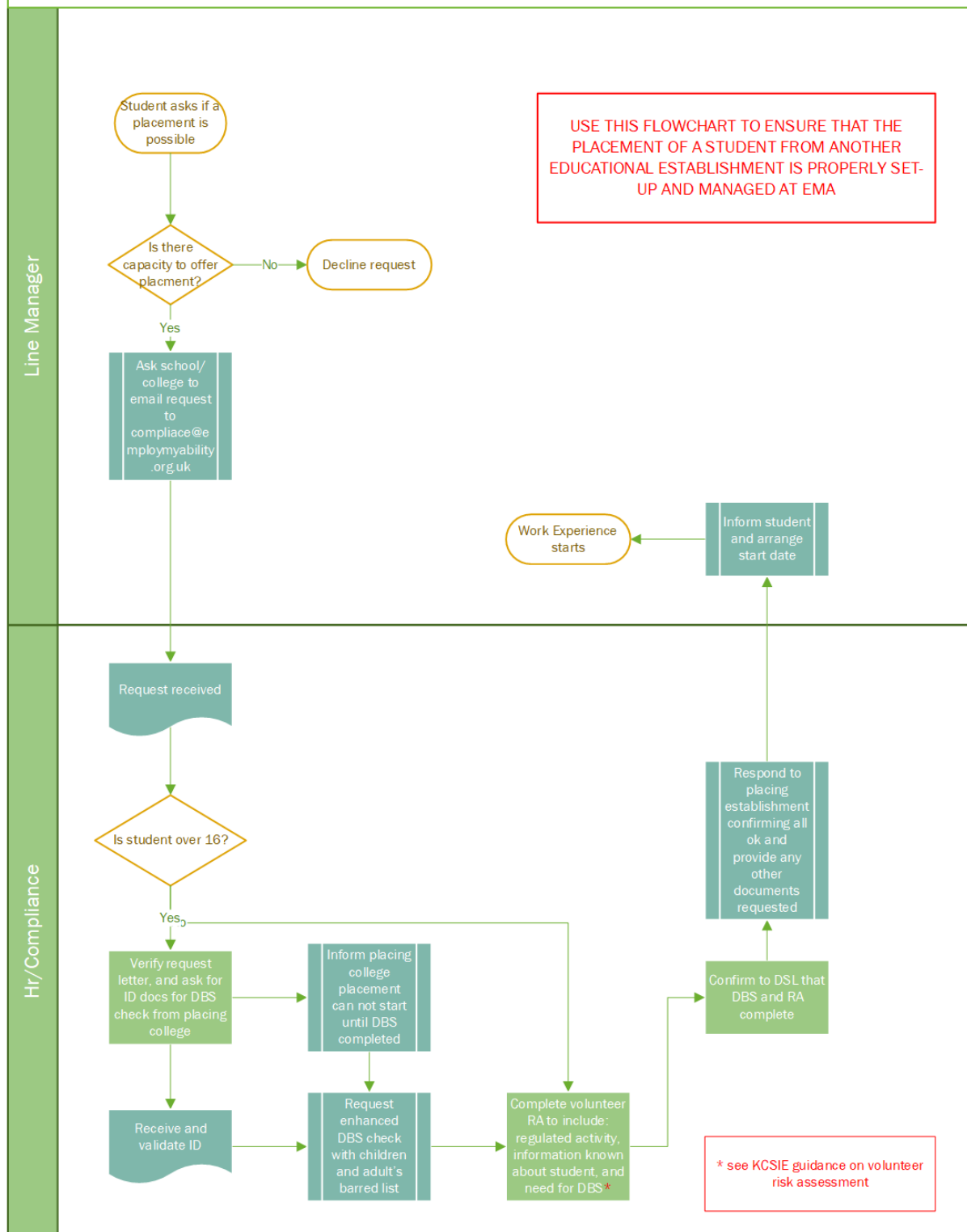
Decisions will be subject to review, particularly where circumstances or risks change.

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

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4. Roles & responsibilities

4.1. Appointment of Designated Safeguarding Leads

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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 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

¹Also Designated Teacher for Looked After Children

²Also a Key Adult for Operation Encompass

4.2. SMT

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

A review of the Single Central Register will be undertaken at every SMT meeting. This will include a check that confirms any new staff member who is engaged in regulated activity, has had the correct documentation (as per KCSIE requirements) verified by the company before starting employment. Fuller details are to be found in the Safer Recruitment Policy.

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.

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

4.3. Designated Safeguarding Lead

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

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

EMA will ensure that the DSL is given the appropriate status and authority within our settings to carry out the duties of the post; They will be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children.

The designated safeguarding lead is responsible for the ownership and update of the single Central Register and will undertake regular checks to ensure its accuracy; these are in addition to the SMT review.

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 *Annex A: Safeguarding information for school and college staff*, from *Keeping Children Safe in Education*.

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. Education Advisory Committee

All Education Advisors 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 Education Advisor will be nominated to lead on safeguarding on behalf of the other board members.

5. Implementation

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

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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		
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Somerset County Council	Duty Officer
0300 123 2224 Email (adults): adults@somerset.gov.uk	
Somerset County Council	Emergency Duty Team out of hours contact
0300 123 23 27	

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

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