EMBS Community College

Safeguarding policy

Reference	POL-201
Version number	v7.0
Owner	Chris Chaundy
Department	Senior leadership team
Review frequency	Annual or when required
Approved by	Chris Chaundy
Approval date	03/08/2026
Classification	Public

Amendment history

Version	Date	Amended by	Reason
v7.0	20/07/2026	Joe Woods, Chris Chaundy, Nazia Kusar & Zahid Bhatti	Rewrite following feedback from audit of safeguarding policy

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1. Scope

This policy sets out EMBS Community College's system for safeguarding and promoting the welfare of children. It primarily applies to current sixth form learners, including those who are over 18, but also makes provision for potential and former learners and vulnerable adult learners where necessary.

All staff acting on behalf of the college are subject to the arrangements set out in this policy, including the board, the principal and vice principal, the senior leadership team, all employees, agency and temporary staff, contractors, volunteers, students on placement, visiting professionals, supply staff and consultants providing services to or on behalf of the college. Everyone has safeguarding responsibilities.

The college applies safeguarding arrangements to all college activities, including teaching and learning, tutorials, enrichment activities, work experience, educational visits, sporting activities, extracurricular activities, online activities, virtual meetings, examinations, enrolment procedures, learner support services, counselling and wellbeing services, and learner transport.

This policy is connected to and operates in conjunction with the college's policies relating to recruitment, learner behaviour, data protection, acceptable use of systems, health and safety, whistleblowing, equality and diversity and the staff handbook.

How to use this policy:

- all staff must follow the arrangements in this policy
- for staff who provide services to learners directly, key safeguarding and welfare information is provided in information boxes where appropriate under each heading
- for those who need more information on the operation of the college's safeguarding processes, additional information beneath these boxes provides management arrangements of particular relevance to the designated safeguarding lead, senior leadership team and specialist staff such as the HR manager, data protection officer and safeguarding casework officers

2. Normative references

All staff must read part one of Keeping Children Safe in Education, statutory guidance published by the Department for Education in 2026 that supersedes the 2025 edition of the same guidance in September 2026.
This policy is intended to support, reflect and apply the requirements of the legislative framework and safeguarding guidance.

2.1. Legislation

The following key pieces of legislation provide the legislative framework for safeguarding:

- the Children Act 1989, which provides the foundation for child protection, establishes principles relating to parental responsibility and child welfare, and places responsibilities on local authorities
- the Education Act 2002, which imposes responsibilities on the college to safeguard and promote the welfare of children and to have regard to statutory guidance
- the Safeguarding Vulnerable Groups Act 2006, which places duties on the college not to let barred individuals work with children, to undertake background and barred list checks, and to make necessary referrals to the Disclosure and Barring Service
- the Counter-Terrorism and Security Act 2015, which places a duty on the college to have regard to the need to prevent people from being drawn into terrorism
- the assimilated UK General Data Protection Regulation
- the Data Protection Act 2018
- the Equality Act 2010
- the Human Rights Act 1998
- the Rehabilitation of Offenders Act 1974

2.2. Guidance

The college's safeguarding arrangements are also intended to support, reflect and apply the requirements of safeguarding guidance:

- Keeping Children Safe in Education 2026 and 2025 published by the Department for Education
- Working Together to Safeguard Children 2026 published by the Department for Education
- Prevent Duty Guidance 2023 published by the Home Office
- Oxfordshire Safeguarding Children Partnership Procedures Manual 2025
- Local guidance and resources provided by Oxfordshire Safeguarding Children Partnership

3. Terms and definitions

The following safeguarding terms are used in this policy and in safeguarding practice. More information on this terminology can be found in Keeping Children Safe in Education.

“abuse”	inflicting harm, including both physical and non-physical harm, as well as the impact of witnessing maltreatment of others; harm can be perpetrated by someone known to the victim or, more rarely, by others; abuse can be perpetrated by an adult or a child
“physical abuse”	inflicting harm including hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child, including fabricating symptoms or deliberately inducing illness
“emotional abuse”	persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child’s emotional development
“sexual abuse”	forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening; this includes contact by penetration or non-penetration, as well as non-contact activities such as looking at sexual images, and can be perpetrated online or using technology
“neglect”	persistent failure to meet a child’s basic physical or psychological needs, likely to result in serious impairment of health or development; can include maternal substance abuse, failure to provide food, clothing and shelter (including exclusion from home), failure to protect from physical or emotional harm, inadequate supervision, failure to provide appropriate medical care, and disregard of emotional needs
“ideology”	a set of social, political, or religious ideas, beliefs, and attitudes that contribute to a person’s worldview
“regulated activity”	any type of paid work for a school or college that involves the opportunity for contact with children, and any paid or unpaid work that involves teaching, training, instructing, caring for or supervising children or providing advice or guidance on wellbeing or driving a vehicle only for children
“vulnerable adult”	a person aged 18 or over with care and support needs who may be unable to protect themselves from abuse

4. Context of the organisation

EMBS Community College primarily provides sixth form education in Oxford and Banbury to learners aged 16 to 19, and also to those aged 14 and 15 and learners up to age 25 with an Education, Health and Care Plan. Many learners at the college have special educational needs and disabilities, come from disadvantaged backgrounds and are looked after or previously looked after. The college also provides adult education in Oxford.

The college and its learners operate in an ever-changing landscape of safeguarding risks. Technological and online developments expose learners to an increasing and complex range of harmful networks and interests. Changes and gaps in the labour market put pressure on the college to be flexible in its recruitment arrangements. Forms of exploitation evolve, cross borders and interact with regulatory changes.

These risks cannot be allowed to prevent the college meeting the expectations of its stakeholders. Learners and families need a learning environment that helps them stay safe in and out of college, online and offline. Staff and job applicants need clear messaging, expectations and training. Social care services, police, healthcare services and local authorities expect strong communication and information sharing practices. Regulators and partners require compliant processes and documentation.

This safeguarding policy is intended to promote ways of working that enable the college to deliver the best outcomes for learners, respond flexibly to a constantly changing set of risks, meet stakeholder expectations and ultimately prioritise learner safety and wellbeing. The college is committed to maintaining ongoing awareness of its organisational context in order to ensure that its safeguarding arrangements remain effective.

5. Leadership

The college board and senior leadership team are committed to safeguarding and protecting the welfare of children. This is recognised as the first priority and shall be integrated into the college's governance, strategy, decision-making, allocation of resources, risk management and organisational culture.

The board and senior leadership team shall promote a safeguarding culture in which children are at the centre, concerns are recognised and reported early and all staff are confident in their safeguarding responsibilities and provided with adequate training appropriate to each role.

The following roles are critical in the management and leadership of safeguarding matters:

- **Designated safeguarding board member**

  A member of the board who oversees its compliance with statutory safeguarding duties

- **Designated safeguarding lead (DSL)**

  A member of the senior leadership team responsible for strategic implementation, monitoring and review of the policy, who takes lead responsibility for safeguarding and child protection, has oversight of all safeguarding concerns and actions and deals with complex safeguarding casework

- **Deputy designated safeguarding lead (DDSL)**

  A member of the senior leadership team or other competent member of staff who can substitute for the DSL in the event of any planned or unplanned absences

- **Safeguarding casework officer**

  A member of staff who deals with safeguarding casework and actions in relation to learners in a specified cohort or location under the supervision and delegation of the DSL

The DSL shall have the authority, competence and organisational independence necessary to fulfil the role. The DSL shall provide safeguarding advice and guidance to staff, manage safeguarding concerns, make referrals to external agencies, maintain safeguarding records, understand learners' views, liaise with safeguarding partners, report on safeguarding performance to the board, principal and senior leadership team, and monitor the effectiveness of safeguarding arrangements.

The DSL shall refer cases of suspected abuse and neglect to children's social care, radicalisation concerns to Prevent and the Channel programme, dismissals or exits due to risk/harm to a child to the Disclosure and Barring Service, and crimes to the police.

The DSL or DDSL shall be available at all times during college hours, and shall make joint arrangements to ensure that safeguarding concerns can be reported, recorded and addressed regardless of staff availability.

6. Planning

The college takes a whole-college approach to safeguarding, where all staff, departments, functions and projects embed safeguarding and promotion of the welfare of children as an essential part of their work.		
The college proactively identifies, assesses and manages risks to its ability to safeguard learners from physical, emotional and sexual abuse and neglect.		
Risks to effective safeguarding:	*Vulnerable learners:*	*Categories of abuse:*
1. all forms of abuse and neglect 2. technology and the internet 3. radicalisation and extremism 4. harmful relationships with peers, family or staff 5. extra-familial context and exploitation 6. discrimination 7. absence from education 8. work placements and employment 9. regulatory changes 10. staffing levels 11. recruitment of unsuitable candidates	1. learners aged 14 to 16 2. learners with special educational needs, disabilities or health issues 3. learners who are absent from education 4. learners who need a social worker 5. learners who are or were subject to a care order or voluntarily accommodated by the local authority 6. learners who are homeless or at risk of homelessness 7. learners who have a parent in custody 8. learners who need mental health support 9. young carers 10. asylum seekers and refugees 11. vulnerable adult learners	1. peer abuse (child-on-child abuse) 2. child sexual exploitation 3. child criminal exploitation 4. domestic abuse 5. harmful sexual behaviour 6. online and technologically enabled abuse 7. honour-based abuse 8. female genital mutilation 9. forced marriage 10. radicalisation and extremism 11. modern slavery and human trafficking 12. serious violence 13. bullying 14. discriminatory abuse

The DSL shall set safeguarding objectives, which may relate to safeguarding training completion rates, timeliness of safeguarding actions or referrals, improving learner awareness of safeguarding arrangements and improving audit outcomes. Objectives shall be measurable and the extent to which they have been met shall be tracked over time and improvements made.

7. Support

7.1. Resources

The college shall provide adequate resources to ensure the implementation and operation of effective safeguarding arrangements. Such resources shall include:

- sufficient numbers of trained safeguarding personnel, in particular the DSL, DDSL, and safeguarding casework officers
- sufficient general staffing levels to facilitate effective safeguarding practices
- sufficient financial resources allocated to safeguarding objectives and processes
- suitable facilities for confidential meetings
- secure systems for reporting, recording and managing safeguarding concerns
- access to specialist advice where necessary

7.2. Training and competence

The college shall ensure that staff performing safeguarding-related duties are competent on the basis of education, experience and training. DSLs and DDSLs shall receive equivalent levels of training, including Level 3 specialist safeguarding training.

All staff shall receive safeguarding training during induction, and annual updated safeguarding training. This shall include training in awareness of online safety and training in the overlaps between multiple forms of harm. The DSL shall make use of the single central record (section 8.11.2) to monitor any gaps in safeguarding training completion and address them as soon as possible. The DSL shall make arrangements for such ongoing communications and updates as are considered necessary to assist staff in fulfilling their safeguarding responsibilities effectively.

7.3. Management of records

The college shall maintain accurate, secure and timely safeguarding records to support safeguarding, enable effective decision-making, facilitate information sharing with relevant agencies, provide continuity across personnel changes, provide evidence and meet regulatory requirements.

Safeguarding records include all concerns, records, documentation, plans and communications related to safeguarding and welfare of learners. Safeguarding records must be factual, objective, recorded as soon as possible, include dates and times, identify the author, use the child's own words, avoid speculation and record actions taken.

The DSL shall oversee all safeguarding records and permit to senior leaders and safeguarding casework officers such access as is required in order for them to fulfil specific delegated safeguarding actions. Where necessary to safeguard a learner, the DSL shall share safeguarding records externally with children's social care, police, health professionals, the local authority, Channel panels, other education providers, regulators and other relevant agencies where appropriate.

The DSL and data protection officer shall ensure that safeguarding records are confidential, maintained separately from administrative records, access controlled and monitored, not shared insecurely or without lawful purpose or basis, and processed in accordance with data protection law. Secure methods of storage, encryption and backups shall be used for electronic records. Physical security shall be maintained for all paper records.

The DSL and data protection officer shall ensure that safeguarding records are retained in accordance with data protection law and safeguarding guidance and that data retention periods are specified in a data retention schedule. Records whose retention period has expired and for which there is no lawful purpose or basis for retention shall be securely destroyed.

The DSL and data protection officer shall periodically review safeguarding records to ensure they are complete, accurate, up-to-date, securely stored and disposed of where appropriate. All data subject requests shall be processed such as to balance data subject rights with the need to safeguard children.

8. Operation

8.1. Multi-agency safeguarding arrangements

Learners require partnership and cooperation between organisations they interact with for their safeguarding needs to be met effectively.		
Most of the college's learners live in Oxfordshire and multi-agency safeguarding arrangements relevant to them are led by the Oxfordshire Safeguarding Children Partnership.		
Multi-agency safeguarding arrangements:	*Oxfordshire Safeguarding Children Partnership:*	*Key services:*
1. making arrangements for information about learners and their families to be shared with relevant agencies where appropriate and in accordance with data protection law 2. jointly with relevant agencies, cooperating to identify and understand indicators that learners are experiencing or at risk of harm 3. coordinating with relevant agencies to ensure provision of targeted support	1. Oxfordshire County Council 2. Thames Valley Integrated Care Board (formerly Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board) 3. Thames Valley Police	1. Oxfordshire Multi-Agency Safeguarding Hub (MASH) for children's social care referrals 2. Locality and Community Support Service (LCSS) for named consultations about learners and support with family help 3. Local Authority Designated Officer (LADO) for concerns about staff 4. Oxfordshire Safeguarding Adults Board (OSAB) for adult safeguarding 5. Some of the college's learners live outside of Oxfordshire for whom multi-agency safeguarding arrangements will involve different organisations, for example Northamptonshire Safeguarding Children Partnership

8.2. Reporting, recording and referring concerns

Any staff member who believes that a learner is in immediate danger must call 999 and report the situation to the police.		
Any staff member who has any concern about a learner's welfare must immediately report the concern to the DSL, and then record it on the learner journey form. The DSL will then take one of the three actions in the table below.		
Internal support:	*Family support:*	*Referral to children's social care:*
1. managing support for the learner internally via the college's own support services 2. considering whether doing so does not place the learner at additional risk 3. considering whether the learner's family should be informed in the interests of the learner's wellbeing	1. carrying out a family help assessment with the consent of the learner's family 2. coordinating with relevant agencies such as parenting support, mental health support, domestic abuse services, youth services, youth offending teams and housing and employment services	1. if the learner is suffering or is likely to suffer harm, making a referral to local authority children's social care, and if appropriate the police

The DSL shall ensure that all reported concerns are recorded in writing. The DSL shall review these records from time to time and identify any patterns that may indicate hidden forms of abuse or neglect. Where such a pattern is identified, the DSL shall consider referral to children's social care. The DSL should also seek to address any organisational culture issues that may have contributed to the pattern.

8.3. Online safety

All staff must be aware of the four categories of online harm: content, contact, conduct and commerce.		
The college is required to implement systems that protect learners from illegal, inappropriate or harmful content, including content filtering, monitoring of user activity, and cyber security.		
Four categories of online harm:	*Filtering and monitoring responsibilities:*	*Cyber security requirements:*
1. **content** – illegal, inappropriate or harmful content including pornography, racism, violence and disinformation 2. **contact** – harmful online interaction with other users or chatbots, including grooming for exploitation 3. **conduct** – harmful or risky behaviour including making, sending, receiving and artificially generating explicit images, and cyberbullying 4. **commerce** – licit or illicit markets including gambling, cryptocurrency, advertising, phishing and scams	1. assigning roles and responsibilities to manage filtering and monitoring 2. reviewing filtering and monitoring arrangements at least annually 3. blocking harmful and inappropriate content without unreasonably impacting teaching and learning 4. having monitoring strategies that meet the college's safeguarding needs	1. cyber risk assessment and annual review 2. cyber awareness plan 3. anti-malware and firewall 4. controlled and secure user accounts and privileges 5. licensed and updated technology 6. backup plans and annual review 7. reporting cyber attacks

The board and a designated member of the senior leadership team shall carry out data protection impact assessments for the filtering and monitoring arrangements and ensure that they reflect and address the specific risks and needs of the college

College IT support shall maintain, report on and implement actions in relation to these systems.

The college shall communicate acceptable use requirements for all college system users.

The college shall incorporate into the curriculum age-appropriate education on online risks and support learners in developing their ability to keep themselves safe while using online systems. The college shall promote a culture of awareness and openness and encourage those who have been subjected to online harm to seek help.

8.4. Peer abuse (child-on-child abuse)

Any situation in which a learner is harmed or is likely to be harmed must be treated as abuse and must not be dismissed or tolerated due to the perpetrator being a peer of the victim.		
All staff must be willing to challenge abuse between learners, actively promote safe spaces for learners, and provide support to victims, perpetrators and other learners involved.		
Forms of peer abuse:	*When peer abuse is more likely:*	*Use of force to restrain learners:*
1. bullying, including cyberbullying and discriminatory abuse 2. abuse in intimate personal relationships 3. physical abuse 4. use of weapons to harm or threaten 5. harmful sexual behaviour 6. making, sending, receiving and artificially generating explicit images including nudes and semi-nudes 7. non-consensual sexual activity 8. upskirting (taking a picture under someone's clothing without consent) 9. violent rituals	1. at particular times: just before and just after college 2. in particular locations: common rooms, bathrooms and secluded areas 3. against vulnerable learners, especially when groups are mixed, such as younger learners with older learners 4. when there is limited supervision 5. when previous instances of abuse have gone unchallenged	1. in limited circumstances reasonable force (physical contact) may be used to safeguard learners 2. reasonable force must be proportionate, using no more force than is necessary for the least amount of time 3. disciplinary action in relation to staff who have used physical contact in behaviour management will take into account the proportionality of the physical contact used

The DSL shall make arrangements for:

- provision of displays, assemblies and classroom activities to all learners that promote to them their right not to be abused, the methods and staff available to report abuse, and that their concerns will be treated seriously
- anti-bullying campaigns that address bullying, including cyberbullying, prejudice and discriminatory abuse as well as all forms of physical abuse and threats
- promotion of a culture that seeks to eliminate violence against women and girls
- measures to protect learners from serious violence such as physical assault, bullying and use of weapons, including the use of safety and support plans where warranted by the level of risk and providing training on de-escalation of peer conflict

- awareness campaigns of online and technologically enabled harms, including upskirting and making, sending, receiving and artificially generating explicit images including nudes and semi-nudes
- provision of resources to counter misinformation, conspiracy theories, hazards of artificial intelligence and harmful and radicalising online communities
- detection and elimination of violent hazing rituals
- implementation of individual behaviour plans or individual risk assessments where appropriate to reduce the occurrence of challenging behaviour
- risk assessment of situations where vulnerable learners are mixed with other learners, in particular when younger learners are mixed with older learners, and controls to protect the vulnerable learners in these situations

8.5. Community safety

Safeguarding and welfare issues in a learner's life outside of home or college must be reported and recorded in accordance with this policy.		
All staff must be vigilant of unfamiliar people loitering around learners and engaging them in conversation, including around college premises and on trips.		
General indicators of exploitation:	*Indicators of child sexual exploitation:*	*Indicators of drug gangs and organised crime networks:*
1. unexplained gifts, money or new possessions 2. association with others who are involved in exploitation, as perpetrators or victims 3. changes in emotional wellbeing 4. misuse of alcohol and other drugs 5. absence from education, going missing for long periods or regularly coming home late 6. overlapping harms, for example combinations of online harm, grooming, exploitation, radicalisation and physical abuse	1. having older boyfriends or girlfriends 2. having sexually transmitted infections 3. displaying sexual behaviours beyond expected sexual development 4. becoming pregnant	1. being found away from home 2. being involved in serious violence such as knife crime 3. receiving requests for drugs, moving drugs and collecting money for drugs 4. knowing or using methods to conceal drugs 5. being in accommodation they have no connection with, such as hotel rooms or houses with drug activity inside or nearby 6. owing debts 7. having bank accounts used by others or for drug dealing

The DSL shall make arrangements for:

- general interventions designed to make learners more confident, aware of their rights and able to seek help
- general interventions designed to promote anti-discriminatory and anti-racist safeguarding practices and sensitivity to ethnicity, economic deprivation and disability
- specific interventions to support learners who are or may be victims of abuse perpetrated by individuals outside the home, including by understanding the broader systems that influence learners and making use of contextual safeguarding resources such as genograms and ecomaps
- specific interventions to support learners who are or may be victims of modern slavery, including support with referral under the National Referral Mechanism via the police or other designated first responder organisation

8.6. Home & family

Children who see, hear or experience the effects of domestic abuse are legally recognised as victims in their own right.		
All staff must be aware of the possible connections between homelessness, absence from education and various forms of abuse or neglect.		
Forms of domestic abuse:	*Factors associated with homelessness:*	*Risks associated with absence from education:*
1. physical abuse 2. emotional abuse 3. sexual abuse 4. economic abuse 5. coercive and controlling behaviour 6. seeing, hearing or experiencing the effects of abuse as a child	1. household debt 2. anti-social behaviour 3. eviction 4. overcrowding 5. misuse of alcohol and other drugs 6. difficulty accessing health services	1. mental health problems 2. misuse of alcohol and other drugs 3. travelling to conflict zones 4. female genital mutilation 5. honour or faith-based abuse 6. forced marriage

The DSL shall make arrangements for:

- specific interventions for learners in relation to whom the college has received a notification that they may be a victim of domestic abuse
- specific interventions for learners at risk of homelessness including both referral to children's social care and referral to the local housing authority
- specific interventions for learners who are frequently absent from education with resources, support and education that is more accessible to them, including suitable methods to report abuse

8.7. Harmful sexual behaviour

All staff must be able to distinguish between developmentally typical sexual behaviour, problematic non-abusive sexual behaviour, and harmful abusive sexual behaviour. All problematic and harmful sexual behaviour must be challenged.		
Harmful sexual behaviour is common, often tolerated and under-reported.		
Continuum of sexual behaviour:	*Possible components:*	*Sexual harassment:*
1. **normal** – developmentally expected, socially acceptable, consensual 2. **inappropriate** – single instances of inappropriate behaviour that may be appropriate in other contexts 3. **problematic** – developmentally unusual, unexpected, consensually unclear, possible compulsivity or power imbalance 4. **abusive** – victimising, misuse of power, intrusive, coercive, not consensual, expressive violence 5. **violent** – physical violence, highly intrusive, sadistic instrumental violence which is arousing to the perpetrator	1. misogyny as an escalatory factor 2. physical assaults such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts 3. sharing of nude or semi-nude images, which always requires a proportionate safeguarding response regardless of consent 4. significant age difference as an indicator of harmful sexual behaviour 5. perpetrators who may have experienced their own abuse and trauma and require support 6. failure to challenge leading to normalisation and culture of tolerance	1. sexual comments, stories, remarks about clothing or appearance 2. sexual jokes or taunting 3. physical intrusion, brushing against someone deliberately or interfering with someone's clothes 4. displaying pictures of a sexual nature 5. upskirting 6. online sexual harassment, sharing of nudes or semi-nudes, sharing explicit content, sexualised bullying, unwanted sexual messages, sexual exploitation, coercion and threats

The DSL shall make arrangements for:

- general interventions designed to promote consent and healthy relationships and awareness of harmful sexual behaviour
- specific interventions for learners who have experienced, may have experienced and may be experiencing sexual violence, sexual harassment and non-consensual sexual activity including upskirting

8.8. Cybercrime

Learners with skills and interest in computing and technology may stray into crime committed using computers and/or the internet.		
The Computer Misuse Act 1990 establishes the following criminal offences relating to computers.		
Unauthorised access to computer material:	*Unauthorised access with intent to commit further offences:*	*Unauthorised acts with intent to impair the operation of a computer:*
1. for example, watching a friend entering their username and password, then logging in without their permission to read their private messages	1. for example, using a teacher's personal device to access their online shopping account and buy items with their payment information	1. for example, using a "distributed denial of service" attack to disable a website

The DSL shall make arrangements for:

- general interventions designed to promote positive use of computer skills and awareness of crimes under the Computer Misuse Act 1990
- specific interventions for learners who may be drawn into cyber crime, using the National Crime Agency Cyber Choices programme

8.9. Honour or faith-based abuse

All forms of honour or faith-based abuse are abuse regardless of the intent or motivation and must be reported and recorded in accordance with this policy.		
Abuse committed in the context of preserving honour often involves a wider network of family or community pressure and may involve multiple perpetrators.		
Examples:	*Teachers' legal duties:*	*Forced marriage offence:*
1. female genital mutilation 2. forced marriage 3. breast ironing 4. physical punishment such as acid attacks 5. domestic imprisonment 6. abduction 7. sexual violence 8. murder	1. teachers are under a legal duty to personally report to the police where they discover that female genital mutilation appears to have been carried out on a girl under 18 2. this duty does not apply to suspected cases which should be reported and recorded in accordance with this policy	1. it is illegal to use pressure or abuse to force someone to marry 2. it is illegal to do anything intended to cause someone under 18 to marry, even if there is no coercion, pressure or abuse 3. it is illegal to take someone overseas to force them to marry, even if the forced marriage does not take place

The DSL shall make arrangements for:

- general interventions designed to promote awareness of honour-based abuse
- specific interventions for learners who may have been subjected to or may be vulnerable to honour-based abuse

8.10. Adults working with children

Any staff member with a concern or allegation relating to another staff member (including external staff) must report the concern directly to the DSL, or DDSL if the concern relates to the DSL. The learner journey form should not be used.		
Adults working with children are in a position of authority, trust and imbalance of power, which comes with higher standards and responsibilities. All staff must maintain professional and appropriate relationships with learners.		
Professional relationships:	*Concerns that meet the harm threshold:*	*Low-level concerns:*
1. staff are prohibited from having private, personal, secret, romantic or sexual relationships with learners 2. this applies to all current learners, former sixth form learners whose last day was less than two years ago, former sixth form learners who are under 20 years old, and vulnerable adult learners 3. staff are prohibited from making or accepting social media requests from such learners or keeping their contact details on any personal device 4. this does not apply to staff who have a legitimate previous relationship with a learner, such as family members 5. if a staff member has to contact a learner outside of working hours, such contact shall be notified to the staff member's line manager and the DSL as soon as possible	1. these are situations where it is alleged or suspected that a member of staff has: 2. harmed a child, or may have harmed a child 3. committed a criminal offence against a child, or may have committed a criminal offence against a child 4. behaved towards a child in a way that indicates they may pose a risk of harm to children 5. behaved towards a child in a way that indicates they may not be suitable to work with children	1. this term refers to concerns relating to staff that do not meet the harm threshold but indicate a failure to meet the college's expected standards 2. examples include being over-friendly with a learner, humiliating a learner, or general erosion of professional boundaries with a learner 3. boundary infringements are sometimes part of a grooming process, but at other times are made innocently and with good intention 4. they should nevertheless be avoided, reported and corrected using timely, sensitive and proportionate interventions 5. the college aims to promote a culture of openness, transparency and self-reporting in the interests of good safeguarding practice

8.11.1. Concerns relating to staff that meet the harm threshold

Immediately upon being notified of a concern that meets the harm threshold, the DSL shall:

- ensure the learner is not at risk
- record in writing the information provided, where possible in the learner's own words, including date, time and place of incident, persons present and what was said
- refer the matter to the Local Authority Designated Officer (LADO) within one working day to discuss the nature, content and context of the concern and agree a course of action

The DSL shall follow the OSCP Procedures Manual chapter Allegations Against Staff or Volunteers and the relevant section of Keeping Children Safe in Education, act on the advice of the LADO in all matters and cooperate with the police and children's social care.

In the event that the LADO determines that a referral to children's social care is necessary, strategy meetings will be convened and the outcome will be one of the following:

- **substantiated** – there is sufficient evidence to prove the allegation
- **malicious** – there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- **false** – there is sufficient evidence to disprove the allegation
- **unsubstantiated** – there is insufficient evidence to either prove or disprove the allegation
- **unfounded** – there is no evidence or proper basis to support the allegation

The outcome of any investigations shall be factored into any disciplinary action and decision to refer to the Disclosure and Barring Service in accordance with the college's legal obligations.

8.11.2. Concerns relating to staff that do not meet the harm threshold (low-level concerns)

The DSL shall record all low-level concerns in writing. The DSL shall review these records from time to time and identify any patterns of concerning behaviour. Where such a pattern is identified, the DSL shall consider disciplinary actions and referral to the LADO as a broader concern that meets the harm threshold. The DSL should also seek to address any organisational culture issues that may have contributed to the pattern.

The DSL and HR department shall ensure that the college's approach to low-level concerns as contained in this policy is reflected in the college's staff handbook, and that standards of staff behaviour in relation to professional boundaries with learners are reinforced by the handbook. The DSL and HR department shall ensure that low-level concerns are not included in references for job applications unless they relate to issues which would normally be included in a reference, such as misconduct.

The DSL shall discuss all reported low-level concerns with the principal who shall make the ultimate decision of what action should be taken in response. The DSL shall report any reported low-level concerns that relate to external staff such as contractors to their employers.

8.11. Safer recruitment

The college is committed to preventing and deterring unsuitable individuals from applying to work with learners. Safeguarding shall be embedded in recruitment, selection, appointment, induction and ongoing employment arrangements.

8.11.1. Recruitment and selection

The DSL and HR department shall ensure that the following processes are incorporated into all recruitment and selection operations:

- **job descriptions and person specifications** that include safeguarding requirements, responsibilities and commitments
- **application forms** that make sufficient references to the college's safeguarding policy, disclosure and barring, regulated activity and related offences
- **shortlisting of multiple candidates** with a requirement for shortlisted candidates to complete criminal record self-declarations, exploration of concerns and gaps in employment history and social media reviews
- **obtaining valid references** directly by the college that provide satisfactory facts confirming suitability for working with children
- **interviews** that involve structured questions agreed in advance that enable exploration of motivation for working with children, experience working with children and opportunities to probe gaps in employment or other concerns

8.11.2. Vetting

The DSL and HR department shall ensure that any offer of employment is conditional upon the following processes:

- identity verification
- enhanced criminal background check including children's barred list
- verification of the candidate's mental and physical fitness to carry out their work responsibilities
- verification of the candidate's right to work in the UK
- verification of professional qualifications
- verification that a candidate for a role that involves teaching is not subject to a teaching prohibition order or interim prohibition order

The DSL and HR department shall ensure that a register (single central record) is kept in relation to all staff that records whether the following checks have been made for each of them:

- identity verification
- enhanced criminal background check including children's barred list check, or standalone children's barred list check where applicable
- prohibition from teaching check
- further checks on people who have lived or worked outside the UK where applicable
- verification of professional qualifications where applicable
- verification of the candidate's right to work in the UK

- whether the staff member's role involves regularly caring for, training, supervising or being solely in charge of persons aged under 18
- dates on which the staff member completed or undertook safeguarding training

The DSL and HR department shall ensure that a staff member's entry on the single central record is removed once they stop working at the college. The DSL and HR department shall ensure that copies of documents used to verify successful candidates' identity, right to work and qualifications are retained in their personnel file. The DSL and HR department shall ensure that certificates or copies thereof provided by the Disclosure and Barring Service are retained for no longer than is necessary to make a recruitment or other relevant decision

The DSL and HR department shall make such checks on job applicants who have lived or worked outside the UK as are necessary to ensure that they receive the same level of scrutiny as other candidates.

The DSL and HR department shall ensure that contractors are subject to appropriate contractual safeguarding requirements and that enhanced criminal background checks including children's barred list checks are obtained for contractors who will engage in regulated activity relating to children. For other contractors who may be in regular contact with children, an enhanced criminal background check shall be obtained.

The DSL and HR department shall ensure that professional visitors' identity cards are checked and shall verify that the visitors' employers have obtained the appropriate criminal background and barred list checks.

The DSL and HR department shall obtain enhanced criminal background checks including children's barred list checks for volunteers engaging in regulated activity.

8.11.3. Ongoing safer recruitment

The DSL shall ensure that a referral is made to the Disclosure and Barring Service in cases where an individual is removed from regulated activity, or would have been if they had not stopped working, and they believe one of the following conditions applies:

- the individual has engaged in relevant conduct in relation to children and/or adults
- the individual has satisfied the harm test in relation to children and/or vulnerable adults
- the individual has been cautioned or convicted of a relevant (automatic barring) offence

The DSL shall consider whether to refer the case to the Secretary of State in cases where an individual is removed from teaching because of serious misconduct, or would have been if they had not stopped working.

8.12. Preventing radicalisation

All staff must use their judgement in identifying learners who may be at risk of radicalisation and report and record any concerns in accordance with this policy.		
All staff must complete induction training and annual updated training on the purpose of Prevent, susceptibility and vulnerability, radicalisation, terrorism and the “notice, check, share” procedure.		
Extremism:	*Radicalisation:*	*Terrorism:*
1. promotion or advancement of an ideology based on violence, hatred or intolerance that aims to: 2. negate or destroy the fundamental rights and freedoms of others, or 3. undermine, overturn or replace the UK’s system of liberal parliamentary democracy and democratic rights, or 4. intentionally create a permissive environment for others to do one of the above	1. process of legitimisation of support for, or use of, terrorist violence	1. endangering or causing serious violence to a person or people, causing serious damage to property, or seriously interfering with or disrupting an electronic system, in order to influence the government or intimidate the public for the purpose of advancing a political, religious or ideological cause

The DSL shall make arrangements for:

- general interventions designed to promote respect for fundamental rights, freedoms and values
- specific interventions for learners to be referred to Prevent and supported via Channel panels where necessary

9. Performance evaluation

The DSL shall monitor the effectiveness of safeguarding arrangements. This monitoring shall take account of:

- number and nature of safeguarding concerns
- referrals to external agencies
- use of family help and related resources
- concerns relating to staff
- patterns in safeguarding incidents

This monitoring shall assess:

- timeliness of responses to safeguarding concerns and ongoing safeguarding actions
- training completion rates
- compliance with regulations and guidance, including referrals, record-keeping and scheduled policy reviews

The DSL shall establish methods of gathering staff feedback on the effectiveness of the college's safeguarding arrangements.

10. Improvement

The college shall review this policy and the college's safeguarding arrangements annually and whenever necessary in response to changes in the matters to which it relates. The college shall take a systemic approach to safeguarding improvement, and shall operate its safeguarding arrangements according to the principle of continuous improvement.

The DSL shall ensure that the college pursues continuous improvement as an ongoing process in safeguarding practice by advancing safeguarding culture, strengthening partnerships, enhancing staff competence, taking advantage of technological developments, providing training that addresses identified gaps in competency, and learning from incidents and reviews.

Appendix – contacts

OSCP MASH	0345 050 7666 https://www.oscp.org.uk/concerned-about-a-child/
OSCP LADO	lado.safeguardingchildren@oxfordshire.gov.uk 01865 810603
LCSS	lcss@oxfordshire.gov.uk 03452 412705 07827 947300 (Banbury link worker) 07789 924659 (Oxford link worker)
Adult safeguarding	01865 328232 (triage for potential adult safeguarding issues) https://www.osab.co.uk/ (Oxfordshire Safeguarding Adults Board with link to Oxfordshire County Council adult safeguarding concern report form)
Zahid Bhatti (principal)	zahid@embs.ac.uk 07737 825476
Chris Chaundy (DSL)	chris@embs.ac.uk 07737 873646