

# SAFEGUARDING & CHILD PROTECTION POLICY

<b>Policy Name</b>	<b>Safeguarding and Child Protection</b>
<b>Site</b>	<b>Birmingham</b>
<b>Version</b>	<b>1.0</b>
<b>Approved By</b>	<b>Director / DSL</b>
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## SECTION 1: POLICY DETAILS, INTRODUCTION & LEGAL FRAMEWORK

### 1.1 Policy Statement

Empowering Futures Alternative Provision is fully committed to safeguarding and promoting the welfare of children, young people, and adults at risk. We recognise that safeguarding is an overarching responsibility shared by all members of staff, contractors, volunteers, and partner organisations. Our approach is proactive, preventative, and guided by statutory guidance, ensuring that all learners accessing Empowering Futures, whether face-to-face, online, or through satellite delivery models, are safe, supported, and protected from harm.

We maintain a safeguarding culture in which:

- The welfare of the learner is paramount.
- All learners have the right to protection from harm, abuse, exploitation, neglect and discrimination.
- Safeguarding procedures are rigorous, timely, and consistently applied.
- All staff are appropriately trained and understand their responsibilities.
- Concerns are recorded accurately and escalated without delay.
- Multi-agency working is central to achieving the best possible outcomes.

This policy outlines the organisational framework, safeguarding responsibilities, and procedures that ensure Empowering Futures meets its statutory duties and regulatory expectations when delivering alternative education programmes, adult courses, and online provision.

## 1.2 Scope of the Policy

This policy applies to all:

- Children aged 5–18 who access Empowering Futures programmes
- Adult learners (18+) enrolled on accredited or non-accredited provision
- Learners with SEND, regardless of delivery model (1:1, small group, in-centre, satellite site, online)
- Staff, tutors, contractors, volunteers, visiting professionals, and external placement supervisors
- All activity delivered under the Empowering Futures brand including vocational training in hair, beauty, nails, sports, fitness, customer service and off-site practical learning

The policy covers all locations where Empowering Futures operates, including:

- Coventry (main hub)
- Walsall and Birmingham satellite delivery areas
- Any approved temporary or community-based premises
- Online and remote alternative provision
- Off-site venues where learners undertake supervised activities

## 1.3 Safeguarding Objectives

Empowering Futures aims to:

1. Protect all learners from maltreatment, abuse, neglect, exploitation and radicalisation.
2. Promote safe, emotionally supportive learning environments.
3. Prevent impairment of learners' mental and physical health or development.
4. Identify early signs of vulnerability and intervene swiftly through Early Help or statutory referral.
5. Provide clear, robust procedures for reporting, recording and escalating concerns.
6. Ensure all staff understand their safeguarding responsibilities and receive annual training.
7. Embed safeguarding principles into all delivery areas including online learning and vocational practice.
8. Establish strong partnerships with Coventry, Walsall and Birmingham safeguarding agencies.
9. Ensure safe systems for online learning, remote engagement and digital communication.

10. Promote safeguarding awareness among learners and parents/carers.

## **1.4 Legal and Statutory Framework**

This policy is written in accordance with the following legislation and statutory guidance:

### **Children and Young People (Under 18)**

- Keeping Children Safe in Education (KCSIE) 2025
- Working Together to Safeguard Children (2023)
- Children Act 1989 and 2004
- Education Act 2002 (Section 175)
- Counter-Terrorism and Security Act 2015 (Prevent Duty)
- Serious Violence Duty (Police, Crime, Sentencing and Courts Act 2022)
- Sexual Offences Act 2003
- Domestic Abuse Act 2021
- Equality Act 2010
- UK GDPR and Data Protection Act 2018

### **Adults at Risk (18+)**

- Care Act 2014
- Mental Capacity Act 2005
- Safeguarding Vulnerable Groups Act 2006
- Human Rights Act 1998
- Prevent Duty (where applicable)

### **Local Safeguarding Partnership Procedures**

This policy incorporates and adheres to local procedures outlined by:

- **Coventry Safeguarding Children Partnership (CSCP)**
- **Walsall Safeguarding Partnership**
- **Birmingham Children's Trust / Birmingham Safeguarding Partnership**
- Adult Social Care safeguarding procedures for the same LAs

Where discrepancies occur, statutory guidance and local partnership procedures take precedence.

## **1.5 Definitions**

### **Child**

Any person under the age of 18.

### **Adult at Risk**

A person aged 18 or over who:

- Has needs for care and support;
- Is experiencing or at risk of abuse or neglect; and

- Is unable to protect themselves from harm due to their needs.

## **Safeguarding**

Actions taken to promote the welfare of children, young people, and adults at risk to protect them from harm.

### **Child Protection**

Actions taken to protect a child who is suffering, or is likely to suffer, significant

harm. **Significant Harm**

Serious physical, emotional or sexual harm, or persistent neglect affecting development.

## **1.6 Safeguarding Structure within Empowering Futures**

### **Lead DSL**

#### **Rhean White (Director)**

Responsible for overall safeguarding oversight, strategic leadership, Prevent, online safety, referrals and multi-agency liaison.

### **DSL**

#### **Rena Sparks (Manager)**

Responsible for operational safeguarding, attendance safeguarding, learner support, online AP oversight and daily case management.

Details held within the staff directory and the Single Central Record.

A DSL or Deputy DSL is available **at all times** while learners are engaged in:

- In-centre learning
- Satellite or community-based delivery
- Off-site vocational sessions
- Online and remote AP sessions

This includes remote availability during operational hours across different locations.

## **1.7 Multi-Agency Working**

Empowering Futures actively works with:

- Coventry MASH
- Walsall MASH
- Birmingham Children's Advice & Support Service (CASS)
- Local Authority Designated Officers (LADOs)
- Police (999/101)
- Adult Social Care teams

- Prevent/CTU teams
- Schools, Virtual Schools, Social Workers and SEND teams
- Health professionals including CAMHS, School Nursing and GP services We share

information lawfully, securely and in line with UK GDPR to safeguard learners.

## 1.8 Policy Review

The policy will be reviewed annually or sooner if:

- There are significant changes in legislation or statutory guidance
- Local authority safeguarding procedures are updated
- Operational changes require policy amendments
- A safeguarding incident indicates a need for review

The review will be authorised by the Director.

# SECTION 2: DESIGNATED SAFEGUARDING LEADS, GOVERNANCE & ORGANISATIONAL RESPONSIBILITIES

## 2.1 Safeguarding Leadership Structure

Empowering Futures Alternative Provision maintains a clear and robust safeguarding leadership framework to ensure that concerns are responded to promptly and appropriately. The safeguarding structure consists of:

### **Lead Designated Safeguarding Lead (Lead DSL)**

**Rhean White, Director**

The Lead DSL maintains overall strategic responsibility for safeguarding, leads on complex cases and referrals, and oversees compliance with statutory guidance and local partnership requirements.

### **Designated Safeguarding Lead (DSL)**

**Rena Sparks, Manager**

The DSL holds operational responsibility for day-to-day safeguarding activity, including responding to concerns, recording, monitoring, liaison with families, and ensuring safe practice across all delivery models.

**A DSL or Deputy DSL is always available**, either onsite or remotely, whenever learners are engaged in:

- In-centre education
- Satellite site or off-site community delivery
- Online or remote AP sessions

- Off-site vocational or practical learning activities

## **2.2 Responsibilities of the Lead DSL**

The Lead DSL at Empowering Futures Alternative Provision will:

1. Provide strategic leadership for safeguarding and child/adult protection across all sites.
2. Ensure full compliance with KCSIE 2025, Working Together 2023, and the Care Act 2014.
3. Lead on all safeguarding referrals to Coventry, Walsall or Birmingham safeguarding partners, and liaise with police and other statutory agencies as necessary.
4. Oversee Prevent Duty compliance and act as the Prevent Lead.
5. Ensure robust and secure management of safeguarding records.
6. Ensure a coordinated response to safeguarding concerns, allegations, complaints, and disclosures.
7. Maintain oversight of safeguarding in online provision, including digital conduct, supervision, data security, and learner safety.
8. Deliver and monitor staff training, ensuring all staff receive timely updates.
9. Maintain oversight of safer recruitment and vetting checks.
10. Ensure reflective learning from safeguarding incidents informs ongoing policy and practice.

## **2.3 Responsibilities of the DSL**

The DSL will:

1. Act as the first point of contact for safeguarding concerns raised by staff, learners, tutors or contractors.
2. Assess concerns using thresholds outlined by Coventry, Walsall and Birmingham safeguarding partnerships.
3. Initiate Early Help when appropriate and liaise with social workers, SEND professionals and external agencies.
4. Coordinate and track attendance-related safeguarding concerns, including Children Missing Education (CME).

5. Provide practical support to staff following disclosures or incidents.
6. Ensure safe practice is followed during online AP delivery and off-site learning activities.
7. Maintain regular communication with parents and carers unless doing so places a learner at increased risk.
8. Ensure accurate and timely documentation of concerns, referrals and outcomes.

## **2.4 Responsibilities of Deputy DSLs (where appointed)**

Deputy DSLs will:

1. Support the Lead DSL and DSL in all safeguarding responsibilities.
2. Provide cover during absences or operational needs across multiple sites.
3. Hold a consistent standard of training equal to that of the DSL.
4. Contribute to policy development and staff support.

Deputy DSLs do not replace the authority of the Lead DSL but provide operational resilience in safeguarding provision.

## **2.5 Responsibilities of Senior Leadership**

Senior leaders at Empowering Futures Alternative Provision will:

1. Ensure all safeguarding policies and procedures remain up to date and compliant.
2. Allocate sufficient time, resources and authority to the DSL team.
3. Ensure safeguarding is integrated across all operational areas including HR, curriculum design, site management and online provision.
4. Respond appropriately to allegations or concerns raised about staff.
5. Promote a positive safeguarding culture and professional standards at all times.

## **2.6 Responsibilities of All Staff, Tutors, and Contractors**

Every member of staff, regardless of role, has a statutory duty to safeguard learners. All staff must:

1. Read and follow this policy and Part One of KCSIE 2025.
2. Attend safeguarding and Prevent training upon induction and annually thereafter.
3. Recognise indicators of abuse, neglect, exploitation and vulnerability. 4. Record and report all concerns **immediately** to the DSL or Lead DSL. 5. Maintain professional boundaries and adhere to the Staff Code of Conduct.
6. Ensure safe practice during vocational activities (e.g., beauty, nails, hair, sports).
7. Follow online safety expectations, including appropriate use of video, messaging and digital platforms.
8. Report concerns about colleagues (including low-level concerns) without delay.

Failure to follow safeguarding procedures may result in disciplinary action.

## **2.7 Responsibilities of Parents and Carers** Parents and

carers accessing Empowering Futures Alternative Provision are expected to: 1. Provide accurate emergency contact information.

2. Communicate relevant safeguarding or wellbeing information.
3. Support consistency in attendance, behaviour and engagement.
4. Work collaboratively with staff and external agencies.

Where parental cooperation is limited and poses a safeguarding risk, Empowering Futures will escalate to Early Help or statutory services as required.

## **2.8 Responsibilities to Adult Learners**

For adult learners, staff must:

1. Recognise indicators of abuse or neglect under the Care Act 2014.
2. Refer concerns to Adult Social Care via relevant LA procedures.

3. Respect autonomy and apply Mental Capacity Act principles.
4. Record and report concerns in the same way as child protection concerns.

Where an adult is also a parent/carer, staff must consider the potential impact on children in the household.

## 2.9 Multi-Agency Responsibilities

Empowering Futures Alternative Provision recognises its duty to:

1. Work collaboratively with statutory safeguarding partners.
2. Share relevant information lawfully and effectively.
3. Engage in multi-agency meetings, reviews and assessments.
4. Follow local partnership thresholds for intervention.
5. Support statutory safeguarding processes including CIN, CP, CLA, and Early Help.

## 2.10 Recording and Managing Safeguarding Information

Empowering Futures Alternative Provision ensures:

1. Safeguarding records are accurate, confidential and securely stored.
2. Information is shared only with appropriate individuals.
3. Record-keeping follows UK GDPR and Data Protection Act 2018.
4. Files are transferred securely when a learner moves to another provider or school.
5. Separate CP/adult safeguarding files are kept and not merged with academic files.

# SECTION 3: IDENTIFYING ABUSE AND NEGLECT (CHILDREN & ADULTS)

Empowering Futures Alternative Provision recognises that early identification of abuse, neglect, vulnerability and harm is essential to effective safeguarding. All staff, tutors and contractors must remain vigilant and able to recognise indicators of abuse for both **children and adults at risk** across all delivery models, including in-centre, off-site, satellite locations and online AP environments.

Safeguarding concerns may arise from behaviours, disclosures, physical evidence, communication, changes in presentation, attendance patterns or concerns raised by others.

## **3.1 Definitions of Abuse (Children)**

Under *Working Together 2023* and *KCSIE 2025*, abuse is defined as any form of maltreatment of a child by another person or persons. Abuse may occur:

- In person
- Online
- Between children
- By adults
- Within peer groups, relationships or families
- In community or online environments

The four statutory categories of child abuse are:

### **3.1.1 Physical Abuse**

A form of abuse which may involve:

- Hitting, shaking, throwing, poisoning
- Burning or scalding
- Suffocation or otherwise causing physical harm
- Fabricated or induced illness

#### **Indicators may include:**

Unexplained injuries, inconsistent explanations, fear of contact, flinching, wearing inappropriate clothing to hide injuries, or a sudden deterioration in behaviour.

### **3.1.2 Emotional Abuse**

The persistent emotional maltreatment of a child to cause severe and adverse effects on emotional development.

May involve:

- Conveying worthlessness or inadequacy
- Age-inappropriate expectations
- Preventing normal social interaction
- Seeing or hearing domestic abuse
- Serious bullying (including cyberbullying)
- Exploitation or corruption

#### **Indicators may include:**

Low self-esteem, withdrawn behaviour, excessive compliance, fearfulness, attachment difficulties, developmental delays.

### **3.1.3 Sexual Abuse**

Involves forcing or enticing a child to take part in sexual activities, whether or not violence is used.

Sexual abuse includes:

- Physical contact (penetrative or non-penetrative acts)
- Non-contact activities such as:
  - Viewing or producing sexual images
  - Encouraging children to behave sexually
  - Grooming (online or in person)
  - Exposing children to inappropriate content or behaviour

#### **Indicators may include:**

Sexualised behaviour, changes in emotional state, inappropriate knowledge, STIs, pregnancy, self-harm, distress around certain individuals.

### **3.1.4 Neglect**

The persistent failure to meet a child's basic physical or psychological needs.

This includes failure to provide:

- Food, clothing, shelter
- Supervision
- Medical care
- Emotional responsiveness
- Consistent boundaries or safe routines

#### **Indicators may include:**

Poor hygiene, persistent tiredness, inadequate clothing, poor school attendance, hunger, untreated medical issues.

## **3.2 Abuse of Adults at Risk**

Under the *Care Act 2014*, empowering Futures recognises the following

categories: **3.2.1 Physical Abuse**

Includes assault, misuse of medication, restraint, rough handling.

### **3.2.2 Domestic Abuse**

Includes coercive control, emotional, financial, sexual or physical abuse within intimate or family relationships.

### **3.2.3 Sexual Abuse**

Includes sexual activity without consent or capacity to consent.

### **3.2.4 Psychological Abuse**

Includes emotional abuse, threats, harassment, intimidation, controlling

behaviour. **3.2.5 Financial or Material Abuse**

Includes theft, fraud, exploitation, coercion around finances.

### **3.2.6 Neglect and Acts of Omission**

Includes ignoring medical needs, inadequate nutrition or heating, failure to provide access to services.

### **3.2.7 Organisational Abuse**

Poor practices within care or support settings.

### **3.2.8 Self-Neglect**

Failure to care for personal hygiene, health or surroundings.

### **3.2.9 Modern Slavery**

Includes trafficking, forced labour, debt bondage.

## **3.3 Additional Safeguarding Concerns (Children & Adults)**

These reflect updated statutory categories under KCSIE 2025.

### **3.3.1 Child Criminal Exploitation (CCE)**

Includes:

- County lines activity
- Drug supply and transportation
- Forced theft, violence or money movement

**Indicators:** unexplained money, new possessions, missing episodes, association with older peers.

### **3.3.2 Child Sexual Exploitation (CSE)**

A form of sexual abuse involving power imbalance and exploitation.

**Indicators:** gifts, older friendships, secrecy, absences, relationship with controlling adults.

### **3.3.3 Child-on-Child Abuse**

Includes:

- Sexual violence
- Sexual harassment
- Harmful sexual behaviour
- Physical violence
- Bullying or cyberbullying
- Upskirting
- Initiation or hazing

Empowering Futures maintains a **zero-tolerance** approach.

### **3.3.4 Domestic Abuse (Children & Adults)**

Children witnessing domestic abuse are recognised as victims in their own right.

Indicators include: fearfulness, aggression, anxiety, controlling dynamics at home, or disclosures.

### **3.3.5 Mental Health Concerns**

Safeguarding and mental health are closely linked.

Indicators include withdrawal, excessive risk-taking, self-harm, suicidal ideation, or deteriorating engagement.

### **3.3.6 Substance Misuse**

Alcohol or drug misuse by a parent, carer or learner may indicate neglect or risk.

### **3.3.7 Bullying (including Cyberbullying)**

Behaviour that is:

- Repeated
- Intentional
- Harmful

- Utilising power imbalance

May occur in person or online.

### **3.3.8 Missing from Education / Attendance Safeguarding**

Patterns of non-attendance may indicate:

- Neglect
- Criminal or sexual exploitation
- Domestic instability
- Mental health concerns

Staff must notify the DSL immediately of unexplained absences.

### **3.3.9 Online Abuse**

Includes:

- Grooming
- Exposure to sexual content
- Coercion
- Extremist content
- Cyberbullying
- Live-streaming exploitation
- Hacking or manipulation

This is particularly relevant due to Empowering Futures' online AP delivery.

### **3.3.10 Forced Marriage**

A criminal offence; learners may be coerced to marry without consent.

### **3.3.11 Honour-Based Abuse**

Violence committed to protect perceived cultural or family "honour".

### **3.3.12 Female Genital Mutilation (FGM)**

Staff have a legal duty to report known cases (under 18s) directly to the police. Indicators include difficulty walking, anxiety, repeated absence.

### **3.3.13 Radicalisation & Extremism**

Covered in detail in the standalone Prevent section later in the policy. Staff must report

concerns immediately to the DSL, who will consult Prevent as appropriate.

### **3.4 Indicators of Abuse in Online Learning Environments**

Staff must remain vigilant when delivering **online AP**, recognising:

- Learners appearing distressed during sessions
- Inappropriate backgrounds or individuals present
- Emotional withdrawal or sudden disengagement
- Online bullying or harassment
- Evidence of grooming or coercive communication
- Learners being contacted through non-approved platforms
- Unsafe camera positioning or environment concerns

Concerns must be reported to the DSL immediately.

### **3.5 Learner Disclosure of Abuse**

Learners may disclose abuse directly, indirectly or through behaviour. All staff must:

1. Listen carefully and remain calm.
2. Avoid asking leading questions.
3. Never promise confidentiality.
4. Reassure the learner they have done the right thing.
5. Record the disclosure immediately using the learner's own words.
6. Report directly to the DSL without delay.

### **3.6 Thresholds for Action**

Empowering Futures follows the thresholds and guidance set by:

- Coventry Safeguarding Children Partnership
- Walsall Safeguarding Partnership
- Birmingham Children's Trust / Partnership
- Local Adult Social Care services

Concerns may lead to:

- Early Help
- Referral to MASH / CASS

- Referral to Adult Social Care
- Police involvement
- Multi-agency meetings

The DSL will determine the appropriate course of action.

## **SECTION 4: SAFER RECRUITMENT, STAFF SUITABILITY & CODE OF CONDUCT**

Empowering Futures Alternative Provision is committed to creating and maintaining a safe, professional and trustworthy workforce. We follow safer recruitment practices to prevent unsuitable individuals from working with children, young people and adults at risk, and to uphold the highest standards of conduct in all roles.

This section outlines the recruitment processes, ongoing suitability checks and professional expectations required of all staff, tutors, contractors, volunteers and visitors.

### **4.1 Safer Recruitment Principles**

All recruitment at Empowering Futures Alternative Provision is conducted in line with:

- **Keeping Children Safe in Education (KCSIE) 2025**
- **Working Together to Safeguard Children (2023)**
- **Rehabilitation of Offenders Act 1974 (Exceptions Order)**
- **UK GDPR and Data Protection Act 2018**

We adhere to the following principles:

**1. Recruitment processes deter, identify and reject unsuitable applicants. 2.**

**All applicants are subject to rigorous pre-employment checks. 3.**

**Safeguarding responsibilities are clearly communicated from the outset.**

**4. Roles involving regulated activity require enhanced DBS checks and barred list checks.**

**5. Evidence of identity, qualifications, right to work and employment history is verified.**

**6. Gaps in employment are explored.**

**7. Concerns or inconsistencies are investigated before appointment.**

**8. Online searches are conducted for safeguarding and reputational risk**

**screening.**

A written record of all checks is retained within the Single Central Record (SCR).

## **4.2 Recruitment Stages**

Safer recruitment includes:

### **4.2.1 Advertising**

- All job adverts include a clear safeguarding statement.
- Expectations regarding DBS checks and suitability to work with vulnerable learners are explicit.

### **4.2.2 Shortlisting**

- Shortlisting is performed by trained staff.
- Applications are reviewed for safeguarding concerns, gaps in employment, or unexplained changes in career pattern.
- Online checks (public reputation, safeguarding concerns) are conducted prior to

interview. **4.2.3 Interview**

Interviews:

- Test safeguarding knowledge and scenarios.
- Verify professional attitudes, boundaries and communication.
- Probe inconsistencies in work history.
- Assess suitability for working with vulnerable learners.

### **4.2.4 Pre-Employment Checks**

Before appointment, the following checks are completed:

- Identity verification
- Enhanced DBS with Barred List where required
- Overseas police checks (where applicable)
- Right to work in the UK
- Qualification and professional evidence
- Employment references
- Explanation of employment gaps
- Medical fitness (where appropriate)

- Online reputation / safeguarding checks

No one may begin regulated activity until all required checks are completed.

## 4.3 Ongoing Suitability of Staff

### 4.3.1 Annual Safeguarding Declarations

All staff must complete annual declarations confirming:

- Continued suitability to work with vulnerable groups
- No relevant convictions, cautions or investigations
- No changes that would impact safeguarding responsibilities

### 4.3.2 Changes in Circumstances

Staff must immediately inform a DSL if:

- They become subject to a criminal investigation
- There are allegations or concerns about their conduct
- Their household experiences issues relevant to safeguarding (e.g., domestic abuse)
- They experience mental health difficulties that may affect safe practice

### 4.3.3 Contractors

Beauty tutors, sports coaches, external assessors and other contractors:

- Must be vetted and cleared before working directly with learners.
- Must not work unsupervised until DBS and identity checks are complete.
- Must follow the same Safeguarding Policy and Staff Code of Conduct.

## 4.4 Single Central Record (SCR)

Empowering Futures Alternative Provision maintains an SCR containing:

- DBS details
- Identity verification
- Barred list checks
- Qualification evidence
- Right to work
- Overseas checks (if applicable)
- Date safeguarding training was completed
- Role and start date

The SCR is kept securely and updated immediately when changes occur.

## **4.5 Induction and Training**

All staff, contractors and volunteers receive safeguarding induction including:

- This Safeguarding Policy
- KCSIE Part 1
- Prevent Duty
- Online safety
- Reporting and recording procedures
- Code of Conduct
- Whistleblowing
- Managing professional boundaries

Annual refresher training is mandatory.

DSLs receive higher-level training at least every two years and ongoing updates regularly.

## **4.6 Staff Code of Conduct (Incorporated into Safeguarding Policy)**

All staff working at Empowering Futures Alternative Provision must adhere to the following professional expectations. Breaches may result in disciplinary action or referral to statutory agencies.

### **4.6.1 Professional Conduct**

Staff must:

- Maintain a professional, respectful and non-judgmental approach.
- Uphold confidentiality within safeguarding boundaries.
- Use appropriate language and behaviour at all times.
- Avoid any conduct that could be misinterpreted or undermine trust.
- Adhere to safer working practice guidelines.

### **4.6.2 Relationships and Boundaries**

Staff must:

- Maintain clear professional boundaries with learners and families.

- Never form inappropriate relationships.
- Avoid fostering dependence or favouritism.
- Not share personal contact details with learners.
- Not communicate with learners via private messaging or personal accounts.
- Not give gifts or accept gifts that could be misinterpreted.

Online AP delivery must use **approved platforms ONLY**, with cameras and microphones used according to policy.

### 4.6.3 Physical Contact

Physical contact must:

- Only occur when necessary to assure safety
- Be appropriate and proportionate
- Be documented if related to safeguarding or behaviour management

Physical restraint must NEVER be used unless trained and absolutely necessary to prevent harm.

Empowering Futures does not permit routine physical intervention.

### 4.6.4 Appearance & Professional Standards

Staff must:

- Present professionally in line with the organisation's expectations
- Wear appropriate attire for vocational settings (beauty, nails, sports etc.)
- Ensure personal hygiene and professionalism at all times

### 4.6.5 Conduct in Vocational Settings

Staff must:

- Monitor safe use of equipment
- Apply risk assessments consistently
- Ensure learners follow health and safety guidance
- Never allow unsupervised access to harmful tools, chemicals or machinery

This is particularly relevant in **beauty, hair, nails, sports and fitness settings**.

### 4.6.6 Online Conduct and Digital Safety

Staff must:

- Use only approved Empowering Futures platforms
- Ensure online sessions take place in a professional environment
- Not allow learners to join sessions without appropriate supervision and safeguards
- Report any concerns arising from online sessions immediately
- Prohibit recording unless authorised within policy

## 4.6.7 Whistleblowing Obligations

Staff must report concerns about colleagues immediately to:

- The Lead DSL
- The DSL
- The Director (if concerns relate to the DSL)
- The LADO (if concerns involve staff harming or risking harm to a child) No staff

member will suffer detriment for raising a safeguarding concern in good faith.

## 4.7 Low-Level Concerns and Allegations Against Staff

Empowering Futures follows KCSIE 2025 definitions:

### Low-Level Concern

Any concern about a member of staff's behaviour that does not reach the threshold of an allegation but may indicate behaviour inconsistent with the Code of Conduct.

Examples include:

- Inappropriate tone or language
- Excessive friendliness
- Boundary-blurring behaviour

Low-level concerns must be reported to the DSL immediately.

### Allegations Against Staff

If a learner or adult reports harm or risk of harm by a member of

staff: The DSL/Lead DSL will:

- Ensure immediate safety
- Inform the LADO within one working day
- Follow all local partnership procedures
- Take staff welfare into account, ensuring fairness and confidentiality

No internal investigation will occur before consulting the LADO.

# SECTION 5: SAFEGUARDING REPORTING PROCEDURES

(Flowchart and Detailed Guidance)

## 5.1 SAFEGUARDING REPORTING FLOWCHART

*(Applicable to all children, young people, and adult learners)*

### IF YOU HAVE A SAFEGUARDING CONCERN ABOUT A LEARNER:

#### 1. Immediate Response

- Ensure the learner is safe.
- Stay calm; listen; do not ask leading questions.
- Do not promise confidentiality.
- Reassure the learner appropriately.

#### 2. REPORT THE CONCERN IMMEDIATELY

Contact, in this order of priority:

1. **Lead DSL: Rhean White**
2. **DSL: Rena Sparks**
3. **Deputy DSLs (where applicable)**
4. If none available and the risk is immediate: **Call Police on 999** or contact appropriate MASH/CASS.

**Do not delay. Concerns must be escalated on the same day.**

#### 3. RECORD THE CONCERN

Complete a written safeguarding record including:

- Date, time, location
- Learner details
- Words spoken by learner (as close as possible)
- Observations
- Any actions taken

Submit the written record **to the DSL on the same day**.

#### **4. DSL DECISION & ACTIONS**

The DSL will assess the concern and decide whether to:

- **Initiate immediate referral to Children's Services**
- **Refer to Adult Social Care**
- **Consult Police**
- **Initiate Early Help**
- **Monitor over time**
- **Contact parents/carers** (unless this increases risk)

All referrals follow Coventry, Walsall or Birmingham procedures depending on learner location.

#### **5. FOLLOW-UP AND RECORDING**

- DSL records outcome and rationale.
- Safeguarding files are updated and stored securely.
- Staff are informed on a need-to-know basis only.
- Follow-up actions may include multi-agency meetings, support planning, attendance monitoring or welfare checks.

#### **6. IF YOU HAVE A CONCERN ABOUT A MEMBER OF STAFF**

Report immediately to:

1. **Lead DSL or DSL**
2. If the concern is **about the DSL** → report directly to the **Director** (if different)
3. **LADO must be informed within one working day**

Never investigate internally before consulting the LADO.

#### **7. IF YOU BELIEVE A LEARNER IS IN IMMEDIATE DANGER**

- **Call 999**

- Then notify the DSL as soon as safe to do so

## 5.2 DETAILED REPORTING PROCEDURES

This section explains the professional expectations following the flowchart.

### 5.2.1 Immediate Actions by Staff

When a concern arises:

- Do not discuss with other learners.
- Do not contact the alleged perpetrator or parents before DSL advice.
- Maintain confidentiality.
- Ensure the learner is supervised and supported.
- Make a contemporaneous record with factual, objective language.

### 5.2.2 Reporting Concerns About Children

Concerns may relate to:

- Abuse or neglect
- Domestic abuse
- Mental health risk
- Criminal exploitation (CCE) or sexual exploitation (CSE)
- Bullying or online harm
- Absences or missing episodes
- Harmful sexual behaviour
- Unsafe online environment during AP sessions

All concerns must be escalated to the DSL **immediately**.

### 5.2.3 Reporting Concerns About Adults at Risk

Concerns about adult learners must be reported in the same way. Adult safeguarding considerations include:

- Capacity and consent
- Vulnerability due to disability, mental health or social circumstances
- Domestic abuse

- Self-neglect
- Financial exploitation

The DSL will refer to Adult Social Care if thresholds are met.

## **5.3 DSL RESPONSE & ACTION**

Upon receiving a report, the DSL will:

### **5.3.1 Assess Information**

- Consider context, chronology, and vulnerability
- Consult threshold guidance for Coventry, Walsall or Birmingham

### **5.3.2 Decide on Action**

Possible outcomes:

1. **Immediate referral to Children's Services / Adult Social Care**
2. **Police referral (999 or 101)**
3. **Prevent referral (discussed in standalone Prevent section)**
4. **Early Help Assessment**
5. **Internal support plan and monitoring**
6. **No further action required (with recording)**

### **5.3.3 Recording**

All decisions must:

- Be fully recorded
- Include rationale
- Be kept securely and separately from academic files
- Be monitored for patterns of risk

## **5.4 LOCAL AUTHORITY REFERRAL ROUTES**

The DSL follows the correct authority based on the learner's home address or placement responsibility.

### **5.4.1 Coventry**

- **MASH:** 024 7678 8555
- **Emergency Duty:** 024 7683 2222
- **LADO:** 024 7697 5483

### **5.4.2 Walsall**

- **MASH:** 0300 555 2866
- **Emergency Duty:** 0300 555 2922
- **LADO:** 01922 650 487

### **5.4.3 Birmingham**

- **CASS:** 0121 303 1888
- **Emergency Duty:** 0121 675 4806
- **LADO:** 0121 675 1669

### **Police**

- **999** for immediate risk
- **101** for non-urgent reports

## **5.5 Record Keeping and Data Management**

Empowering Futures Alternative Provision:

- Maintains secure, confidential safeguarding records
- Uses chronological recording
- Keeps files separate from teaching records
- Shares information lawfully and proportionately
- Ensures records are transferred securely to new education providers

## **5.6 Information Sharing**

Information may be shared with:

- Schools (mainstream or special)
- Social care
- Youth offending services
- Health professionals
- Police
- External agencies supporting the learner

Information sharing must follow:

- *Working Together 2023*
  - *KCSIE 2025*
  - UK GDPR / DPA 2018
- Consent is not required if a learner is at risk of harm.

## **5.7 Reporting Concerns in Online AP Delivery**

Staff must remain alert during remote sessions to indicators of harm. Concerns arising during online sessions must be:

- Reported immediately to the DSL
- Recorded like any safeguarding concern
- Supported with screenshots or session notes (if appropriate and lawful)
- Escalated to parents/carers only when safe to do so

DSLs must consider whether:

- Home environment risks are present
- Additional supervision is needed
- The session should be terminated

## **SECTION 6: MANAGING ALLEGATIONS, LOW-LEVEL CONCERNS & HARMFUL BEHAVIOUR**

Empowering Futures Alternative Provision has a legal duty to safeguard all learners by ensuring that concerns about the conduct of staff, contractors, volunteers or learners are managed promptly, professionally, and in accordance with statutory guidance.

This section outlines procedures for responding to:

- Allegations against staff and adults working with learners
- Low-level concerns
- Allegations or concerns about learners harming others
- Harmful sexual behaviour
- Peer-on-peer abuse (child-on-child)
- Serious incidents requiring LADO or police involvement

## 6.1 Principles

- All allegations and concerns must be taken seriously.
  - Learners must be protected from harm immediately.
  - Staff subject to allegations must be treated fairly and with dignity.
  - No internal investigation may begin before consulting the **Local Authority Designated Officer (LADO)** if the allegation meets LADO criteria.
  - Confidentiality is essential; information must be shared on a need-to-know basis.
- Empowering Futures Alternative Provision will follow the procedures for Coventry, Walsall or Birmingham depending on learner location.

## 6.2 Allegations Against Staff, Tutors, Contractors or Volunteers

An allegation may relate to a person who works with children or adults at risk (in paid or unpaid capacity) who has:

1. Behaved in a way that has harmed a learner or may have harmed a learner
2. Possibly committed a criminal offence against or related to a learner
3. Behaved in a way that indicates they may pose a risk of harm

Behaved in a way that indicates they may pose a risk of harm

4. Behaved in a way that raises safeguarding concerns in their personal life (including domestic abuse)
5. Behaved in a way that could bring the organisation into disrepute
6. Violated professional boundaries or the Code of Conduct

Allegations may arise from:

- Disclosures
- Observations
- Online sessions
- Social media information
- Concerns raised by colleagues or parents
- External agency notifications

## 6.2.1 Immediate Actions

If an allegation is made:

1. **Protect the learner immediately.**
2. **Report immediately to the Lead DSL or DSL.**
3. DSL assesses whether the allegation meets the **harm threshold**.
4. DSL takes advice from **LADO within one working day** if thresholds are met.
5. Do not question the learner or staff member beyond basic clarification.
6. Ensure accurate written records of what was reported.

Internal investigations **must not** occur before LADO consultation.

## 6.2.2 LADO Threshold

The DSL must refer to LADO if the person in question has:

- Harmed or may have harmed a child
- Possibly committed a criminal offence
- Behaved in a way that indicates risk of harm to children
- Behaved in a way that raises safeguarding concerns in their personal life

## 6.2.3 Possible Outcomes Following LADO Consultation

LADO may advise:

- No further action (internal follow-up only)
- Strategy meeting
- Police investigation
- Section 47 child protection enquiries
- Disciplinary procedures
- Undertaking of risk assessments or management plans

DSL must adhere strictly to instructions given.

## 6.2.4 Suspension

Suspension is not automatic.

It may be considered when:

- There is cause to suspect a learner is at risk
- The allegation is so serious that removal from operational duties is required

- Suspension protects the integrity of the investigation

Alternative measures such as supervised duties may be used where appropriate.

## 6.3 Low-Level Concerns

Low-level concerns are defined under KCSIE 2025 as:

“Any concern that an adult has acted in a way that is inconsistent with the Staff Code of Conduct but does not meet the threshold for LADO referral.”

Examples include:

- Overfamiliar tone or behaviour
- Boundary-blurring interactions
- Inappropriate comments that are unprofessional but not abusive
- Failure to maintain digital/online boundaries
- Minor breaches of conduct during practical sessions

Low-level concerns must:

1. Be reported immediately to the DSL.
2. Be recorded in the low-level concern log.
3. Trigger reflective practice, guidance or supervision.

Patterns of low-level concerns may escalate to a LADO referral.

## 6.4 Allegations or Concerns About Learners (Harmful Behaviour)

Empowering Futures recognises that learners may pose risks to other learners. This includes behaviour that is:

- Physical
- Sexual
- Emotional
- Coercive
- Financial
- Online/digital
- Exploitative
- Linked to vulnerability or peer pressure

The DSL must respond robustly to all harmful behaviour.

## 6.4.1 Child-on-Child Abuse

Child-on-child abuse includes:

- Sexual harassment
- Sexual violence
- Harmful sexual behaviour
- Coercive relationships
- Bullying or cyberbullying
- Physical assault
- Upskirting
- Hazing or initiation rituals
- Online abuse including sharing of images

Empowering Futures Alternative Provision holds a **zero-tolerance**

approach. These behaviours require:

- Immediate separation and supervision
- DSL assessment
- Referral to Children's Services if harm or risk is identified
- Police involvement for sexual offences
- Safety planning for all involved

## 6.4.2 Sexual Harassment and Sexual Violence

This includes behaviour such as:

- Unwanted sexual comments
- Sexualised joking
- Physical contact or attempts at contact
- Sharing sexual content
- Coercive online behaviour (messages, images, videos)

If sexual violence is reported:

- **Police must be contacted**
- DSL must refer to Children's Services
- Learner must be supported by trauma-informed staff

## 6.4.3 Harmful Sexual Behaviour (HSB)

HSB includes developmentally inappropriate behaviours that range from problematic to abusive.

The DSL may involve:

- Social care
- Police
- Specialist HSB services
- Local multi-agency safeguarding teams

#### **6.4.4 Violence, Threats or Intimidation**

Physical fights, threats of violence, possession of weapons, or gang affiliation must be:

- Reported to the DSL
- Risk assessed
- Referred to appropriate agencies where threshold is met
- Considered under CCE risk indicators

#### **6.4.5 Learners Aged 18+ (Adults at Risk)**

If the learner is 18 or older:

- Safeguarding concerns follow Adult Social Care thresholds
- Police must be contacted if criminal activity is reported
- Adult safeguarding processes run parallel to risk management within AP

#### **6.4.6 Record Keeping for Learner Allegations**

DSL must record:

- Incident details
- Involved learners
- Actions taken
- Agency referrals
- Risk management and safety plans

### **6.5 Whistleblowing**

Empowering Futures Alternative Provision encourages staff to report:

- Poor practice
- Unsafe behaviour
- Safeguarding failures
- Misconduct by colleagues
- Any concerns about how a safeguarding issue is being managed

Reports may be made to:

- Lead DSL
- DSL
- Director
- LADO
- NSPCC Whistleblowing Helpline

No staff member will face detriment for raising concerns in good faith.

## 6.6 Staff Welfare and Support

Where allegations are made against staff:

- Support will be offered confidentially
- The DSL will maintain communication without compromising investigations
- Occupational support or signposting may be provided

# SECTION 7: ONLINE SAFETY & REMOTE LEARNING SAFEGUARDING

Empowering Futures Alternative Provision recognises that online learning creates additional safeguarding considerations. We deliver alternative provision both **in person** and **online**, and therefore must ensure that all learners—children and adults—are safe during remote sessions.

This section outlines expectations for staff and learners, supervision standards, platform requirements, recording rules and the online safeguarding responsibilities of DSLs.

Online safety is embedded within our wider safeguarding culture, and all incidents arising during remote learning are treated with the same seriousness as those occurring onsite.

## 7.1 Principles of Online Safety

Online provision must be:

- Safe
- Supervised
- Recorded appropriately
- Transparent
- Delivered through approved digital platforms
- Bound by the same safeguarding standards as in-person teaching

Staff must maintain professional boundaries and uphold the Staff Code of Conduct at all times during virtual sessions.

Learners and families must understand online rules and expectations before sessions begin.

## 7.2 Approved Platforms and Digital Tools

Only platforms approved by Empowering Futures Alternative Provision may be used for:

- Online lessons
- 1:1 support
- Group sessions
- Assessments
- Tutorials
- Catch-up programmes

Use of personal accounts, private messaging or unsanctioned apps is strictly prohibited.

## 7.3 Staff Responsibilities During Online Sessions

Staff must:

1. Use only organisation-approved devices or secure logins.
2. Deliver sessions from a professional, private space with a neutral background.
3. Keep cameras on unless exceptional circumstances arise.
4. Ensure appropriate dress and conduct.
5. Never allow photographic or video recordings unless authorised.
6. Maintain professional language, tone and behaviour.
7. Monitor learner engagement and welfare indicators.
8. Document any concerns and report to the DSL immediately.
9. Never have unsupervised, unrecorded 1:1 interactions unless explicitly risk-assessed and authorised.
10. Ensure no other household members appear onscreen.

## 7.4 Identifying Safeguarding Concerns in Online Sessions

Staff must remain vigilant to the following indicators:

- Learner appears frightened, distressed or coerced
- Unknown adults visible or audible in the background
- Inappropriate background environment
- Learner discloses abuse or appears unsafe
- Signs of neglect, self-harm, domestic abuse or exploitation
- Learners interacting inappropriately with one another
- Evidence of online grooming, manipulation or extremist influence
- Learner messaging staff outside approved channels

Any of the above must be reported to the DSL immediately.

## 7.5 Recording, Monitoring and Data Protection

### Recording Sessions

- Sessions are not routinely recorded unless specified as part of a structured programme or risk assessment.
- If recording is used, learners and parents are informed in advance.
- Recordings must be stored securely and accessed only by authorised

### staff. **Attendance and Behaviour**

- Attendance logs are maintained for safeguarding and CME purposes.
- Behaviour concerns must be recorded exactly as they would be in-person.

### Data Protection

- UK GDPR principles apply fully.
  - Staff must not download or store learner personal data on personal devices.
- Screenshots, where used as evidence of safeguarding concerns, must be sent only to the DSL using secure methods.

## 7.6 Learner Expectations for Online Sessions (Child & Adult Learners)

*(This fulfils your request to include this within the Safeguarding*

*Policy.)* All learners must:

1. Join sessions on time.
2. Attend from a safe, private location wherever possible.

3. Dress appropriately.
4. Conduct themselves respectfully.
5. Keep cameras on unless authorised otherwise.
6. Not allow other household members to appear on camera.
7. Avoid background noise, inappropriate images or distractions.
8. Follow staff instructions and session protocols.
9. Not use the chat function inappropriately.
10. Not take screenshots, photos or recordings.
11. Report concerns to staff or DSLs.

Failure to follow expectations may result in:

- Safeguarding follow-up
- Removal from the session
- Behavioural intervention
- Multi-agency involvement if risk is identified

## **7.7 Parents/Carers and Online Learning**

Parents/carers must:

- Ensure learners have access to a safe, quiet environment
- Respect the confidentiality of other learners
- Support punctuality and engagement
- Not interrupt sessions unless required
- Not record or photograph sessions
- Contact the DSL if concerns arise

## **7.8 DSL Responsibilities in Online Provision**

The DSL and Lead DSL must:

- Oversee online learning safeguarding arrangements
- Ensure staff training includes online safety and remote conduct
- Review any incident or disclosure arising during sessions

- Monitor attendance and patterns of disengagement
- Liaise with LAs when learners are remote and risks are present
- Ensure risk assessments exist for vulnerable learners participating online

## 7.9 Risks Specific to Online Learning

Risks include:

- Online grooming
- Exposure to harmful content
- Digital coercion
- Domestic abuse exposure
- Cyberbullying
- Inappropriate private messaging
- Shared devices and lack of privacy
- Camera/microphone misuse
- Social isolation
- Increased vulnerability for SEND learners

Empowering Futures Alternative Provision will mitigate these risks through:

- Clear expectations
- Staff vigilance
- Regular communication with families
- Early Help or statutory referrals
- Online safety education for learners

## SECTION 8: ATTENDANCE, CHILDREN MISSING EDUCATION (CME) & OFF-SITE SAFEGUARDING

Attendance is a key safeguarding indicator. Persistent absence, sudden disengagement or irregular attendance patterns may reflect underlying safeguarding concerns including neglect, domestic abuse, exploitation, mental health needs or family instability.

Empowering Futures Alternative Provision treats attendance as a core safeguarding function and ensures robust systems for monitoring, follow-up and escalation.

### 8.1 Attendance Expectations

All learners accessing Empowering Futures, whether children, young people or adults, are expected to attend regularly and punctually.

Attendance expectations apply to:

- In-centre delivery
- Satellite sessions
- Off-site vocational activities
- Online and remote AP sessions

Attendance is recorded consistently across all delivery models.

## 8.2 Attendance as a Safeguarding Indicator

Staff must consider safeguarding factors where:

- A learner stops attending suddenly
- A family withdraws without notice
- A learner disengages from online sessions
- Absences become frequent or patterned
- Concerns arise about home circumstances preventing attendance
- The learner expresses fear or reluctance to attend
- A learner is repeatedly collected late or dropped off inappropriately
- Parents/carers fail to respond to contact

Any concerns must be reported to the DSL.

## 8.3 Procedures for Non-Attendance

When a learner is absent:

### Initial Stage

- Contact is attempted with parent/carer or adult learner.
- A welfare call is made.
- Attempts are recorded.

### If No Contact is Achieved

DSL will assess whether the absence is:

- Unexplained
- Unexpected
- Out of character
- Associated with known risks (CCE, CSE, domestic abuse, mental

health) **Escalation**

Where risk is suspected, the DSL may:

- Conduct a safe and appropriate home welfare check (if policy allows)
- Contact the placing school or Local Authority

- Initiate Early Help
- Refer to Children's Services or Adult Social Care

## **Persistent Absence**

Persistent non-attendance may indicate:

- Neglect
- Family instability
- Hidden harm
- Exploitation
- Mental or physical health deterioration

Concerns must be managed through safeguarding procedures.

## **8.4 Children Missing Education (CME)**

CME refers to children of compulsory school age who are:

- Not registered at any school  
and/or
- Not receiving suitable education elsewhere

Empowering Futures Alternative Provision must notify placing schools or Local Authorities immediately when:

- A learner stops attending without explanation
- Attempts to contact the family repeatedly fail
- A learner's whereabouts are unknown
- A withdrawal request raises safeguarding concerns

CME concerns require fast escalation because learners who go missing from education are at heightened risk of:

- CSE or CCE
- Forced marriage
- Honour-based abuse
- Criminal activity
- Domestic abuse exposure
- Trafficking
- Mental health crisis

## **8.5 Safeguarding Responsibilities During**

**Travel** Learners may travel up to **one hour** to reach our provision.

Staff must consider travel risks including:

- Unsafe routes
- Anti-social behaviour
- Known gang territories
- Weather-related risks
- Travel-alone vulnerabilities
- SEND-specific travel needs

Where risks are identified:

- Safety planning is conducted
- LA transport teams may be contacted
- Parents/carers are involved
- Timetable alterations may be made (case-by-case)

## **8.6 Off-Site, Satellite and Community-Based Delivery**

Empowering Futures Alternative Provision uses satellite sites and community centres where appropriate.

Safeguarding measures include:

- Site-specific risk assessments
- Staff DBS and identity checks
- Emergency procedures known to all staff
- DSL availability at all times
- Reliable communication systems between remote staff and DSLs
- Supervision that meets safer working practice standards

All off-site learners remain the safeguarding responsibility of Empowering Futures during delivery hours.

## **8.7 Vocational and Practical Learning Environments**

Many learners attend:

- Beauty studios
- Nail training rooms
- Hair training environments
- Sports, fitness and coaching facilities
- Off-site practical learning venues

Risks include:

- Use of chemicals or equipment
- Hot tools or sharp instruments
- Heavy or specialist sports equipment
- Physical contact for demonstrations
- Client-model interactions

Safeguarding controls include:

- Clear staff supervision
- Safe ratios
- Professional boundaries
- Appropriate PPE
- Emergency first aid availability
- Incident reporting
- Behaviour expectations
- No learner left alone with external clients unless authorised and risk assessed

## **8.8 Online Delivery Attendance**

Non-attendance at online sessions must be treated as seriously as in-person absences. If a learner:

- Fails to join a scheduled session
- Leaves abruptly
- Does not respond to communication
- Appears distressed and then disconnects

Staff must report concerns immediately to the DSL.

Patterns of missed online sessions require monitoring and may trigger:

- Welfare checks
- LA notification
- Early Help
- Social care referral

## **8.9 Communication with Schools and Local Authorities**

Empowering Futures Alternative Provision communicates attendance-related safeguarding issues to:

- Mainstream schools
- Special schools
- Virtual Schools
- Local Authority Inclusion Teams
- SEND departments
- Social workers
- Youth offending teams (if relevant)

A professional, transparent approach is maintained at all times.

## **8.10 Recording Attendance & Absence Safeguarding**

All attendance data is:

- Recorded on secure systems
- Monitored for patterns
- Reviewed regularly by DSL and Manager
- Stored in accordance with UK GDPR and DPA 2018
- Shared with referring bodies when risk is identified

# **SECTION 9: CURRICULUM, EDUCATION, WELFARE & MULTI-AGENCY SUPPORT**

Empowering Futures Alternative Provision delivers an adaptive, personalised and vocationally focused curriculum designed to meet the educational, emotional and developmental needs of children, young people and adults at risk. Safeguarding is embedded throughout every aspect of our curriculum, including practical and online environments.

Our educational model includes:

- Hair
- Beauty
- Nails
- Sports
- Fitness and coaching
- Customer service
- Business skills
- Online alternative provision
- Academic catch-up and life skills

Each pathway includes safeguarding, wellbeing and safe practice components appropriate to the learning environment.

## **9.1 Safeguarding Within the Curriculum**

Learners are taught to:

- Recognise unsafe situations
- Understand healthy and unhealthy relationships
- Identify grooming, coercion and exploitation
- Understand digital risks and online safety
- Seek help appropriately

- Build resilience and confidence
- Protect their physical and emotional wellbeing
- Understand professional conduct in workplace environments

Safeguarding is not delivered as a single session but integrated across learning activities.

## 9.2 Safeguarding in Vocational Pathways

Given the practical nature of many Empowering Futures programmes, safeguarding and safety must underpin all aspects of delivery.

### Hair, Beauty and Nail Training

Risk areas include:

- Use of heated tools, sharp tools, chemicals, adhesives, acetone
- Close physical proximity during treatments
- Misuse of equipment
- Contact with clients or external models
- Professional boundary expectations
- Appropriate attire and hygiene

Staff responsibilities include:

- Ensuring safe ratios
- Monitoring interactions
- Enforcing professional boundaries
- Conducting environment risk assessments
- Supervising all treatments and demonstrations
- Responding appropriately to potential hazards

### Creative Media

Given the use of digital technology, online platforms and creative equipment, safeguarding and safety remain central to delivery within Creative Media pathways.

Risk areas include:

- Use of computers, tablets, cameras and digital equipment
- Electrical safety and workstation setup
- Exposure to inappropriate online content
- Online communication and digital interaction risks
- Data protection and misuse of images or media
- Professional boundary expectations in digital and online environments

Staff responsibilities include:

- Ensuring appropriate supervision ratios
- Monitoring online and in-person interactions
- Enforcing clear professional and digital boundaries
- Conducting environment and equipment risk assessments
- Supervising all practical activities and digital production

- Responding appropriately to safeguarding, online safety or equipment-related concerns.

## **Sports and Fitness Provision**

Risk areas include:

- Physical injury
  - Inappropriate physical contact
  - Peer aggression
  - Overexertion or medical issues
  - Body image concerns
  - Pain, bruising or unexplained marks
  - Harmful coaching behaviours

Staff responsibilities include:

- Close supervision
- Ensuring safe use of equipment
- Warm-up and cool-down safety
- Monitoring injury explanations for potential safeguarding concerns
- Maintaining appropriate physical boundaries
- Isolating unsafe behaviour immediately

## **Customer Service / Business Training**

Safeguarding considerations include:

- Managing customer interactions professionally
- Understanding harassment and boundaries
- Preventing exploitation in workplace-style scenarios
- Digital safety and appropriate communication

# **9.3 Promoting Positive Mental Health & Emotional Wellbeing**

Empowering Futures Alternative Provision recognises the strong link between safeguarding and mental health.

Staff responsibilities include:

- Identifying early signs of emotional distress
- Responding sensitively to disclosures
- Working with parents, carers and external professionals
- Ensuring high-risk learners have additional support plans
- Making referrals to CAMHS or relevant agencies
- Supporting learners affected by trauma, bereavement or domestic abuse Concerns about

mental health may also represent safeguarding concerns requiring referral.

## 9.4 Supporting Learners with SEND

Many learners at Empowering Futures present with:

- Autism spectrum conditions
- ADHD
- SEMH needs
- Learning difficulties
- Speech and language needs
- Anxiety
- Sensory processing differences

Staff must:

- Deliver differentiated learning and communication
- Understand how SEND needs can mask or mimic safeguarding concerns •
- Recognise that some learners may present limited verbal communication •
- Ensure their voices are heard through alternative communication strategies •
- Apply trauma-informed approaches
- Reduce environmental triggers where possible

SEND learners may be at increased vulnerability due to:

- Dependency on adults
- Difficulty recognising unsafe behaviour
- Limited communication of distress
- Impulsivity or emotional dysregulation

All SEND-specific safeguarding concerns must be escalated to the DSL.

## 9.5 Multi-Agency Working and Early Help

Empowering Futures Alternative Provision actively collaborates with:

- Schools and Virtual Schools
- Social care (children and adults)
- Police
- Health services including CAMHS
- Youth justice services
- Family support and Early Help teams
- Domestic abuse services
- Housing or community agencies
- SEND professionals
- Vocational placement providers

We provide timely, accurate information to enable coordinated support.

Where Early Help needs are identified:

- The DSL may initiate an Early Help Assessment
- Staff may contribute to Team Around the Family (TAF) meetings
- Multi-agency plans may be implemented

If Early Help is refused and the learner remains at risk, the DSL will escalate to statutory services.

## **9.6 Learner Voice and Participation**

Empowering Futures values learner input. Learners are encouraged to:

- Share concerns
- Provide feedback on safety
- Contribute to welfare planning
- Highlight unsafe practices or environments

Learner voice is particularly important for SEND learners and those with limited communication.

## **9.7 Support for Parents and Carers**

Parents and carers may require support due to:

- Mental health needs
- Family conflict
- Domestic abuse
- Substance misuse
- Housing instability
- Poverty or food insecurity
- Additional needs of siblings

Staff must share safeguarding concerns with the DSL when risk is identified and work collaboratively with families unless doing so places the learner at risk.

## **9.8 Cultural Sensitivity and Inclusion**

Empowering Futures Alternative Provision promotes:

- Cultural awareness
- Respect for all backgrounds
- Understanding of how cultural norms may affect safeguarding

- Inclusive practice
- Identification of honour-based abuse, forced marriage or discriminatory neglect

## SECTION 10: PREVENT DUTY & RADICALISATION

Empowering Futures Alternative Provision has a statutory duty under Section 26 of the Counter-Terrorism and Security Act 2015 to safeguard learners from being drawn into terrorism or extremist ideology. Prevent is part of our **overall safeguarding framework**, not a standalone process.

We focus on:

- Early identification
- Proportionate response
- Partnership with Prevent officers and Channel
- Building learner resilience
- Addressing vulnerabilities that may expose learners to extremist influence
- Managing online risk during remote AP sessions

Prevent applies to **children and adults**, including staff, learners, contractors, visitors and volunteers.

### 10.1 What Prevent Means in Practice

Prevent is not about:

- Criminalising learners
- Spying on individuals
- Political judgment
- Preventing legitimate debate

Prevent **is** about:

- Recognising signs of radicalisation
- Supporting vulnerable individuals
- Challenging extremist narratives safely
- Working with families and agencies
- Protecting learners from online extremist harms
- Reducing risk environments

### 10.2 Definitions

**Radicalisation**

The process by which an individual comes to support terrorism, extremist ideology or violent action.

## **Extremism**

Vocal or active opposition to fundamental British values, including tolerance and

respect. **Terrorism**

Use or threat of action designed to influence government or intimidate the public for political, ideological or religious purposes.

# **10.3 Vulnerability Factors**

Radicalisation is often linked to:

- Identity crisis or belonging needs
- Isolation or loneliness
- Bullying or peer pressure
- SEND or cognitive vulnerabilities
- Grievances (personal or political)
- Mental health issues
- Trauma and instability
- Experience of racism or discrimination
- Social media influence
- Online gaming interactions
- Poverty, family conflict or domestic abuse
- Criminal exploitation crossover

# **10.4 Indicators of Radicalisation (General, High-Level)**

Staff should look out for:

- Sudden changes in behaviour or dress
- Isolation from peers or withdrawal
- Fixation on conspiracy theories
- Expressing extreme viewpoints
- Glorifying violence or martyrdom
- Hostility towards certain groups
- Spending excessive time on encrypted apps
- Unexpected travel communications
- Increased secrecy in online activity
- Sharing extremist symbols or slogans

- Repeating scripted rhetoric

## 10.5 Detailed Contextual Examples (Option A)

*(These examples support training and satisfy the user's request while remaining compliant and non-sensitive.)*

Staff may encounter:

### 10.5.1 Far-Right Narratives

Indicators may include:

- Talking about “race war” or “replacement theories”
- Sharing far-right symbols, runes or numeric codes
- Idolising extremist individuals
- Anti-migrant rhetoric that escalates into dehumanisation
- Fixation on violent nationalism

### 10.5.2 Islamist Extremist Narratives

Indicators may include:

- Misinterpreting religious teaching to justify violence
- Claiming it is a duty to fight Western systems
- Sharing propaganda from proscribed groups
- Expressing admiration for individuals linked to violent acts

### 10.5.3 Anti-Government or Conspiracy-Based Extremism

Indicators may include:

- Belief that violence is justified to overthrow “the system”
- Engagement with extreme conspiracy content (sovereign citizen, anti-authority)
- Rejection of all lawful authority
- Viewing professionals as illegitimate threats

### 10.5.4 Online Influencer-Based Radicalisation

This includes extremist influencers using:

- TikTok
- Instagram
- Encrypted messaging apps
- Gaming voice chats
- YouTube algorithms

Learners may begin repeating:

- Misogynistic ideologies
- “Warrior culture” content
- Calls for aggression
- Anti-minority rhetoric

### **10.5.5 SEND-Specific Vulnerability**

Learners with ASD, ADHD, SEMH or learning difficulties may be targeted because they:

- Want belonging
- Are easily influenced
- Take extremist narratives literally
- Struggle to detect manipulation
- Seek structure or meaning

## **10.6 Prevent Duty Procedures**

When a concern is identified:

### **1. Staff Notify DSL Immediately**

Concerns must not be ignored, and no one should attempt to investigate

themselves. **2. DSL Assesses Risk**

Considering:

- Vulnerability
- Intent
- Capability
- Protective factors
- Online environment

### **3. DSL Consults Prevent Team (Non-Emergency)**

For Coventry, Walsall or Birmingham depending on learner

address. **4. Immediate Risk → Call 999**

If there is risk of:

- Violence
- Harm to others
- Imminent extremist activity

### **5. Channel Referral**

If Prevent officers agree threshold is met, the learner may be referred to Channel for voluntary support.

## 6. Recording

All Prevent actions are documented securely.

# 10.7 Prevent in Online AP Delivery

Staff must be alert to:

- Learners repeating extremist slogans in sessions
- Extremist symbols in backgrounds
- Online grooming during unmonitored periods
- Sudden secrecy about online groups
- Direct messages referencing extremist narratives
- Learners showing distress after consuming radical content

DSLs review:

- Attendance patterns
- Disclosures
- Online behaviours
- Welfare indicators

# 10.8 Building Resilience Through Curriculum (Mapped to Your Pathways)

Prevent is embedded in:

## Hair, Beauty, Nails

- Challenging stereotypes
- Respect and diversity
- Safe client interactions
- Anti-extremist messaging through wellbeing education

## Creative Media

Prevent and resilience-building are embedded within the Creative Media curriculum through:

- Promoting respectful and responsible digital citizenship
- Challenging stereotypes and misinformation online
- Encouraging critical thinking around media influence and online content
- Reinforcing respect, diversity and inclusion in digital spaces
- Addressing online extremism and harmful narratives through discussion, media analysis and wellbeing education

## **Sports & Fitness**

- Promoting teamwork, discipline and respect
- Addressing aggression and misogyny
- Redirecting harmful peer influences

## **Customer Service & Business**

- Communication and conflict management
- Recognising manipulative or coercive behaviour
- Understanding lawful vs. unlawful expressions

## **Online AP**

- Digital citizenship
- Critical thinking
- Identifying harmful content
- Algorithm awareness

# **10.9 Staff Training Requirements**

All staff must complete:

- Annual Prevent training
- Refresher updates where national threat levels change
- Training on online radicalisation
- Scenario-based training for vocational contexts

DSLs receive higher-level Prevent training.

# **10.10 West Midlands Prevent Contact Routes**

DSL consults based on learner home authority:

## **Coventry Prevent Team**

Via Coventry City Council / CTU link.

## **Walsall Prevent Team**

Accessed through Walsall Local Authority channels.

## **Birmingham Prevent Team**

Via Birmingham City Council / CASS pathways.

**Police Emergency:** 999

**Non-Emergency:** 101

# SECTION 11: DATA PROTECTION, INFORMATION SHARING & CONFIDENTIALITY

Empowering Futures Alternative Provision processes personal data, including sensitive and special category information, in line with:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Working Together to Safeguard Children 2023
- KCSIE 2025
- Human Rights Act 1998
- Counter-Terrorism and Security Act 2015 (Prevent Duty)
- Care Act 2014 (for adult safeguarding)

Safeguarding requires that staff understand **when information must be kept confidential and when it must be shared**, even without consent. The welfare of the learner (child or adult at risk) is always the primary consideration.

## 11.1 Principles of Data Protection in Safeguarding

Empowering Futures Alternative Provision adheres to the six lawful processing

principles: 1. **Lawfulness, fairness and transparency**

2. **Purpose limitation**

3. **Data minimisation**

4. **Accuracy**

5. **Storage limitation**

6. **Integrity and confidentiality (security)**

In safeguarding, the lawful bases most commonly used are:

- **Public Task** (exercising official authority and acting in the public interest)
- **Vital Interests** (protecting someone's life)
- **Legitimate Interests** (when appropriate for adult learners)

- **Legal Obligation** (statutory safeguarding duties)

For special category data (health, ethnicity, SEND, safeguarding concerns), processing usually falls under:

- **Substantial Public Interest** (safeguarding of children/vulnerable adults)
- **Provision of health or social care**
- **Protecting vital interests**

Consent is **not required** to share safeguarding information when a learner is at risk.

## 11.2 Confidentiality in Safeguarding

Confidentiality is NOT absolute. Staff must:

- Never promise confidentiality to a learner
- Share safeguarding information only with authorised people
- Escalate concerns immediately to the DSL
- Avoid discussing confidential issues in public areas
- Store all records securely in line with policy

Parents/carers may be informed **unless doing so places the learner at increased risk** or contradicts police or social care advice.

Adult learners (18+) are treated under Care Act principles:

- Consent is considered when appropriate
- But can be overridden for safety, proportionality or public protection

## 11.3 Information Sharing for Safeguarding Purposes

Empowering Futures Alternative Provision follows the seven golden rules of information sharing from Working Together 2023:

1. The welfare of the learner is paramount
2. Be open and honest where appropriate
3. Seek advice from DSL if unsure
4. Share with consent where possible, but do not allow this to prevent safeguarding
5. Consider proportionality and necessity
6. Ensure accuracy and security

## 7. Document decisions and rationale

Information may be shared with:

- Local Authorities (Coventry, Walsall, Birmingham)
- Social workers
- Police
- Schools and Virtual Schools
- Adult Social Care
- CAMHS and mental health services
- Early Help / family support teams
- Prevent teams
- Youth offending services
- Other AP providers involved in a transfer
- External vocational partners (via secure, limited information

sharing) Only information necessary for protecting the learner is shared.

# 11.4 Data Security and Storage

Safeguarding files include:

- Chronologies
- Incident reports
- Body maps (where relevant)
- DSL decisions and rationale
- Referral documentation
- Agency correspondence
- Risk assessments
- Online AP safeguarding reports

These are:

- Stored in restricted-access digital or locked physical systems
- Accessible ONLY to DSLs, Director, and authorised safeguarding personnel
- Never stored on personal devices
- Protected by encryption and secure login controls
- Not shared via unsecured email or messaging platforms

# 11.5 Digital and Online AP Data Protection

Given your online AP delivery, digital security is essential.

### **Staff must:**

- Use work-designated accounts/platforms only
- Never use personal emails, WhatsApp, or social media for learner communication
- Ensure devices are password-protected and not shared
- Avoid saving learner data to desktops or personal storage
- Share screenshots of safeguarding concerns **only** with DSLs using secure channels

### **Learners must:**

- Not record sessions
- Not share login details
- Attend sessions in private environments wherever feasible
- Understand basic data safety principles (included in learner

expectations) **Remote sessions:**

- Are recorded or monitored **ONLY** when formally authorised
- Are stored securely in line with retention rules
- Must not be shared outside of Empowering Futures

## **11.6 Rights of the Individual (Children & Adults)**

Under UK GDPR, individuals have rights to:

- Access their personal data (Subject Access Request)
- Request correction of inaccurate data
- Request restriction of processing
- Request erasure in limited circumstances
- Object to certain types of processing

**HOWEVER:**

These rights may be lawfully restricted **where safeguarding concerns override them**, including:

- Information relating to third parties
- Data involving ongoing investigations
- Records required by law
- Data that could cause harm if disclosed

DSLs must liaise with the Director before responding to SARs involving safeguarding records.

## 11.7 Data Retention (Safeguarding Records)

Records are held in accordance with statutory guidance and sector best practice. **Children's Safeguarding Files**

- Retained **until the learner's 25th birthday** (Under statutory school-age timeline and LA expectations, even for AP providers.)

### **Adult Learner Safeguarding Files**

- Retained for a **minimum of 6 years**, or longer if required by ongoing concerns or proceedings.

### **Serious incident files**

- May be retained indefinitely if required for legal, safeguarding or historical review purposes. **Online session safeguarding evidence**

- Retained only as long as necessary for safeguarding purposes or investigations. Upon transfer to another school, LA, care provider or AP:

- Files are transferred securely and directly
- A record is kept of the transfer date, recipient and method
- Files are never sent via unsecured email

## 11.8 Breach Reporting

Any data breach involving safeguarding information must be reported immediately to the Director and DSL.

A breach may include:

- Lost files
- Unauthorised access
- Incorrect emailing/sharing
- Misplaced digital documents
- Inappropriate access by staff

Serious breaches may require:

- Internal investigation
- Staff disciplinary action

- ICO notification (within 72 hours if required)
- Learner/parent notification if risk is significant

The Director leads data breach management with DSL oversight where safeguarding is affected.

## **11.9 Contractors and External Partners**

All contractors (beauty tutors, nail technicians, sports coaches, assessors) must:

- Follow Empowering Futures' Data Protection Policy
- Never store learner data on personal devices
- Only access data necessary for their role
- Follow secure sharing procedures
- Complete mandatory data protection training

Non-compliance is treated as a safeguarding concern.

## **11.10 Information Sharing with Families**

Parents/carers (for under-18s):

- Are informed appropriately when concerns arise
- May receive welfare updates
- Are NOT informed when doing so increases risk (DSL decision)

Adult learners:

- Are treated under adult safeguarding rules
- Have rights over their own information unless overridden for safety or statutory reasons

# **SECTION 12: SAFEGUARDING GOVERNANCE, QUALITY ASSURANCE & POLICY REVIEW**

Safeguarding at Empowering Futures Alternative Provision is driven by a clear governance structure overseen by senior leaders and Designated Safeguarding Leads. Governance ensures:

- Compliance with statutory guidance
- High-quality safeguarding practice
- Accountability at all levels
- Rigorous monitoring, reporting and improvement

- Strong multi-agency partnership working

This section outlines the specific roles and responsibilities across the organisation.

## 12.1 Organisational Safeguarding Structure

Empowering Futures Alternative Provision operates a multi-site alternative provision model including:

- Coventry main hub
- Satellite delivery in Walsall and Birmingham
- Online Alternative Provision (remote delivery)
- Off-site vocational environments (hair, beauty, nails, sports & fitness, customer service)

Safeguarding governance applies consistently across all delivery models. **Director &**

### Lead DSL

#### Rhean White

Holds ultimate responsibility for:

- Strategic safeguarding leadership
- Ensuring compliant policies and procedures
- Oversight of all reports, referrals and serious incidents
- Safer recruitment and SCR oversight
- DSL supervision and training
- Liaison with Local Authorities, Police, Prevent and regulatory bodies
- Ensuring online AP is safe and compliant
- Ensuring contractors meet safeguarding standards
- Reporting safeguarding performance to commissioners and external regulators

### Designated Safeguarding Lead (DSL)

#### Carla Wallis (Manager)

Responsible for:

- Day-to-day operational safeguarding
- Receiving and responding to concerns
- Recording and monitoring cases
- Multi-agency correspondence
- Early Help and threshold decisions
- Oversight of attendance safeguarding and CME
- Welfare calls, home communication and support
- Support for staff following disclosures
- Induction and annual refresher training delivery

- Supporting online AP safeguarding oversight

## **Deputy DSLs**

Where appointed, Deputy DSLs provide:

- Additional coverage across sites
- Out-of-hours safeguarding coverage where required
- Support in managing caseloads
- Consistent safeguarding leadership standards

Deputy DSLs must be trained to the same level as the DSL.

## **Safeguarding Responsibilities of Tutors and Staff**

Staff include beauty tutors, nail trainers, hair tutors, sports coaches, fitness instructors, academic support staff, customer service tutors and online AP facilitators.

They must:

- Recognise indicators of abuse, neglect, exploitation and radicalisation
- Report concerns immediately to the DSL
- Maintain professional boundaries across vocational and online settings
- Keep accurate registers for attendance safeguarding
- Follow safer working practices in practical sessions
- Contribute to EHCP reviews, Early Help and multi-agency meetings
- Support trauma-informed, SEND-sensitive approaches

Failure to follow safeguarding procedures is a disciplinary matter.

## **Responsibilities of Contractors and External Partners**

This includes:

- External assessors
- Visiting vocational specialists
- Community site tutors
- Temporary staff
- Agency workers

They must:

- Meet recruitment and DBS requirements
- Follow the Safeguarding Policy and Code of Conduct
- Report all concerns to the DSL
- Never store learner data on personal devices
- Follow all online AP rules if delivering remotely

## 12.2 Governance Processes

Empowering Futures Alternative Provision maintains a structured safeguarding governance framework including:

### 12.2.1 Safeguarding Strategy Meetings

**(Internal)** Led by the Director and DSL to review:

- Cases
- Trends
- Safeguarding risks across sites
- Attendance/CME risks
- Online AP patterns
- Vulnerability clusters (SEND, exploitation, mental health)
- Training needs
- Policy updates

Held at least **termly**, or more frequently if needed.

### 12.2.2 Safeguarding Audits & Quality Assurance

The Director ensures safeguarding standards through:

- Termly internal audits
- Annual full review
- Spot checks on recording systems
- Online AP monitoring
- Review of incident reports
- Health and safety checks in vocational settings
- Review of training compliance
- SCR compliance audits
- Case reviews following serious incidents

Audit findings form part of organisational improvement planning.

### 12.2.3 Multi-Agency Accountability

Empowering Futures works closely with:

- Coventry, Walsall and Birmingham LAs
- Schools and Virtual Schools

- Social workers
- Police
- Prevent teams
- CAMHS and community health services
- Youth offending teams
- SEND assessment teams

The DSL ensures accurate and timely responses to all multi-agency requests.

## **12.3 Staff Training, Competence & Supervision**

### **Training Requirements**

All staff receive:

- Induction safeguarding training
- Annual refresher safeguarding training
- Prevent Duty training
- Online safety training
- Low-level concern awareness
- Vocational-specific safeguarding (beauty, nails, sports etc.)
- SEND and trauma-informed practice training

DSLs receive:

- Advanced safeguarding training every 2 years
- Prevent and Channel training
- Attendance safeguarding and CME training
- Ongoing professional development

### **Supervision**

The Director provides professional supervision to the DSL, especially in complex case management or reflective safeguarding practice.

## **12.4 Safer Learning Environment Standards**

Empowering Futures ensures:

- Safe staffing ratios
- Clear behaviour expectations
- Professional boundaries
- Safe physical environments for vocational learning
- Online AP safety controls
- Regular risk assessments

- Accessibility for SEND learners
- Clear parental/carer communication

## 12.5 Policy Review

The Safeguarding Policy is reviewed:

- Annually (minimum)
- Following significant changes in legislation
- After serious incidents or emerging risks
- Following LA or Ofsted recommendations
- When expanding or modifying delivery models

The Director authorises all updates and ensures all staff receive revised versions.

## 12.6 Continuous Improvement

Empowering Futures Alternative Provision commits to ongoing enhancement of safeguarding through:

- Staff feedback
- Learner voice
- Parent/carer feedback
- Audit outcomes
- LA reviews
- Lessons learned from incidents
- Peer review from external partners where appropriate

# APPENDIX A: KEY SAFEGUARDING CONTACTS

## Internal Contacts – Empowering Futures Alternative Provision

### Lead DSL (Director)

Rhean White

Email: [rae@empowering-futures.co.uk](mailto:rae@empowering-futures.co.uk)

Phone: 07480122774

### DSL (Manager)

Rena Sparks

Email: [rena@empowering-futures.co.uk](mailto:rena@empowering-futures.co.uk)

Phone: 07393744887

## Local Authority Contacts

### Coventry

- MASH: 024 7678 8555
- Emergency Duty Team: 024 7683 2222
- LADO: 024 7697 5483
- Prevent Team: via Coventry City Council / CTU link

### **Walsall**

- MASH: 0300 555 2866
- Emergency Duty Team: 0300 555 2922
- LADO: 01922 650 487
- Prevent Team: via Walsall Local Authority

### **Birmingham**

- CASS: 0121 303 1888
- Emergency Duty Team: 0121 675 4806
- LADO: 0121 675 1669
- Prevent Team: via Birmingham City Council

### **Police**

- Emergency: **999**
- Non-Emergency: **101**

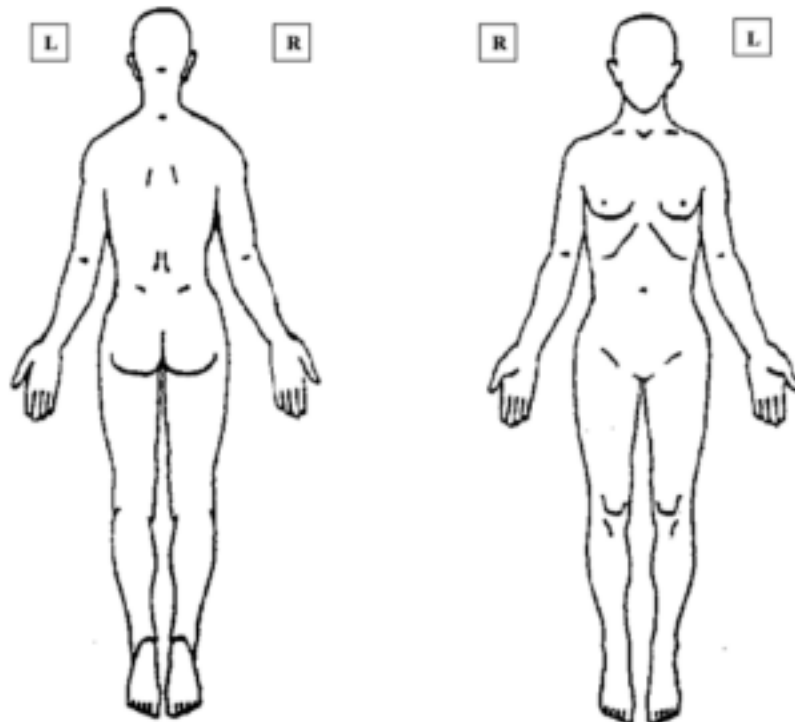
### **National Support Agencies**

- NSPCC: 0808 800 5000
- Childline: 0800 1111
- National Domestic Abuse Helpline: 0808 2000 247
- Forced Marriage Unit: 020 7008 0151

## **APPENDIX B: BODY MAP TEMPLATE**

*(To be used only where marking visible injuries is necessary. Staff must never examine a learner; record only what is visible or disclosed.)*

# Gender Neutral Body Map



Fields:

- Learner name
- Date and time
- Staff completing form
- Description of injury
- Body map marking with initials
- Explanation given by learner (in their own words)
- Action taken
- DSL signature

## **APPENDIX C: SAFEGUARDING CONCERN FORM**

To be completed immediately following any disclosure or concern.

### **Learner Information**

- Name
- DOB
- Programme/Pathway (Hair, Beauty, Nails, Sports, Fitness, Customer Service, Online AP etc.)

- Parent/carer (if applicable)
- LA responsible (Coventry/Walsall/Birmingham)

#### **Concern Details**

- Date/time of concern
- Location (in-centre, satellite, online session, off-site)
- Description of concern (factual, objective)
- Learner's own words (if disclosed)
- Observations (appearance, behaviour, environment)

#### **Action Taken**

- Who was informed
- Time DSL notified
- Any immediate actions taken
- Additional comments

#### **Staff Member Signature**

**DSL Decision & Notes**

**Follow-up actions**

## **APPENDIX D: ONLINE SESSION EXPECTATIONS (LEARNER VERSION)**

These apply to **all learners**, including those aged 18+.

### **What Learners Must Do**

- Join on time
- Keep camera on unless agreed
- Attend from a safe, private environment
- Dress appropriately
- Follow tutor instructions
- Treat others respectfully
- Use only Empowering Futures platforms

### **What Learners Must Not Do**

- Record sessions
- Take screenshots or photos
- Allow others to appear on camera
- Use inappropriate language
- Share login details
- Message staff outside approved platforms
- Behave in a threatening or abusive manner

## **If You Feel Unsafe Online**

Contact:

- DSL
- Tutor
- Parent/carer
- Any staff member
- Local Authority worker
- Childline (if under 18)

# **APPENDIX E: LOW-LEVEL CONCERN REPORTING FORM**

### **Staff Member Reporting Concern**

- Name
- Role
- Date & time

### **Description of Concern**

- Behaviour observed
- Context
- Impact on learners or staff
- Whether repeated behaviour

### **Does it Breach Staff Code of Conduct?**

Yes / No / Unsure

### **Has the Staff Member Been Spoken To?**

Yes / No

### **DSL Use Only**

- Decision
- Guidance issued
- Monitoring plan
- Escalation to LADO (if patterns emerge)

# **APPENDIX F: LADO FLOW SUMMARY**

Used when **allegations are made against staff, contractors or volunteers. 1.**

### **Receive allegation**

- Ensure learner safety
- Inform DSL immediately

## **2. DSL assessment**

Does the allegation involve:

- Harm or risk of harm?
- Possible criminal offence?
- Behaviour that may indicate risk?

## **3. Contact LADO within 1 working day**

- DSL consults appropriate LA LADO
- No internal investigation beforehand

## **4. LADO directs next steps**

Could include:

- Strategy meeting
- Police involvement
- Suspension or alternative duties
- Investigation timelines

## **5. Record keeping**

- Full log kept in secure safeguarding file

# **APPENDIX G: DEFINITIONS SUMMARY**

A concise version of the definitions in Section 3 covering:

- Abuse and neglect
  - Physical, emotional, sexual abuse
  - Criminal and sexual exploitation
  - Domestic abuse
  - Peer-on-peer abuse
- Radicalisation
- FGM
- Online abuse
- SEND vulnerabilities
- Adults at risk categories

This appendix provides quick reference for staff.

# **APPENDIX H: STAFF CODE OF CONDUCT SUMMARY POSTER**

A short, visually clear reminder of expectations.

**Staff Must:**

- Maintain professional boundaries
- Use authorised communication only
- Report concerns immediately
- Dress and behave professionally
- Keep sessions safe (online & in-person)
- Uphold British Values
- Model respectful behaviour

**Staff Must Not:**

- Share personal contact details
- Socialise with learners outside provision
- Use personal devices for teaching
- Allow unsupervised contact in vocational areas
- Breach confidentiality
- Ignore safeguarding concerns

This summary complements the full Code of Conduct embedded in Section 4.