

# Safeguarding Policy

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# Safeguarding Children and Young People

## Policy Statement

The purpose of this policy statement is:

- To protect, children and young people who receive EBP South services from harm.
- To provide staff and volunteers with the overarching principles that guide our approach to child protection.

This policy applies to anyone working on behalf of EBP South, including senior managers, the board of trustees, paid staff, volunteers, sessional workers, agency staff and students.

This policy has been drawn up based on legislation, policy and guidance that seeks to protect children and young people in the UK.

### We recognise that:

- The welfare of the child or young person is paramount.
- All children and young people, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have the right to equal protection from all types of harm or abuse.
- Working in partnership with children, young people, their parents, carers, guardians and their agencies is essential in promoting children and young people's welfare.

### We will seek to safeguard children and young people by:

- Valuing, listening to and respecting them.
- Ensuring our policies and procedures are compliant with current safeguarding legislation and guidance.
- Ensuring all staff working for EBP follow the Safeguarding Code of Conduct.
- Recruiting staff and volunteers safely, ensuring all necessary checks are made.
- Sharing information about how we safeguard children and young people we work with, and their parents, carers, guardians, our staff and volunteers.
- Sharing information about concerns with the educational establishment (school/college/sixth form) or other relevant agencies as appropriate.
- Providing effective management for staff and volunteers through supervision, support and training.

### Prevent

'Risk of radicalisation' is recognised as an issue of safeguarding with regards to children and young people. EBP South recognises its responsibilities under the government's strategy to stop people becoming terrorists or supporting terrorism. This relates to the vulnerabilities of some children and young people to radicalisation or becoming engaged in extremism.

EBP South will ensure that all staff working with children and young people are fully aware of the PREVENT duty. Opportunities to explore the issues with regards to the child or young person and volunteers they work with will be provided.

### Areas of work specific to the role of the EBP

The majority of EBP South's work with children and young people takes place within an educational context, i.e. during the school/college/sixth form day where students are under the care of the educational establishment. We recognise that the educational establishment has overall responsibility for the protection of children or young people in their care and we will always work closely with the establishment's Designated Lead Safeguarding Lead (DSL), should any matter of concern arise.

We also recognise that many EBP South activities involve volunteers from business who may have little experience of children or young people and who are bringing their business expertise voluntarily to support our work and the work of educational establishments.

With regards to the organisation of work experience, EBP South's role is to advise the educational establishment, parents, carers, guardians, and students of the suitability of the placement, and to ensure that all parties are aware of their legal responsibilities regarding child protection and safeguarding.

Regarding non-school programmes organised by EBP South, the procedures outlined on pages 6 and 7 of this Policy will apply and any required action will be escalated by EBP South's DSL.

Chief Executive Signature: *Richard Kennett*  
Richard Kennett (Dec 4, 2024 14:18 GMT)

Date: 04/12/24

Trustee Safeguarding Lead Signature: *Adam Lupton*  
Adam Lupton (Dec 4, 2024 14:33 GMT)

Date: 04/12/24

Date of last review: November 2023

Date of next review: January 2025

## **Staff Competence**

EBP South will ensure that all staff are aware of their safeguarding responsibilities by:

- Ensuring that every member of staff and volunteer receives appropriate levels of training to fulfil their safeguarding responsibilities effectively.
- Ensuring that managers and key staff working with children and young people read Part 1 and comply with the DfE's Keeping Children Safe in Education Guidance.
- Ensuring that safe selection and recruitment procedures are always followed.

## **Training and Development**

Safeguarding is an integral part EBP South's annual training and development plan. All staff working with children and young people will receive annual training in line with the role and responsibility they have within the organisation and at minimum, staff working directly with children and young people will receive basic safeguarding training.

- Managers who hold relevant posts will undergo more intensive training which involves developing skills in integrated working, holistic assessment of children, young people and their families and advanced safeguarding training. Additional training will be given to senior managers with a responsibility for leading integrated working and safeguarding practice within the organisation.
- Volunteers' training will be specific to the role. All volunteers participating in events in an educational establishment will be issued with guidelines in the Business Pack, which is issued prior to an event. There will also be a briefing given at the start of each event, reminding volunteers of their roles and responsibilities.
- Volunteers participating in residentials, out of education hours or who have significant, ongoing contact with children or young people will be required to undertake a basic safeguarding course if they:
  - Have not participated in training in the preceding 3 years. They will be offered training updates every three years.
  - Relevant staff will also be required to undertake Risk Assessment Training.

## **Appropriateness of Activities and Risk Assessments**

Some of these areas are also covered within the Health & Safety Policy. However with regard to Safeguarding EBP will ensure that:

- All activities are well planned and are appropriate to the students' needs. In doing such planning we will have regard to the target age range of each activity.
- Ensure that Employer Premises Health & Safety Verification forms are completed for all activities off school site (see Health & Safety Policy).
- Where requested, give copies of Employer Premises Health & Safety Verification forms to schools including any information they may need to ensure that students are properly prepared for the activity.
- Local Authority guidance for off-site activities and hazardous pursuits is followed and advice is sought from the relevant local authority outdoor education staff where appropriate.

## Disclosure & Barring Service Checks

In accordance with legislation, it is the policy of EBP that all those who carry out regulated activity, as defined by the Disclosure and Barring Service, are required to have an Enhanced DBS check with barred list. Those whose work involves frequent work with children or young people but not regulated activity will have an enhanced check. (All staff and volunteers who have long term or permanent positions and require DBS checks will be registered on the update service).

## DBS Checks and Volunteers from Business

Volunteers from business are central to EBP work and carry out a wide range of roles within EBP programmes. These may include hosting workplace visits, giving talks in schools, mentoring students on work related challenges and supporting work related activities in schools.

DBS checks at an enhanced level will be carried out for any volunteer who falls into the following category:

- A mentor – anyone acting in a support or advisory capacity with an individual or small group of young people over a period of time (if this falls under the definition of regulated activity this will include a check on the barred list).
- Any business volunteer who has made a commitment to be involved in EBP activities frequently (once a week or more often), or on 3 or more days in a 30-day period.

Most business volunteers do not have regular contact with any individual or group of young people and are not expected to be in a supervisory role with students. Both in education settings and EBP South off-site events, there is an expectation that a staff member from the education setting will be present to support and supervise students.

We will ensure that all education settings are aware of these distinctions by ensuring this forms part of our Service Level Agreements with them, by putting our Safeguarding Policy on our website, and by making it available to any member of staff from an education setting.

As part of EBP South's ongoing commitment to Quality Assurance, staff who are authorised to carry out DBS checks will undertake DBS re-checks on all relevant staff and volunteers at no more than 3-yearly intervals. Not applicable if registered with DBS Updating Service.

## DBS Checks and Work Experience

Work placements can take place over a 2-week period, or more extended periods of up to several days a week for up to 2 years. DBS guidance states that *anyone who teaches, trains, instructs or provides guidance to children or young people on a regular basis is carrying out regulated activity, and is eligible for an Enhanced DBS Check with a check of the children's barred list.*

This will apply to anyone who supervises a child or young person on work experience in the following scenarios:

- Someone supervising a child aged under 18 who is doing work experience that **is not part** of the child's usual employment (including voluntary work).
- Someone supervising a child aged under 16 who is doing work experience that **is part** of the child's usual employment (including voluntary work).
- Someone supervising a child aged 16 or 17 who is on a work experience placement arranged by their school or as part of the Duke of Edinburgh Award, if the supervisor has been employed specifically for the purpose of carrying out a regulated activity with the child.

In all these scenarios, the supervisor must be carrying out the regulated activity at least once a week or three or more times in a 30-day period to be eligible for an Enhanced Check.

In line with DBS recommendations, EBP will also consider the need for DBS checks in the following cases:

- Where the student is particularly vulnerable for education, medical, behavioural or home circumstance reasons.
- Where the placement is over an extended period of time, particularly where it involves:
  - Regular lone working with an employer over long periods.
  - Placements located in isolated environments.
  - Placements involving a high degree of travel.
  - Placements which include a residential element.

In these situations, EBP competent staff will carry out and record their assessment of the risk and will initiate a DBS check (e.g. Supported WEX, WEX – Full service) or where an educational establishment needs to undertake one we will advise them and record this (e.g. Extended WEX – Own Placement or WEX Block Placement Own Placement). Until all checks have been completed, EBP South will not authorise the placement.

#### **Guidance to work placement providers and business volunteers**

EBP South will provide written guidance to business volunteers and to placement providers outlining their responsibilities regarding child protection and safeguarding. This will include action to take in the event of disclosure of abuse from a child or young person, or concern of abuse. In all cases the first action is not to promise confidentiality, take notes and speak to the coordinator responsible for the activity. Written guidance will be supported by briefings at the start of events and/or when carrying out health & safety checks with employers.

EBP will provide more detailed training for mentors and those in frequent or intensive contact with children or young people, regarding safeguarding.

#### **Low Level Concerns procedure**

It may be possible that an employee, volunteer or employer/business acts in a way that does not cause risk to children or young people but is however inappropriate. Any member of staff who has a concern about an adult working for or on behalf of EBP should inform the DSL (EBP South) about their concern. If the DSL cannot be contacted, the CEO should be contacted instead.

Part of EBP South approach to safeguarding should ensure that we promote an open and transparent culture in which all concerns about all adults working in or on behalf of EBP South are dealt with promptly and appropriately.

Creating a culture in which all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should encourage an open and transparent culture; enable EBP South to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of EBP South are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of EBP South.

## **Confidentiality**

In line with, the Data Protection Act 2018, GDPR and the Human Rights Act 1998, EBP South will keep confidential all information on an individual that is of a personal or sensitive nature. Where there are concerns about a child or young person's welfare, the Children Act 1989, enhanced by Children Act 2004 permits the disclosure of information necessary to safeguard a child or young person.

## **Procedure for the use, storage of photography and digital media**

It is EBP policy to celebrate and promote the achievements of children and young people through the press, social media and other appropriate media.

Photography and recorded images of children and young people are an integral element of our work. It is essential that the images are not inappropriately misused or adapted; therefore, the following guidance must be followed:

- Written consent must be sought and obtained prior to any event. Parents, carers, guardians, the child or young person themselves have the right to decline permission to have their pictures taken and understand how those images may be used.
- The nature and purpose of the images should be made explicit in the literature.
- Personal details should not accompany or be published alongside the name.
- Images will be stored securely, in line with the Data Protection Policy and they will be deleted as soon as they are no longer required.

## **EBP Key Employees**

Designated Safeguarding Leads (DSL):

- Sammy Ward – Head of Business, Events, Marketing and Work Experience [sward@ebpsouth.co.uk](mailto:sward@ebpsouth.co.uk)
- Eleanor Cameron – Head of Education, Careers and Quality [ecameron@ebpsouth.co.uk](mailto:ecameron@ebpsouth.co.uk)
- Matt Barnard – Work Experience Manager [mbarnard@ebpsouth.co.uk](mailto:mbarnard@ebpsouth.co.uk)
- Richard Kennett - CEO [rkennett@ebpsouth.co.uk](mailto:rkennett@ebpsouth.co.uk)
- Adam Lupton - Lead Trustee for Safeguarding [enquiries@ebpsouth.co.uk](mailto:enquiries@ebpsouth.co.uk)

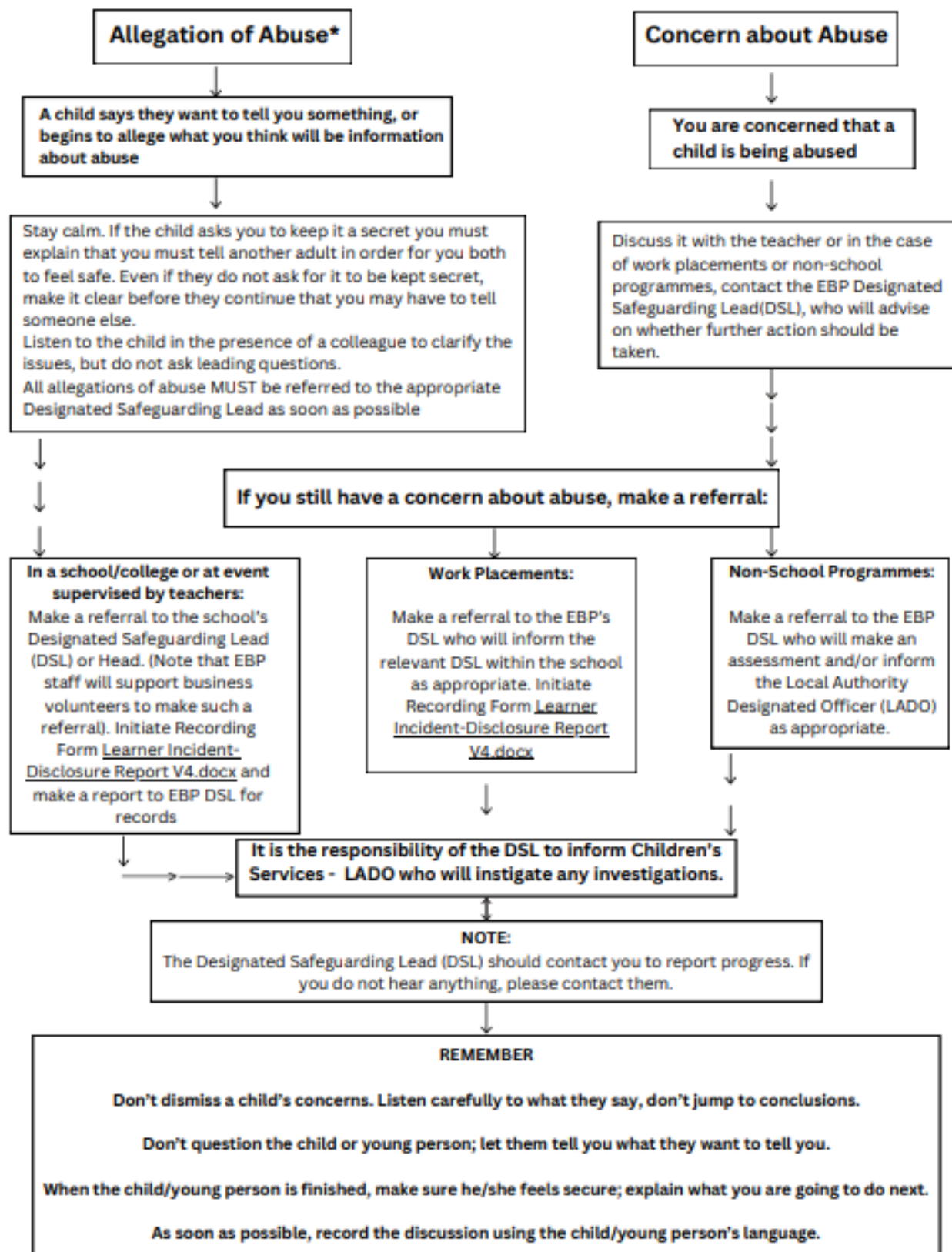
## **Forms referred to in this document:**

[Learner Incident-Disclosure Report V4.docx](#)

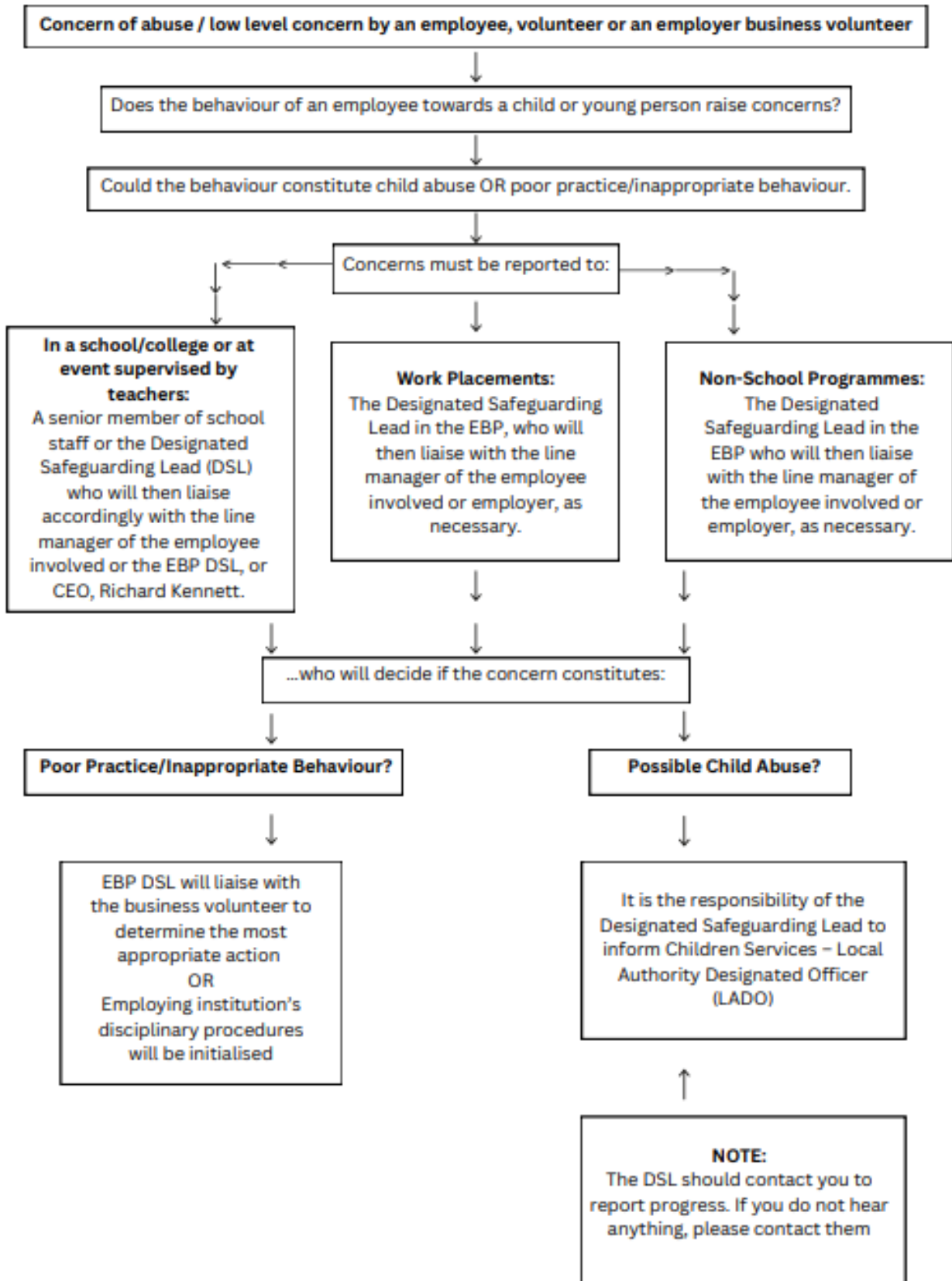
## Procedures

To be followed by all EBP employees and volunteers (including business volunteers and work placement providers). Anyone may make a referral.

\* The term "Abuse" in this context includes 'Risk of Radicalisation'







### **DBS Checks Eligibility**

Due to the nature of the work that EBP South do and that there will be regular contact with children and young people, EBP South will ensure all its staff undertake an Enhanced DBS which includes the appropriate Barred List.

### **Action on reply from DBS**

Within EBP South it is the responsibility of the Executive Manager, Designated Safeguarding Leads with support of Senior Management to determine the appropriateness of an individual to undertake a particular role, if they have prior offences, based on the following criteria:

- The DBS system will either confirm that the check was clear, or state that it is 'in the post.'
- If all clear, the appointment can go ahead subject to any other outstanding checks.
- If 'in the post' the applicant should be invited to meet with the DSL or another Senior Manager at EBP and to bring in their DBS for further discussion.

Any decision to appoint will then be dependent on the outcome of the discussion and the exact nature of the offence(s). Some offences will automatically exclude a person from working with children and young people. These include:

- Violence,
- Abuse,
- Sexual offences,
- Any significant or recent pattern of offending.

Decisions based on other offences will be dependent on the nature of the offence(s), date of the offence(s) (i.e. how recent) and the applicant's attitude to the offence(s).

Decisions will be made by the Executive Manager, DSL's in conjunction with another Senior Manager and will be recorded.

## **Categories of Abuse**

It is vital that all practitioners have an operational knowledge of the possible signs and symptoms of abuse. This guide should be used as a starting point to explore both personal values and attitudes and identify learning needs. There are some behaviours, which denote the possibility of any form of abuse, such as:

- Marked change in the child or young person.
- Aggression.
- Withdrawn.
- Developmental delay.
- Loss of concentration.
- Poor self-esteem.
- Substance misuse.

### **Neglect**

This occurs when a child or young person's persistent failure to thrive is primarily attributable to the parent or carers or guardians care. Behaviours associated include failing to provide for the child or young person's basic needs, food, shelter, clothing, exposure to danger, access to appropriate health care, treatment, or education. It may also comprise neglect of, or unresponsiveness to, a child or young person's emotional needs. Signs that may suggest neglect:

- Dirty, unkempt presentation and/or a poor record of health care.
- Persistently undersized or underweight.
- Unable to concentrate.
- Preoccupied with food.
- Continually appears tired or lacking in energy.
- Frequent injuries due to lack of supervision.

### **Special considerations including bullying**

Bullying is increasingly being recognised as a form of abuse. It is particularly significant to children and young people, who have identified bullying as one of their primary concerns. Bullying can be defined as deliberately hurtful behaviour, over a period of time, or any occasion where someone deliberately intimidates or harasses another person. Behaviours include:

- Verbal and/or physical attacks.
- Name-calling, undermining and/or spreading malicious gossip.
- Threats.
- Graffiti.
- Stealing and/or taking possessions.

- Receiving abusive text messages, emails, or inappropriate images transferred by mobile phone cameras.
- Coerced to act against their will.

### **Emotional**

Emotional abuse is the persistent ill-treatment of a child or young person as to cause severe and persistent adverse effects on the child or young people's emotional development. This includes telling or indicating to the child or young person that they are worthless, unloved or inadequate. It may involve seeing or hearing the ill-treatment of another person. Parents or carers or guardians may place inappropriate expectations, or attempt to expose, exploit, and corrupt the child or young person. Increasingly, the effects of bullying are being recognised within this area. Signs that may suggest emotional abuse:

- Excessive behaviour patterns, e.g. bedwetting, overeating.
- Self-harm.
- Persistently absconds.
- Display high levels of anxiety, unhappiness, or withdrawal.
- Attention seeking or avoidant behaviours.
- Scape-goating and victimising.
- Subjected to frequent and recurrent verbal abuse.
- Young carers and children who are living in families with a history of domestic violence.

### **Physical**

Abusive behaviour within this category may involve hitting, throwing, shaking, poisoning, bruising, burning or scalding, drowning, suffocating, failing to prevent and causing injuries by omission or failing to act. It also includes the parent or carer or guardian fabricating the symptoms of, or deliberately inducing illness in a child or young person. Signs that may suggest physical abuse:

- Bruising, particularly to a pre-mobile baby.
- Multiple bruising to different parts of the body.
- Finger marks.
- Visual correlation to belts or other implements.
- Burns, bald patches and bites.
- Does not expect to be comforted.
- An injury for which there is no adequate explanation.
- Subjected to frequent and recurrent verbal abuse.

### **Sexual**

Behaviours, which constitute this category, are forcing or enticing a child or young person to take part in sexual activities, whether or not the child or young person is aware or able to give consent to

what is happening. This includes both penetrative and non-penetrative acts, (including looking at pornographic material and encouraging a child or young person to behave in sexually inappropriate ways). Signs that may suggest sexual abuse:

- Sexualised behaviour and play.
- Inappropriate sexual knowledge for their age.
- Urinary tract infections, sexually transmitted diseases or underage pregnancy.
- Soiling and wetting.
- Regressive behaviour.
- Emotionally isolated.
- Sleep disturbance.

### **Domestic Violence**

The effect of domestic violence on children or a young person is such that it must be considered as abuse. Either witnessing it or being the subject of it is not only traumatic in itself but is likely to adversely impact on a child or young person and it should be treated as physical or emotional abuse as appropriate.

### **Risk of Radicalisation**

Radicalisation is defined as the process by which people come to support terrorism and extremism, and in some cases, to then participate in terrorist groups.

Extremism is the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

Three aspects need to be considered when identifying the risk:

#### ***Engagement with a group, cause or ideology.***

Engagement factors are sometimes referred to as “psychological hooks”. They include needs, susceptibilities, motivations and contextual influences and together map the individual pathway into terrorism, for example:

- Feelings of grievance and injustice.
- Feeling under threat.
- A need for identity, meaning and belonging.
- A desire for status.
- A desire for excitement and adventure.
- A need to dominate and control others.
- Susceptibility to indoctrination.
- A desire for political or moral change.
- Opportunistic involvement.
- Family or friends’ involvement in extremism.
- Being at a transitional time of life.

- Being influenced or controlled by a group.
- Relevant mental health issues.

### ***Intent to cause harm***

Not all those who become engaged by a group, cause or ideology go on to develop an intention to cause harm, so this dimension is considered separately. Intent factors describe the mindset that is associated with a readiness to use violence and address what the individual would do and to what end. They can include:

- Over-identification with a group or ideology.
- ‘Them and Us’ thinking.
- Dehumanisation of the enemy.
- Attitudes that justify offending.
- Harmful means to an end.
- Harmful objectives.

### ***Capability to cause harm***

Not all those who have a wish to cause harm on behalf of a group, cause or ideology are capable of doing so, and plots to cause widespread damage take a high level of personal capability, resources and networking to be successful. What the individual is capable of is therefore a key consideration when assessing risk of harm to the public. Factors can include:

- Individual knowledge, skills and competencies.
- Access to networks, funding or equipment.
- Criminal Capability.

### **A useful way of remembering the potential vulnerability indicators is BIGMAC:**

#### **1. Behaviour**

Mental or physical health of concern.  
Worrying changes in appearance or activities.

#### **2. Identity**

Seeking meaning or belonging.  
Discontent and disaffection.

#### **3. Grievance**

Victim/witness to hate crime.  
Them and Us mentality.

#### **4. Motivation**

Religious, political, ideological, cultural or personal.

#### **5. Attitude**

Towards criminal behaviour, violence, control, dominance.

#### **6. Capability**

Knowledge, skills and competencies to harm.









# Safeguarding Policy

Final Audit Report

2024-12-04

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