

GEM Partnership Ltd Safeguarding Children and Vulnerable Adults Policy

1.1 Purpose

1.2 To provide a duty of care to ensure learners, workers and staff are safe.

2.1 Scope

2.2 Primarily under 19-year-olds or vulnerable adults, however, it is company policy to follow safeguarding guidance for all learners, workers and staff. This policy work's closely with the GEM Partnership's Anti Bullying and Harassment Policy, Sexual Harassment Policy and Modern Slavery Policy.

3.1 Policy Statement

3.2 Gem Partnership are committed to the safeguarding and welfare of all our staff, learners, workers and other relevant stakeholders.

3.3 The scope of this policy covers all individuals, regardless of age, gender, disability, ethnic origin, religion, or sexual orientation, has the right to be protected from harm, abuse, and exploitation.

3.4 Gem Partnership are committed to creating a safe learning environment where learners feel respected, supported, we will regularly monitor arrangements to ensure this. Always acting in the best interests of learners to protect them online and offline, including when they are receiving remote education. Gem Partnership will act in accordance with relevant local safeguarding legislation and best practices to ensure that appropriate safeguards are always in place and details of reporting concern are clearly outlined in our Safeguarding policy.

3.5 GEM Partnership recognises that it has duty to help staff, workers and learners recognise their responsibilities (through information, guidance, support and training) GEM Partnership will abide by the safer recruitment guidelines when employing staff. Staff are trained to handle disclosures with care and sensitivity, ensuring that the welfare of the workers and learners is always the priority.

3.6 This policy takes in account, amongst others, the following:

3.6.1 Care Act 2014

3.6.2 Children Act 2004

3.6.3 Keeping Children Safe in Education 2026 (effective 1st September 2026)

3.6.4 Working Together to Safeguard Children 2023

3.6.5 Generative artificial intelligence (AI) in education 2025

3.6.6 Prevent Duty Guidance (2019)

3.6.7 Human rights act 1998

3.6.8 Sexual Offences Act 2003

3.6.9 Care standards Act 2000

3.6.10 Health and Social Care Act 2008

3.6.11 The Education and Training (Welfare of Children) Act 2021

3.6.12 Review of Sexual Abuse in Schools and Colleges (2021)

3.6.13 Mental Capacity Act 2005

3.6.14 Equality and Diversity 2010

3.6.15 Domestic Abuse Act 2021

3.6.16 Counter-Terrorism and Security Act 2015

3.6.17 Online Safety Act 2023

3.6.18 Victims and Prisoners Act 2024 (Operation Encompass provisions)

3.7 Our policy is reviewed on an annual basis. Feedback from learners, staff, and stakeholders will be taken into consideration to continually improve our safeguarding practices.

3.8 Our designated safeguarding lead (DSL) is Kelly Lee and they can be contacted at 07834 732088 or Kelly.Lee@gempartnership.com.

4 Definition of Safeguarding

- 4.1 In recent years there has been increasing concern about the safety and welfare of both children and young adults. Safeguarding is defined by the Children Act 1989 and Joint Chief Inspectors Report on Arrangements to Safeguard Children (2002) as the meaning that;
 - 4.1.1 “Agencies (and organisations) working with children and young people take all reasonable measures to ensure that the risk of harm to the individual’s welfare are minimised; and welfare, all agencies (and organisations) take all appropriate actions to address those concerns, working to agreed local policies and procedures, working in partnership with other local agencies.”
- 4.2 The Care Act statutory guidance defines adult safeguarding as:
- 4.3 “Protecting an adult’s right to live in safety, free from abuse and neglect. It is about people and organisations working together to prevent and stop both the risks and experience of abuse or neglect, while at the same time making sure that the adult’s wellbeing is promoted including, where appropriate, having regard to their views, wishes, feelings and beliefs in deciding on any action. This must recognise that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances.”

5 GEM Partnerships Position on Safeguarding

- 5.1 Training Providers have not been specifically named in their duty to safeguard and protect, unlike primary and secondary schools and further education colleges that have a statutory duty to safeguard and protect children or young people in their care.
- 5.2 Training Providers however do have a common law duty of care to take such steps that in the circumstances of an educational institution are reasonable to ensure that the child or a young person is safe, and in the absence of specific requirements, be seen to have an enhanced duty of care. This may at times involve triggering of disciplinary action linking the Anti Bullying and Harassment Policy and/or the Sexual Harassment Policy.
- 5.3 Additionally, GEM Partnership as a training and recruitment business notes that criminal offences that may be committed in connection with the welfare of children and vulnerable adults, in particular those involving abuse of trust which prohibits staff from engaging with or encouraging sexual activity with workers or students who are under the age of 18. This policy makes protection responsibilities clear and gives GEM Partnership the ability to dismiss or otherwise discipline employees who fail this duty.

6 Safeguarding Children

- 6.1 The Children Act 1989 states the legal definition of Children means everyone under the age of 18 ‘Young person’ is not legal term, for the purposes of the policy and procedures, a young person is someone who might not perceive themselves as a child, but who is still in the age range of the legal definition, and therefore, fall within the term ‘child’.
- 6.2 Children may be seen as vulnerable if they are:
 - 6.2.1 Young carers
 - 6.2.2 Pregnant or are a parent
 - 6.2.3 Have family members in prison
 - 6.2.4 Have exhibited abusive or violent behaviours
 - 6.2.5 Privately fostered
 - 6.2.6 Have experienced parental offending
- 6.3 GEM Partnership adopts a child-centred approach to safeguarding. At all times staff will consider what is in the best interests of the child and ensure the child's voice is heard when decisions affecting their welfare are made. Staff should maintain an attitude of "it could happen here" and act immediately where concerns arise.

7 Safeguarding Vulnerable Adults

- 7.1 The legal and policy basis for responding to concerns regarding the safeguarding and welfare of vulnerable adults is different from that of children and young people under 18. Working

together to Safeguard Children 2018 only applies to children and young people until they reach the age of 18.

- 7.2 Any incidents or concerns relating to a young person of 18 years or over, even if still at school, are not covered by Local Safeguarding Children Boards or their procedures.
- 7.3 Government guidance in relation to adults is contained in the Care Act 2014, adults are no longer deemed vulnerable because of their personal attributes, characteristics or abilities.
- 7.4 An adult is considered 'vulnerable' if they receive a health, personal or social care service from a professional. Personal services would include, for example, help with financial matters, feeding, washing or dressing.
- 7.5 A vulnerable adult is someone over 18 who, due to their age, disability, mental health issues, illness, or other circumstances, is at risk of harm and unable to protect themselves from exploitation

8 The Definition of Abuse of Adults and Vulnerable Adults

- 8.1 Abuse is a violation of an individual's human and civil rights by another person or persons. Abuse may consist of single or repeated acts. It may be physical, verbal or psychological, it may be an act of neglect or omission to act, or it may occur when a vulnerable person is persuaded to enter into a financial or sexual transaction to which he or she has not consented or cannot consent. Abuse can occur in any relationship and may result in significant harm to, or exploitation of, the person subjected to it.
- 8.2 Abuse can take the form of:
 - 8.2.1 Physical abuse – including hitting, pushing, kicking, misuse of restraint or inappropriate sanctions including by their peers
 - 8.2.2 Sexual abuse – including emotional abuse, threats, deprivation of contact, humiliation, intimidation, coercion, controlling behaviour, verbal abuse, sexual harassment and violence, rape, sexual exploitation, grooming, online sexual abuse, language and consent, isolation, domestic abuse or withdrawal from services
 - 8.2.3 Financial or material abuse – including exploitation and pressure in connection to wills, property, inheritance or financial transactions
 - 8.2.4 Neglect or acts of omission – including ignoring medical or physical care needs, withholding of medication or adequate nutrition and failure to provide access to appropriate health, social care or educational services discriminatory abuse – including racist, sexist and other forms of harassment.
 - 8.2.5 Grooming or sexual exploitation
 - 8.2.6 Cyber bullying
 - 8.2.7 Modern Slavery – can take many forms including the trafficking of people, forced labour, servitude and slavery. Modern slavery is where one person controls another for profit by exploiting a vulnerability. Usually, the victim is forced to work or is sexually exploited, and the trafficker keeps all or nearly all of the money. The control can be physical, financial or psychological. Please refer to GEM's Modern Slavery and Remediation Policy for further information.

9 Low-Level Concerns

- 9.1 A low-level concern is any concern about an adult's behaviour towards a child or vulnerable person that does not meet the allegation threshold (as referred to in clause 8) or is not otherwise serious enough to consider a referral to the Local Authority Designated Officer (LADO).
- 9.2 A low-level concern is any concern – no matter how small, and even if no more than a 'nagging doubt' – that an adult may have acted in a manner which is:
 - 9.2.1 inconsistent with the terms detailed in the GEM Partnership Code of Conduct and Trainer Standards, including inappropriate conduct outside of work, and
 - 9.2.2 does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the Local Authority Designated Officer (LADO).

- 9.3 Examples of such behaviour as cited in Keeping Children Safe in Education 2025 could include, but are not limited to:
 - 9.3.1 being over friendly with learners;
 - 9.3.2 having favourites;
 - 9.3.3 taking photographs of students on their personal mobile phone;
 - 9.3.4 engaging with a learner on a one-to-one basis in a secluded area or behind a closed door
 - 9.3.5 Humiliating learners
- 9.4 Low-level concerns may arise in several ways and from a number of sources (eg. suspicion, complaint or disclosure made by a learner, parent or another adult outside of the organisation, or as a result of vetting checks undertaken. Where an individual has 'low-level' concerns about a member of staff, worker, contractor, visitor, or learner this should be reported to one of the Designated Safeguarding Officers at the earliest opportunity.
- 9.5 It is equally important that an individual is able to share such information about themselves, where they feel a situation may be misinterpreted or might appear compromising to others and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

10 Child-on-child Abuse

- 10.1 All staff should recognise that children are capable of abusing other children (including online).
- 10.2 All staff should be clear about their company policy and procedures with regard to child-on-child abuse.
- 10.3 The different forms of child-on-child abuse can take the form of:
 - 10.3.1 bullying (including cyberbullying, prejudice-based and discriminatory bullying)
 - 10.3.2 abuse in intimate personal relationships between children (also known as teenage relationship abuse)
 - 10.3.3 physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
 - 10.3.4 abuse referred to or passed off as "banter", "just having a laugh", "part of growing up"
 - 10.3.5 sexual violence and sexual harassment
 - 10.3.6 consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
 - 10.3.7 Forcing someone to engage in sexual activity without consent
 - 10.3.8 Upskirting
 - 10.3.9 initiation/hazing rituals
 - 10.3.10 Misogynistic behaviour
 - 10.3.11 Misandrist behaviour
 - 10.3.12 Serious physical assault with weapons
 - 10.3.13 Online abuse (including AI-generated intimate images, deepfake imagery, online coercion, image-based abuse and technology facilitated abuse)
- 10.4 Such behaviours will never be tolerated or dismissed as banter, peer conflict or part of growing up.

11 Sexual Exploitation and Criminal Exploitation

- 11.1 Both sexual exploitation and criminal exploitation are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal or sexual activity. It may involve an exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. Sexual exploitation and criminal exploitation can affect both male and females and can include children and vulnerable adults who have been moved (commonly referred to as trafficking) for the purpose of exploitation
- 11.2 Sexual exploitation is a form of sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as

masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children and vulnerable adults in the production of sexual images, forcing children and vulnerable adults to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

- 11.3 Sexual exploitation can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge for example through others sharing videos or images of them on social media.
- 11.4 Sexual exploitation can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex.
- 11.5 Consent cannot be given even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them.
- 11.6 The abuse does not always involve physical contact and can happen online.
- 11.7 Some specific forms of criminal exploitation can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.
- 11.8 Children and vulnerable adults can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others.
- 11.9 As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.
- 11.10 It is important to note that the experience of females who are criminally exploited can be very different to that of males. The indicators may not be the same, however professionals should be aware that females are at risk of criminal exploitation too. It is also important to note that both males and females being criminally exploited may be at higher risk of sexual exploitation
- 11.11 A significant number of victims go missing from home, care and education. Noticeable signs of exploitation in a child can include aggression, anxiety, depression, change in appearance and becoming involved in gangs.
- 11.12 Other indicators of sexual exploitation can include;
 - 11.12.1 Children who have older boyfriends or girlfriends.
 - 11.12.2 Children who misuse drug and/or alcohol.
 - 11.12.3 Children who appear with unexplained gifts or new possessions.
- 11.13 If any employee in the course of their work discovers that an act of child exploitation appears to have been carried out on a child then the employee must report the incident following the normal safeguarding reporting process.
- 11.14 Modern slavery and the trafficking of children is child abuse. Modern slavery is mostly a hidden crime, and to get a true picture of its prevalence is challenging. It is an umbrella term and includes human trafficking.
- 11.15 Trafficking does not necessarily involve travel to another country or even long distance nationally. A child or vulnerable adult can be trafficked within their local area, especially for sexual exploitation and criminal exploitation (including county lines). Exploitation can also include forced labour, domestic servitude, or the removal of a person's organs.
- 11.16 Please refer to GEM's Child Labour and Remediation Policy and GEM's Modern Slavery and Remediation Policy for further information.

12 Domestic abuse

- 12.1 Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional.

12.2 Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

12.3 GEM Partnership will work with partner agencies and educational establishments to support young people affected by domestic abuse, including information sharing arrangements where appropriate and lawful

13 Serious violence

13.1 All staff should be aware of the indicators, which may signal children and vulnerable adults are at risk from, or are involved with, serious violent crime. This could include weapon carrying as well as weapon threats. These may include increased absence from their assignment, planned learning, a change in friendships or relationships with older individuals or groups, a significant decline in work or educational performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries as well as risks around travel to and from training/workplace settings. Unexplained gifts or new possessions could also indicate that children and vulnerable adults have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

14 Violence against Women and Girls

14.1 GEM Partnership recognises the impact of violence against women and girls and the importance of challenging harmful attitudes, misogyny, sexual harassment, coercive behaviour and gender-based abuse.

14.2 Staff should remain vigilant to indicators of harmful behaviours and report concerns using safeguarding procedures.

15 Extra-Familial Harm

15.1 Staff should understand that abuse, exploitation and neglect may occur outside the family home and can occur within peer groups, educational settings, online environments and local communities.

16 Children with Family Members in Prison

16.1 Staff should recognise that children with family members in prison may experience trauma, stigma, isolation, poor attendance, mental health difficulties and additional safeguarding vulnerabilities. Appropriate support and signposting should be provided where concerns arise

17 Staying Safe Online

17.1 Online safety forms part of GEM Partnership's safeguarding culture. Learners and workers may encounter safeguarding risks both online and offline.

17.2 Online risks can include:

17.2.1 Child criminal exploitation

17.2.2 Child sexual exploitation

17.2.3 Online grooming

17.2.4 Radicalisation

17.2.5 Cyberbullying

17.2.6 Sextortion

17.2.7 Deepfake imagery

17.2.8 Misinformation and disinformation

17.2.9 AI-enabled abuse

17.2.10 Online hate

17.3 Staff should recognise that safeguarding incidents can take place wholly online.

17.4 Staff should recognise indicators that learners and workers may be involved in cyber-dependent criminal offences including hacking, malware creation, denial-of-service attacks or

unauthorised access to systems. Concerns should be reported to the DSL who may consider referral to appropriate intervention services.

- 17.5 Staff should recognise that cybercrime, phishing, account compromise and AI-assisted cyber attacks may create safeguarding risks for learners and staff. Concerns should be reported immediately through safeguarding and information security procedures.
- 17.6 GEM Partnership recognises that Artificial Intelligence (AI) tools are increasingly used by learners, employers and staff. Whilst these technologies can support learning and productivity, they may also create safeguarding risks. Risks include:
 - 17.6.1 AI-generated misinformation and disinformation
 - 17.6.2 Deepfake images, video and audio
 - 17.6.3 AI-enabled bullying and harassment
 - 17.6.4 AI-generated sexualised imagery
 - 17.6.5 Grooming using AI-generated content
 - 17.6.6 Impersonation of staff, learners or employers
 - 17.6.7 Sharing personal information within AI platforms
 - 17.6.8 AI-assisted phishing and cybercrime
- 17.7 Staff must report any safeguarding concern involving AI-generated content using normal safeguarding processes. Learners should only use AI tools in line with organisational guidance and appropriate safeguards.
- 17.8 Technology is a significant component in many safeguarding and wellbeing issues and can include:
 - 17.8.1 AI-generated child sexual abuse material awareness
 - 17.8.2 financially motivated sexual extortion (FMSE/sextortion)
 - 17.8.3 online misogyny and misandry
 - 17.8.4 online sexual harassment
 - 17.8.5 group chat abuse

18 Mental health

- 18.1 All staff should be aware that mental health problems, which include self-harm, suicidal ideation and suicide risk can, in some cases, be an indicator that a child or vulnerable adult has suffered or is at risk of suffering abuse, neglect or exploitation.
- 18.2 Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem.
- 18.3 If staff have a mental health concern about a child or vulnerable adult that is also a safeguarding concern, immediate action should be taken and it reported as soon as possible.

19 Additional Learning Needs

- 19.1 All staff should be aware of and respond to the additional safeguarding vulnerabilities that some children and vulnerable adults may face, including those with special educational needs and/or disabilities (SEND), those who receive high needs funding, those who are known (or previously known) to children's social care, and those who face other barriers to their learning and wellbeing. This could include temporary barriers to learning caused by bereavement and/or a relationship breakdown.

20 Female Genital Mutilation (FGM)

- 20.1 FGM is illegal in the UK and is a form of child abuse, if any employee in the course of their work discovers that act of FGM appears to have been carried out on a girl under that age of 18 the employee must report the incident to the police whilst also following the normal safeguarding reporting process.
- 20.2 CPD on this subject is mandatory for all GEM Partnership employees. In addition, as part of the induction process staff are required to complete online training.

21 Safeguarding Structure and Responsibilities

- 21.1 GEM Partnership's designated safeguarding officers (DSO) responsible for Safeguarding are:
 - 21.1.1 Julie Hunter - HR Manager who is the Safeguarding Governance - 07714136807
 - 21.1.2 Kelly Lee - Training Director who is the Safeguarding Lead - 07834732088
 - 21.1.3 Annie Dorner - Training Compliance Manager who is the Safeguarding Officer - 07568429147
- 21.2 The DSO are qualified to Level 3 Safeguarding.
- 21.3 Kelly Lee is the Designated Safeguarding Lead (DSL) for GEM Partnership.
- 21.4 GEM Partnership has a team of trained Mental Health First Aiders, that meet on a regular basis to discuss good practice and share local and national support services. The team is headed by 2 designated safeguarding officers to provide support and correct signposting information to the team.
- 21.5 GEM Partnership takes the view that all staff and learners are required to take a shared responsibility for the protection and safety of any children, young people and vulnerable adults.
- 21.6 Some staff across the Company will have occasional contact with under 19's or vulnerable adults in the course of their work.

22 Control Measures/Procedures

- 22.1 All designated persons stated within this policy will be trained to ensure the needs of the Safeguarding Authority are met. All staff will receive appropriate safeguarding training and regular updates.
- 22.2 All members of staff are advised to minimise physical contact with learners except for reasons of health and safety, or where physical contact may be a necessary part of learning.
- 22.3 GEM Partnership reserves the right to deny employment to individuals where safe recruitment practice suggests they might pose a danger to the learning community.
- 22.4 GEM Partnership will monitor learners usage of IT through robust social media, Staying Safe Online and Cyber Bullying policies.
- 22.5 GEM Partnership reserves the right to suspend and exclude learners involved in incidents relating to other learner's safety and possible bullying and harassment.
- 22.6 GEM Partnership also reserves the right to suspend and/or dismiss staff members in accordance with its employment procedures, from employment or from undertaking a specific role with respect to the employment. This may apply if information was withheld about their criminal record at the point of employment or acquires a criminal record during employment.
- 22.7 All members of staff working closely with children or vulnerable adults have to be alert to possibilities of abuse and any concerns about the behaviour of any adult with respect to that child or vulnerable adult should be reported.
- 22.8 All members of staff working closely with children or vulnerable adults need to be aware that being absent from education or work for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, sexual and criminal exploitation - particularly county lines.
- 22.9 All members of staff working closely with children or vulnerable adults need to be aware that mental health problems can, in some cases, be an indicator that a child or vulnerable adult has suffered or is at risk of suffering abuse, neglect or exploitation.
- 22.10 All members of staff are aware of the processes for accessing Family Help where a child or young person and family would benefit from additional support before statutory intervention becomes necessary. Early identification and intervention are key principles of GEM Partnership's safeguarding arrangements.
- 22.11 DBS disclosures are obtained for all staff and volunteers working in 'regulated positions' (as defined by the Criminal Justice and Court Service Act 2000) with children, young people or vulnerable adults. The Company will evaluate information to determine individual's appropriateness to work in such an activity.

- 22.12 Where staff are not engaged in regulated positions but are involved in activities that may involve children or vulnerable adults, a risk management approach is taken to delivery of learning and teaching, and activities involving the wider public.
- 22.13 GEM Partnership will follow the locally agreed multi agency procedures for obtaining additional support and guidance.
- 22.14 This policy will be used in conjunction with GEM Partnerships Information, Security and Technology Policy, Staying Safer Online Policy, Cyber Bullying Policy, IT and Data Staff Handbook, Acceptable Use Policy for Remote Learning.
- 22.15 GEM Partnership has processes in place to check if learners, workers and staff are paid into their own bank account and if not, is this is investigated by the appropriate persons. Duplicate bank accounts are also flagged by the payroll software and passed over to investigate.

23 Partnership Working

- 23.1 Safeguarding work depends on effective partnership. To demonstrate effective compliance with the duty, specified authorities must demonstrate evidence of productive co-operation, in particular with local Safeguarding board, the police and local authorities and co-ordination through existing multi-agency forums.
- 23.2 The DSL and DSO should be clear what processes are in place, what support can be accessed and how to access this support. This information should be reviewed on a regular basis.
- 23.3 Channel is a multi-agency approach to safeguarding, supporting and protecting children, young people and vulnerable adults at risk of radicalisation, extremism or terrorist related activity. Channel referrals should therefore be prioritised by the local authority and other statutory partners in all of their work to safeguard vulnerable individuals. Channel should be considered alongside other early intervention measures such as work undertaken to support and divert young people from anti-social behaviours, gangs or drugs.
- 23.4 Awareness of Safeguarding and an understanding of the risks it is intended to address are both vital. Work on Safeguarding needs to be seen in this context. The purpose must be to protect children and young people from harm.

24 Procedures to be used when Harm/Abuse is Suspected

- 24.1 All members of staff working closely with children and/or vulnerable adults have to be alert to possibilities of abuse. Any concerns should be reported to a DSO who will decide what further action to take.
- 24.2 It is the duty of staff to inform only not to investigate – this is the role of the Police and Social Services.
- 24.3 If Staff, in the course of their work at the Company have a safeguarding issue brought to their notice, this must be treated as a priority over all work.
- 24.4 The DSO will follow the procedures as agreed by the local safeguarding body (see supporting information).
- 24.5 All personal data will be processed in accordance with requirements of the Data Protection Act 2018

25 How to make a Referral

- 25.1 Learners, workers and staff can make referrals direct through the Report a Concern form accessible through GEM Partnership App or the QR code on posters at GEM Partnerships client sites, offices and course venues.
- 25.2 The GEM Partnership Apps also have contact details for Mental Health First Aiders as well as welfare and wellbeing resources. This includes information and contact details for local services covering gambling, foodbanks, financial difficulties and debt as well as health issues. This enables learners, workers and staff to self-refer direct to local agencies if they feel more comfortable.
- 25.3 Referrals can be made to a DSO direct
- 25.4 If a learner is deemed to be at immediate risk the Police should be contacted immediately following which a safeguarding referral form can be sent to the Initial Response Team.

26 Procedures for Dealing with Allegations Against Staff, Workers and other Learners

- 26.1 The allegations should be reported immediately to the Designated Safeguarding Lead(DSL) or Designated Safeguarding Officer (DSO), who should;
 - 26.1.1 Obtain written details of the allegations from the person who received it.
 - 26.1.2 Record information about times, dates, locations and names of potential witnesses.
 - 26.1.3 Ensure the recorded information is signed and dated
 - 26.1.4 The written details should be countersigned and dated by the DSL/DSO.
 - 26.1.5 The DSL/DSO should inform the senior manager responsible for that area of the business.
- 26.2 In some circumstances GEM Partnership may need to act jointly with another organisation. The DSL/DSO should make an initial assessment of the allegation, consulting with the Education Child Protection Unit, Social Care, LADO (Local Authority Designated Officer) / Police as appropriate.
- 26.3 Where the allegation is considered to be either a potential criminal act or indicates that the child or vulnerable adult has suffered, is suffering or is likely to suffer significant harm, the matter should be reported immediately to the social care services.
- 26.4 Safeguarding enquiries by social care or the Police are not to be confused with internal, disciplinary enquiries by GEM Partnership. GEM Partnership may use the outcome of external agency enquiries as part of its own procedures.
- 26.5 GEM Partnership will assist the relevant agencies with their enquiries.
- 26.6 GEM Partnership shall hold in abeyance its own internal enquiries while the formal police or social care investigations proceed; to do otherwise may prejudice the investigation. Any internal enquiries shall conform to the existing staff disciplinary procedures.
- 26.7 'Settlement agreements' (sometimes referred to as compromise agreements), by which a person agrees to resign if the employer agrees not to pursue disciplinary action and both parties agree a form of words to be used in any future reference, should not be used, where there are allegations that indicate the person is a risk or poses a risk of harm to children or deemed not suitable to work with children. Such an agreement will not prevent a thorough police where that is appropriate.
- 26.8 If there is an investigation by an external agency, for example the police, the DSL/DSO should normally be involved in, and contribute to, the inter-agency strategy discussions. The DSL/DSO will ensure that GEM Partnership gives every assistance with the agencies enquires. Appropriate confidentiality will be maintained in connection with the enquiries, in the interest of the member of staff that he/she should consult with a representative, for example, a trade union.
- 26.9 The DSL/DSO will consult with the police or other investigating agency (e.g. Social Care), particularly in relation to timing and content of the information to be provided, and shall;
 - 26.9.1 Inform the child/vulnerable adult or parent/carer/independent advocate making the allegations that the investigation is taking place and what the likely process will involve.
 - 26.9.2 The DSL/DSO with lead responsibility shall keep written records of the action taken in connection with the allegation.
 - 26.9.3 Consideration should be given to supporting children (and adult students) who have witnessed sexual violence as witnessing such an event is likely to be traumatic and support may be required.
- 26.10 Any concerns or allegations which do not meet the harm threshold, referred to in this guidance as 'low-level' concerns, should still be reported and recorded and appropriate action taken to safeguard children.

27 Suspension of Staff

- 27.1 Suspension may be considered at any stage of the investigation. It is neutral, not a disciplinary act and shall be on full pay. Considerations should be given to alternatives: e.g. paid leave of absence; agreement to refrain from attending work; change of, or withdrawal from, specified duties.
- 27.2 Suspension should only occur for a good reason. For example:

- 27.2.1 Where a child/student/vulnerable adult is a risk
- 27.2.2 Where the allegations are potentially sufficiently serious to justify dismissal the grounds of gross misconduct.
- 27.2.3 Where necessary for the good and efficient conduct of the investigation.
- 27.3 Prior to making the decision to suspend, the DSL/DSO should interview the member of staff. This should occur with the approval of the appropriate agency. In particular, if the police are engaged in an investigation the Officer in charge of the case should be consulted.
- 27.4 During the interview, the member of staff should be given as much information as possible, in particular the reasons for any proposed suspension, provided that doing so would not interfere with the investigation into the allegation. The interview is not intended to establish the member of staff innocence or guilt, but to give for the member of staff the opportunity to make representations about possible suspension. The member of staff should be given the opportunity to consider any information given to him/her at the meeting and prepare a response, although that adjournment may be brief.
- 27.5 If the DLS/DSO considers that suspension is necessary, the member of staff shall be informed that he/she is suspended from duty. Written confirmation of the suspension, with reasons, shall be dispatched as soon as possible and ideally within one working day.

28 Allegations without Foundation

- 28.1 False allegations may be indicative of problems of abuse elsewhere. A record should be kept and consideration given to a referral to Social Care or other agencies in order that other agencies may act upon the information.
- 28.2 The DSL/DSO shall:
 - 28.2.1 Inform the member of staff against whom the allegation is made orally and in writing that no further disciplinary or child protection action will be taken. Consideration should be given to offering help and support to enable them to return to work, this will depend on the individuals' circumstances. HR or the LADO will usually offer advice but examples of support could be by a phased return to work, provision of a mentor or counselling/support.
 - 28.2.2 The DSL/DSO should also consider how the person's contact with the child or children who made the allegation can best be managed if they are still a learner.
 - 28.2.3 Inform the parents/carers/independent advocate of the alleged victim that the allegation has been made and of the outcome.
 - 28.2.4 Where the allegation was made by a learner other than the alleged victim, consideration to be given to informing the employee/learner and his/her parents/carer's if necessary.
 - 28.2.5 Prepare a report outlining the allegation and giving reasons for the conclusion that it had no foundation and confirming that the above action had been taken.
- 28.3 Whistle Blowing - Members of staff have the avenue to raise concerns relating to matters that are unlawful, against policy or amount to improper conduct. Concerns should be raised in the first instance to the appropriate line manager or if judged more appropriate directly to a Senior Manager. Please refer to GEM's whistle blowing policy for further information.

29 Records

- 29.1 Details of allegations following an investigation that are found to have been malicious or false should be removed from personnel records unless the individual gives their consent for retention of the information. However, for all other allegations, i.e. substantiated, unfounded and unsubstantiated it is important that the following information is kept on the file of the person accused:
 - 29.1.1 a clear and comprehensive summary of the allegation
 - 29.1.2 details of how the allegation was followed up and resolved
 - 29.1.3 a note of any action taken, decisions reached and the outcome i.e. substantiated, unfounded or unsubstantiated
 - 29.1.4 a copy provided to the person concerned, where agreed by local authority children's social care or the police, and

- 29.1.5 a declaration on whether the information will be referred to in any future reference.
- 29.2 If a member of staff is dismissed or resigns before disciplinary process is completed, he/she should be informed about GEM Partnership Ltd statutory duty to inform the Governing Bodies and/or Local Authorities.

30 CPD and Training

- 30.1 All new staff will complete online training on Safeguarding in FE and Training Sector as part of their induction process.
- 30.2 All new staff across the whole business are inducted to Safeguarding Staff Handbook and are aware of designated staff and reporting procedures as part of their induction.
- 30.3 CPD on Safeguarding will be completed on an annual basis by all staff and will include:
 - 30.3.1 KCSIE requirements
 - 30.3.2 Online safety
 - 30.3.3 AI and deepfake awareness
 - 30.3.4 Child-on-child abuse
 - 30.3.5 Prevent
 - 30.3.6 Mental health and wellbeing
 - 30.3.7 Violence Against Women and Girls (VAWG)
- 30.4 Updated Modern Slavery training is provided for all staff on a yearly basis, to ensure staff are aware of signs of modern slavery, human trafficking, physical, emotional and financial abuse.
- 30.5 The DSO will be qualified to Level 3 and will update their CPD on annual basis.
- 30.6 Safeguarding of learners and staff is implemented and discussed on a monthly basis as part of the review process.
- 30.7 All employees, associates and contractors involved in learner-facing activities are required to read and understand the safeguarding principles contained within Part One of Keeping Children Safe in Education 2026.

31 Training for Learners

- 31.1 All learners are inducted to GEM Training Handbook to Safeguarding, reporting procedures and who the Designated Safeguarding Officer are and contact details.
- 31.2 Assignment setting for self-learning for Safeguarding.
- 31.3 Embedding of hot topics and opportunities during learning to promote a deeper understanding of Safeguarding throughout the programme.
- 31.4 Safeguarding of learners is implemented and discussed as part of 360 reviews every 8 -10 weeks
- 31.5 Ensuring that learners, workers and staff know how to raise any safeguarding concerns including through the GEM Partnership App

32 Training for Employers

- 32.1 Policies and Procedures provided as part of the commitment statement.
- 32.2 Employers are signposted to eLearning covering Safeguarding and Prevent
- 32.3 Safeguarding Risk Assessment
- 32.4 Outlines specific requirements of pre-employment checking, training and accountability for all types of workers including new staff, governors, associates, volunteers and work experience who are either employed or engaged on assignment with GEM Partnership.

33 Supporting Documentation

- 33.1 GEM Partnership Staff Recruitment and Selection Policy
- 33.2 GEM Partnership Whistleblowing Policy
- 33.3 GEM Partnership Social Media, Staying Safe Online and Cyber Bullying Policy
- 33.4 GEM Partnership IT and Data Handbook
- 33.5 GEM Partnership Acceptable Use Policy for Remote Learning
- 33.6 GEM Partnership Remote Learning Policy

- 33.7 GEM Partnership Safeguarding Statement
- 33.8 Safeguarding Risk Assessment
- 33.9 GEM Partnership Modern Slavery and Remediation Policy
- 33.10 GEM Partnership Child Labour and Remediation Policy
- 33.11 GEM Partnership Ethical Trading Statement and Policy
- 33.12 GEM Partnership Human Rights Statement
- 33.13 GEM Partnership British Values and Standards Policy
- 33.14 GEM Partnership Prevent Policy
- 33.15 GEM Partnership Anti-Harassment and Bullying Policy
- 33.16 GEM Partnership Sexual Harassment Policy

34 Supporting Resources

- 34.1 [DfE advice for schools: teaching online safety in schools](#)
- 34.2 [UK Council for Internet Safety \(UKCIS\) guidance: Education for a connected world](#)
- 34.3 [UKCIS guidance: Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)
- 34.4 [The UKCIS external visitors' guidance will help schools and colleges to ensure the maximum impact of any online safety sessions delivered by external visitors](#)
- 34.5 [National Crime Agency's CEOP Education Programme: Protecting children and young people from online child sexual abuse through education](#)
- 34.6 [Public Health England40: Every Mind Matters](#)
- 34.7 National Crime Agency's CEOP Safety Centre aims to keep children and young people safe from online sexual abuse. Online sexual abuse can be reported on their website and a report made to one of its Child Protection Advisors - <https://www.ceop.police.uk/Safety-Centre/>
- 34.8 The NSPCC provides a helpline for professionals at 0808 800 5000 and help@nspcc.org.uk. The helpline provides expert advice and support for school and college staff and will be especially useful for the designated safeguarding lead (and their deputies).
- 34.9 Support from specialist sexual violence sector organisations such as Rape Crisis - <https://rapecrisis.org.uk/> or The Survivors Trust - <https://thesurvivorstrust.org/>
- 34.10 The Anti-Bullying Alliance - <https://anti-bullyingalliance.org.uk/> has developed guidance for schools about Sexual and sexist bullying.

35 Overarching responsibility of this policy

- 35.1 Maria Miller, Director – Maria.Miller@gempartnership.com