



CHILD PROTECTION AND SAFEGUARDING POLICY

Ember Learning Ltd

Document Reference:	EL-CPSP-001
Date Adopted:	1 September 2026
Status:	Adopted

1. POLICY STATEMENT

Ember Learning Ltd, is committed to safeguarding and promoting the welfare of all students and young people with whom it works. This commitment is unconditional and underpins every aspect of our organisation.

Ember Learning provides online small group teaching and mentoring services. Teaching sessions cover mathematics and English for school-aged children. Mentoring sessions cover personal development for individuals of all ages served by the Company. Our students are referred to us by commissioning bodies, which may be Local Authorities, Multi-Academy Trusts, private companies or individual schools ('Commissioners'). Where provision is arranged by a Local Authority, this is principally as a form of non-statutory alternative provision under Section 19 of the Education Act 1996 and/or the Children and Families Act 2014. Where a school or private alternative provision commissions directly, the school / AP acts as the responsible commissioning body. Sessions are delivered via an approved online platform by self-employed teachers and mentors. References in this Policy to 'the Service Agreement' mean EL-SA-001 (teaching) or EL-SA-002 (mentoring), whichever governs the Commissioner's engagement with the Provider.

We believe that:

The welfare of every child and adult at risk is paramount, regardless of age, ability, disability, gender, race, religion, sexual orientation, or background

All children and adults at risk, whatever their circumstances, have the right to be protected from harm

Every member of our organisation — including self-employed associates — shares responsibility for safeguarding and has a duty to act if they have concerns

Safe and effective safeguarding practice must be embedded in our culture, our recruitment, our training, and our operational delivery

This Policy is informed by and consistent with Keeping Children Safe in Education (DfE, 2026) ('KCSIE'), Working Together to Safeguard Children (HM Government, 2023), and all applicable

legislation. Although Ember Learning is not a registered school, we apply KCSIE principles as best practice because we deliver regulated activity with children.

2. SCOPE

2.1 This Policy applies to:

All Company directors and employees

All self-employed teachers and mentors engaged by Ember Learning, regardless of the frequency or nature of their engagement

Any volunteer or observer present during a session

2.2 Self-employed status does not reduce, remove, or limit any individual's safeguarding obligations. Any person working with students and mentees under this Policy must comply with it fully.

2.3 This Policy covers all sessions delivered via the approved session platform, all administrative and management activities, and any other activity in which Ember Learning staff or associates come into contact with children and adults at risk.

3. LEGAL AND REGULATORY FRAMEWORK

This Policy reflects the requirements of the following legislation and guidance:

Keeping Children Safe in Education (DfE, 2026) — applied as best practice

Working Together to Safeguard Children (HM Government, 2023)

The Children Act 1989 and the Children Act 2004

The Children and Families Act 2014

Section 19 of the Education Act 1996

The Safeguarding Vulnerable Groups Act 2006

The Protection of Freedoms Act 2012

The Care Act 2014 (adult safeguarding — applies where individuals served are aged 18 or over)

The Counter-Terrorism and Security Act 2015 (Prevent duty)

The Online Safety Act 2023

Information sharing: advice for practitioners (HM Government, 2024)

What to do if you're worried a child is being abused (DfE, 2015)

3A. KEY DEFINITIONS — ADULT AT RISK, MENTAL CAPACITY AND MAKING SAFEGUARDING PERSONAL

3A.1 ADULT AT RISK

Under Section 42 of the Care Act 2014, an adult at risk is a person aged 18 or over who: has needs for care and support (whether or not those needs are currently being met by the Company or anyone else); is experiencing, or is at risk of, abuse or neglect; and, as a result of those care and support needs, is unable to protect themselves against the abuse or neglect, or the risk of it. This is a three-part test, not an age threshold — not every Mentee aged 18 to 24 automatically meets this definition. Where a Mentee has an Education, Health and Care Plan (EHCP), is open to CAMHS, or has another identified care or support need, associates should treat this definition as likely to be engaged and should raise any doubt with the DSL rather than deciding the question themselves.

3A.2 MENTAL CAPACITY ACT 2005

Where a Mentee aged 18 or over may have difficulty understanding, retaining, weighing up, or communicating a decision (for example, a decision about whether information concerning them is shared, or how a safeguarding concern is handled), associates must apply the five principles of the Mental Capacity Act 2005:

- Assume the person has capacity unless it is established otherwise
- Take all practicable steps to help them make the decision themselves
- Do not treat an unwise decision as evidence of a lack of capacity
- Where a person lacks capacity, any decision made on their behalf must be in their best interests
- Any such decision must be the least restrictive option available

Associates are not expected to make capacity assessments themselves. Any concern that a Mentee's capacity may be in question must be reported to the DSL, who will determine next steps, including obtaining a formal capacity assessment where required.

3A.3 MAKING SAFEGUARDING PERSONAL

Adult safeguarding under the Care Act 2014 is led by the wishes of the adult concerned, in a way that differs from the position for a Student under 18. Where a Mentee aged 18 or over has capacity to make the relevant decision, their views on the outcome they want must be sought and given significant weight, including where they indicate they do not want a particular course of action taken, and this may affect how the DSL responds to a concern. This does not remove the Company's duty to act on a safeguarding concern, and associates must still report every concern in accordance with Section 8, but it does mean associates must not promise a Mentee that a particular outcome will follow from a disclosure. Clause 9.3 sets out how this principle applies to information sharing.

4. KEY PERSONNEL AND RESPONSIBILITIES

Role	Current Postholder	Responsibilities
Designated Safeguarding Lead (DSL)	Jack Bradley	Responsibility for safeguarding policy and practice. Point of contact for all safeguarding concerns. Makes decisions on referrals to statutory agencies. Maintains safeguarding records.

		Liaises with Commissioners' DSLs. Available during all session hours.
Deputy Designated Safeguarding Lead (Deputy DSL)	Mahesh De Zoysa	Acts as DSL in DSL's absence. Trained to the same level as DSL. Has full access to safeguarding records and session recordings. May make safeguarding referrals where the DSL is unavailable.
Company Director(s)	Jack Bradley and Mahesh De Zoysa	Responsibility for ensuring the organisation has an effective safeguarding policy, adequate DSL cover, and that all associates complete safer recruitment checks and mandatory training before working with students.

4.1 DSL AVAILABILITY. The DSL must be contactable during all hours in which sessions are scheduled. Where the DSL is unavailable (e.g. due to leave or illness), the Deputy DSL must be available to cover.

4.2 ALL ASSOCIATES. Every teacher and mentor shares responsibility for the welfare of students and mentees. Where an associate identifies or suspects a safeguarding concern, they must act immediately in accordance with Section 8 of this Policy.

5. TYPES OF ABUSE AND NEGLECT

All staff and associates must be aware of the four main categories of abuse, as defined in Working Together to Safeguard Children (2023):

PHYSICAL ABUSE may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates or induces illness.

EMOTIONAL ABUSE is the persistent emotional maltreatment of a child. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may feature age-inappropriate or developmentally inappropriate expectations being imposed on a child, or the serious bullying or witnessing of abuse of others.

SEXUAL ABUSE involves forcing or enticing a child to take part in sexual activities, not necessarily involving violence. This includes contact activities (such as rape, sexual assault, or penetration) and non-contact activities (such as creating or viewing sexual imagery involving children, or encouraging children to behave in sexually inappropriate ways). Online child sexual abuse is within scope.

NEGLECT is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. This includes failure to provide adequate food, clothing, shelter, supervision, medical care, or emotional support.

Associates should also be alert to indicators of:

Child sexual exploitation (CSE) and child criminal exploitation (CCE)
Domestic abuse (including where the child witnesses domestic abuse)
Female genital mutilation (FGM)
Forced marriage
Honour-based abuse
Radicalisation and extremism (Prevent)
County lines and gang exploitation
Children missing from education
Online harms, grooming, and exploitation
Mental health concerns that may indicate abuse or neglect

5B. CHILD-ON-CHILD ABUSE, HARASSMENT AND HARMFUL SEXUAL BEHAVIOUR

Abuse and harmful behaviour between students and mentees must never be dismissed as 'banter', normal peer conflict, or an inevitable part of growing up. This includes sexual harassment, sexual violence, and the making or sharing of nudes or semi-nudes, whether real, AI-generated, or digitally altered, all of which require a safeguarding response under this Policy regardless of whether it appears to have been consensual between those involved. Where such behaviour is identified or disclosed, the DSL will treat it as a safeguarding concern for both the student who has been harmed and the student displaying the behaviour, and will follow Section 9 of this Policy in responding to and documenting both.

5A. ADDITIONAL CATEGORIES OF ABUSE AND NEGLECT — MENTEES AGED 18 AND OVER

The Care Act 2014 recognises ten categories of abuse and neglect. Physical abuse, sexual abuse, neglect and domestic abuse are set out in Section 5 above and apply equally to Mentees aged 18 and over; emotional abuse in Section 5 corresponds to psychological abuse under the Care Act. In addition, associates working with Mentees aged 18 or over must be alert to the following categories, which are specific to adult safeguarding and are not otherwise covered above:

FINANCIAL OR MATERIAL ABUSE: the illegal or improper use of a person's money, property, or assets, including theft, fraud, exploitation, pressure in connection with wills or inheritance, or misuse of a person's benefits or bank account.

SELF-NEGLECT: a Mentee's inability or unwillingness to care for their own personal hygiene, health, home environment, or safety, to an extent that affects their wellbeing. Self-neglect has no direct equivalent in child safeguarding; any concern must still be reported under Section 8.

ORGANISATIONAL OR INSTITUTIONAL ABUSE: poor care practice, neglect, or abuse arising from the culture, systems, or routines of an organisation providing care or support to a Mentee, rather than from a single individual.

DISCRIMINATORY ABUSE: abuse, harassment, or hostility directed at a Mentee because of a protected characteristic such as disability, race, religion, gender, or sexual orientation.

MODERN SLAVERY: slavery, servitude, forced or compulsory labour, and human trafficking, which may affect a Mentee aged 18 or over in ways not captured by the child criminal exploitation indicators listed in Section 5.

6. RECOGNISING ABUSE — SIGNS AND INDICATORS

6.1 In an online teaching context, associates should be particularly alert to the following potential indicators during sessions:

Unexplained or recurrent absences from sessions without explanation (for Students or Mentees)

A Student or Mentee appearing distressed, withdrawn, or unusually emotional during or at the start of a session

Visible injuries visible on screen (unexplained bruising, burns, or marks)

Disclosures — direct or indirect — of abuse, neglect, exploitation, or harm (from Students or Mentees)

Significant changes in behaviour, mood, or engagement over time

A Student or Mentee appearing to be in an inappropriate location, in the presence of an adult causing concern, or in apparent distress in their home environment

Signs of radicalisation, extremist language, or vulnerability to exploitation

Inappropriate contact with the student observed via the platform's chat or messaging features

6.2 Teachers and mentors are not expected to be expert investigators. They are not required to determine whether abuse has occurred. Their role is to notice, record, and report. The DSL decides on next steps.

7. CONTEXTUAL SAFEGUARDING

7.1 Safeguarding concerns do not always arise from within the home. Teachers and mentors should be aware that harm to students and mentees can occur in peer relationships, online, in communities, and in other contexts. This is particularly relevant in an online delivery model where students may be visible in environments beyond school or home.

7.2 Any concern that appears to relate to the student's external context — including concerning language, apparent fear of others, or references to unsafe situations outside the home — should be reported to the DSL in the same way as any other concern.

8. REPORTING A SAFEGUARDING CONCERN — PROCEDURE FOR ASSOCIATES

8.1 ESCALATION FRAMEWORK. Teachers and mentors must use the following three-level framework when responding to concerns during or after a session:

LEVEL 1 — Concern noted, no immediate risk: log the concern via the Ember Learning safeguarding reporting function, accessible within the Platform. Teachers will be provided with clear guidance on how to access the reporting function as part of their onboarding and whenever the Platform interface changes. Concerns must be logged within one hour of the session ending, and the DSL should be notified at the next available opportunity

LEVEL 2 — Urgent concern requiring DSL input: contact the DSL (Jack Bradley) by telephone immediately. If DSL is unavailable, contact the Deputy DSL (Mahesh De Zoysa) immediately. DSL availability hours are 9:00am to 5:00pm, Monday to Friday, term time only. Do not wait until after the session. Outside DSL availability hours, where the concern does not involve immediate danger, contact the relevant Local Authority's Emergency Duty Team instead. Log the concern via the safeguarding reporting function within the Platform within one hour.

LEVEL 3 — Student in immediate danger: call 999 first, without waiting for DSL authorisation. Then contact the DSL immediately. DSL contact never takes precedence over emergency services

8.2 WHERE TO LOG. Safeguarding concerns must be logged via the Ember Learning safeguarding reporting function, accessible within the Platform. Teachers will be provided with clear guidance on how to access the reporting function as part of their onboarding and whenever the Platform interface changes. Concerns must be logged within one hour of the session ending, or immediately where the concern arises between sessions.

8.3 SINGLE-STUDENT PROTOCOL. If only one Student or Mentee attends a session (making it a 1:1 session), the teacher or mentor must notify the DSL by/at the end of the session. The session may proceed unless the DSL advises otherwise. If 1:1 sessions become a recurring pattern for a particular Student or Mentee, the teacher or mentor must notify the DSL so that this can be reviewed and appropriate mitigants confirmed. This clause should be read alongside clause 15.6

8.4 TEACHERS AND MENTORS — WHAT TO DO:

When logging any safeguarding concern, the report must include:

The Student's or Mentee's name and year group (where applicable)

The date and time of the observation or disclosure

A factual, objective account of what was seen, heard, or disclosed — using the student's exact words where a disclosure was made

Why the associate is concerned

Any contextual information that may be relevant

8.5 TEACHERS AND MENTORS — WHAT NOT TO DO:

Investigate or ask leading questions

Promise confidentiality to a student

Contact the student's family or carers about the concern without DSL authorisation

Discuss the concern with anyone other than the DSL or Deputy DSL

Delay reporting on the basis that a concern seems minor or uncertain

8.6 RECEIVING A DISCLOSURE. If a student makes a disclosure during a session, the associate should:

Remain calm and listen attentively

Not stop the student from speaking or tell them to stop

Use open, non-leading responses such as 'I hear you' or 'tell me more if you want to'

Not promise that what is said will be kept secret

Explain calmly that they will need to share what has been said with someone who can help

Complete the report to the DSL as soon as the session ends

9. THE DSL'S ROLE IN MANAGING CONCERNS

9.1 On receipt of a concern, the DSL will:

Assess the concern and determine appropriate next steps

Decide whether to make a referral to children's social care (for individuals under 18), adult social care (for individuals aged 18 or over under the Care Act 2014), the police, or any combination of these

Notify the referring Commissioner's designated safeguarding contact within 24 hours of a concern involving a referred student, unless there is a specific reason not to do so (for example, where doing so could put the student at increased risk). Where the Commissioner is a Local Authority, the DSL will notify the LA's designated safeguarding contact or virtual school officer. Where the Commissioner is a school, the DSL will notify the school's own Designated Safeguarding Lead directly. The applicable contact will be confirmed in the Commissioning Details schedule of the applicable Service Agreement at the point of referral.

Maintain a written record of all concerns, actions taken, and decisions made, and the reasons for those decisions

Review session recordings where relevant to the concern, in accordance with the Session Recording Policy (EL-SRP-002)

9.2 REFERRAL TO STATUTORY SERVICES. Where the DSL believes a Student may be at risk of harm, they will make a referral to the relevant Local Authority's Children's Social Care without delay. Where a Mentee aged 18 or over may be at risk of harm, the DSL will make a referral to Adult Social Care under the Care Act 2014 without delay. The DSL will not wait for certainty before making a referral if the threshold of reasonable suspicion is met.

9.3 INFORMATION SHARING. The DSL will share information about a student with statutory agencies in accordance with the principle that the welfare of the child overrides data protection

considerations. The DSL will be guided by Information sharing: advice for practitioners (HM Government, 2024). Where the individual concerned is a Mentee aged 18 or over, the DSL will additionally apply the Care Act 2014 principle of Making Safeguarding Personal set out in Clause 3A.3: information will generally only be shared with the Mentee's consent, unless the Mentee lacks capacity to make that decision, there is an overriding risk to the Mentee or to others, or another vital interest requires disclosure.

9.4 SAFEGUARDING RECORDS. The DSL maintains a confidential safeguarding record for each concern raised. Records are stored securely with restricted access. They are retained in accordance with the Company's data retention policy and are not included in general student files.

10. ALLEGATIONS AGAINST STAFF OR ASSOCIATES

10.1 Any allegation that a member of staff, teacher, or mentor has:

Behaved in a way that has harmed, or may have harmed, a child or adult at risk

Possibly committed a criminal offence against or related to a child or adult at risk

Behaved towards a child or adult at risk in a way that indicates they may pose a risk of harm to children or adults

Behaved or may have behaved in a way that indicates they may not be suitable to work with children or adults at risk (including behaviour outside of the workplace)

must be referred to the relevant Local Authority Designated Officer (LADO) without delay. Where the individual subject to the allegation works with adults aged 18 or over, the adult safeguarding referral route under the Care Act 2014 applies alongside or instead of the LADO procedure as appropriate.

10.2 The DSL is responsible for making LADO referrals. The Company Director must be informed immediately of any allegation against a member of staff or associate.

10.3 Where an allegation is made against the DSL, the referral must be made by the Company Director.

10.4 On receipt of an allegation, the Company will:

Refer to the LADO within one working day

Not investigate the matter internally before LADO referral

Follow all LADO guidance regarding the management of the individual's continued engagement pending investigation

Suspend or withdraw the individual from student-facing and mentee-facing activities where required by the LADO or where this is necessary to protect children's welfare

10.5 Whether or not an allegation results in a criminal prosecution or disciplinary action, a thorough review will be conducted to determine whether the individual should continue to work with children and/or adults at risk.

10.6 LADO REFERRAL — COMMISSIONING BODY CONTEXT. The relevant LADO for any referral is determined by the local authority area in which the student resides, not the area of the commissioning body. Ember Learning retains responsibility for making LADO referrals directly and will not delegate this to the commissioning body. Where the Commissioner is a school, the DSL will notify the school's own Designated Safeguarding Lead at the same time as making the LADO referral, unless doing so would place the student at increased risk or cause undue delay to the referral. Where the Commissioner is a Local Authority, the DSL will notify the LA's designated safeguarding contact in parallel. In all cases, the LADO referral will be made within one working day of the allegation being received, in accordance with Clause 10.4.

10.7 ROUTE OF REFERRAL FOR 18 AND OVER. Where an allegation described in Clause 10.1 concerns a Mentee aged 18 or over, the DSL will refer the matter to the Adult Social Care safeguarding team of the Local Authority in which the Mentee resides, as a safeguarding adults enquiry under Section 42 of the Care Act 2014. Unlike LADO, there is no single named role for this route: the relevant Local Authority's adult safeguarding team is determined by the Mentee's home address, in the same way as Clause 10.6 applies for LADO referrals.

10.8 IDENTIFYING THE CONTACT FOR 18 AND OVER. The relevant Local Authority Adult Social Care safeguarding contact will be identified and confirmed in the Commissioning Details schedule of the applicable Service Agreement at the point a Mentee aged 18 or over is referred to Ember Learning, in the same way as the Commissioner's safeguarding contact is confirmed under Clause 15.2.

10.9 TIMESCALE AND PROCESS FOR 18 AND OVER. The DSL will make the referral within one working day of the allegation being received, mirroring the LADO timescale in Clause 10.4. Pending the outcome, the Company will not investigate the matter internally before making the referral, will follow the Local Authority's guidance on managing the individual's continued engagement, and will suspend or withdraw the individual from Mentee-facing activity where required by the Local Authority or where necessary to protect the Mentee's welfare, applying Clauses 10.4 and 10.5 to this route.

10.10 DUAL OR UNCERTAIN CASES FOR 18 AND OVER. Where there is uncertainty about whether the LADO route (Clause 10.6) or the adult safeguarding route (this Clause 10.7) applies — for example, because the Mentee's age or care and support needs are unclear — the DSL will make both notifications rather than delaying referral to resolve the question, and will let the receiving statutory agencies determine lead responsibility.

11. PREVENT — RADICALISATION AND EXTREMISM

11.1 Ember Learning is committed to protecting students from radicalisation and extremist ideology. All associates must be alert to signs that a student may be at risk of radicalisation or being drawn into extremism.

11.2 Signs that may indicate radicalisation include: use of extremist language or glorification of violence; withdrawal from usual social activity; expression of intolerant views about others based on religion, ethnicity, or ideology; apparent contact with extremist groups; and possession or sharing of extremist materials.

11.3 Where an associate has a concern that a student may be at risk of radicalisation, they should report this to the DSL in the same way as any other safeguarding concern. The DSL will consider whether a referral to the Channel programme is appropriate.

12. SAFER RECRUITMENT

12.1 Ember Learning will not permit any individual to deliver sessions or access student personal data without completing the mandatory safer recruitment process set out in the Safer Recruitment Process document (EL-SRP-001).

12.2 This process requires, at minimum: an enhanced DBS check with both the Children's Barred List and Adults' Barred List checks; two satisfactory references (one involving work with children or adults at risk where applicable); identity verification; employment history review; and mandatory safeguarding training.

12.3 These requirements apply to all teachers and mentors without exception, regardless of self-employed status. The Company Director is responsible for ensuring the pre-start checklist is completed and signed off before any associate delivers a session.

13. TRAINING

13.1 DSL AND DEPUTY DSL. The DSL and Deputy DSL must complete DSL-level safeguarding training appropriate to their role. This training must be refreshed at least every two years. In addition, the DSL and Deputy DSL should update their knowledge and skills regularly through reading, briefings, and engagement with current safeguarding guidance. Both the DSL and Deputy DSL must read Keeping Children Safe in Education in full, annually.

13.2 TEACHERS AND MENTORS. All teachers and mentors must complete the Company's mandatory safeguarding awareness training before delivering any session. This training covers: recognising abuse and neglect; understanding the Company's reporting procedure; online safety in a teaching context; and Prevent awareness. Training must be renewed annually. All teachers and mentors must also read Keeping Children Safe in Education (Part One) annually, and must confirm in writing that they have done so before commencing sessions each year. All teachers and mentors must additionally complete training covering the Care Act 2014 adult safeguarding framework, including: the statutory definition of an adult at risk (Clause 3A.1); the categories of abuse and neglect specific to adult safeguarding (Clause 5A); the five principles of the Mental Capacity Act 2005 (Clause 3A.2); the Making Safeguarding Personal approach (Clause 3A.3); and the adult safeguarding referral route (Clause 10.7). Given that Ember Learning's mentee cohort spans ages 16 to 24, this training applies to all teachers and mentors as standard, and is not a supplementary module for a subset of associates.

13.3 RESPONSIBLE ADULT RECOMMENDATION. Ember Learning operates a small group session format as a structural safeguard: no student or mentee is ever alone with a teacher or mentor. The small group format (up to 3 students or mentees per session) is explicitly recognised by this Policy as a core organisational safeguard. In addition, Commissioners are responsible for communicating the following recommendation to parents and carers before a student's first session: for students under 12, a responsible adult should be present in the same room or immediately available during sessions, consistent with NSPCC guidance that younger

children should not be left unattended during online educational activity; for students aged 12 and over, a parent or carer should be reachable and in the locality during sessions, without a requirement to specify their exact location. Where no adult is present or reachable, the DSL should be notified in advance by the Commissioner. This is a recommendation, not an absolute requirement: Ember Learning does not hold responsibility for verifying or enforcing supervision arrangements in the student's home. Ember Learning is responsible for providing clear written guidance for Commissioners to share with parents and carers.

13.4 The DSL is responsible for keeping a record of all completed training. Teachers must provide evidence of completion before commencing sessions.

14. RECORD KEEPING AND INFORMATION GOVERNANCE

14.1 All safeguarding concerns, referrals, and actions are recorded in writing by the DSL. Records are:

Stored securely and separately from general student records

Accessible only to the DSL, Deputy DSL, and Company Director

Factual, dated, and signed

Retained in accordance with the Company's data retention schedule

14.2 Session recordings are retained for safeguarding purposes in accordance with the Session Recording Policy (EL-SRP-002).

14.3 Where a Student or Mentee moves on from Ember Learning, the DSL will consider whether any safeguarding information should be shared with the receiving organisation, in accordance with the principle that the child's welfare takes precedence.

14.4 All data held for safeguarding purposes is processed in accordance with the Data Processing Agreement (EL-DPA-001) and the Company's obligations under UK GDPR and the Data Protection Act 2018.

15. WORKING WITH COMMISSIONERS

15.1 Ember Learning works with two categories of commissioning body: Local Authorities (typically commissioning under Section 19 of the Education Act 1996) and schools (commissioning alternative provision directly). In both cases, the responsibility for safeguarding referred students and mentees is shared between Ember Learning and the commissioning body. The obligations in this section apply to all Commissioners, with the distinctions noted in Clause 15.2.

15.2 The Company's DSL will establish contact with the Commissioner's designated safeguarding contact at the point of referral and maintain that contact for the duration of the placement. Where the Commissioner is a Local Authority, the DSL will establish contact with the LA's designated safeguarding lead or virtual school officer. Where the Commissioner is a school, the DSL will establish contact with the school's own Designated Safeguarding Lead. In either case, this contact must be established before the student's first session and the relevant contact details confirmed in the Commissioning Details schedule of the applicable Service Agreement.

15.3 The DSL will notify the Commissioner's designated safeguarding contact within 24 hours of any safeguarding concern arising in relation to one of the Commissioner's referred students, unless doing so would place the student at increased risk. The route for notification will follow the arrangements confirmed in Clause 15.2 and the Commissioning Details schedule of the applicable Service Agreement.

15.3a Student non-attendance is treated as a potential safeguarding matter from the first unplanned absence. The Provider's platform generates automatic attendance alerts to the Commissioner's nominated safeguarding contact where a student fails to attend without prior notification. The full attendance notification and escalation procedure, including response timescales and the circumstances in which a statutory referral may be made, is set out in the applicable Service Agreement.

15.4 The Company will cooperate fully with any safeguarding investigation involving a referred student.

15.5 Where a Commissioner raises a safeguarding concern with Ember Learning within DSL availability hours (9:00am to 5:00pm, Monday to Friday, term time), the DSL will respond immediately and in accordance with Section 9 of this Policy. Concerns involving immediate danger to a Student, Mentee, or any other person must always be referred to emergency services (999) first, regardless of the time or day. Outside DSL availability hours, where a concern cannot wait until the next working day, the relevant Local Authority's Emergency Duty Team should be contacted.

15.6 1:1 SESSION PROTOCOL. Ember Learning' standard session format is small group (2–3 students). A session in which only one student is present constitutes a 1:1 session between a teacher or mentor and a child or adult at risk, which is an elevated-risk configuration requiring additional oversight. If a session becomes 1:1 for any reason (for example, because only one student logs in), the teacher or mentor must notify the DSL by/at the end of that session. The session may proceed; DSL sign-off is not required in advance. However, if 1:1 sessions become a recurring pattern for a particular Student or Mentee, the DSL must be informed so that the configuration can be reviewed and appropriate mitigants confirmed and documented. This clause should be read alongside Clause 8.3 (Single-Student Protocol).

15.7 STUDENT ONBOARDING. Commissioners are responsible for ensuring that parents and carers receive clear written information about session arrangements before or at the point of a student's first session. This information, provided by Ember Learning for Commissioners to share, must cover: the platform used and how students access it; the responsible adult recommendation (Clause 13.3); what to do if a concern arises during a session and what students are expected to bring and how to prepare. Where practicable, a parent or carer should be available at the time of the student's induction session so they can understand platform requirements and the supervision recommendation. Ember Learning is responsible for producing and keeping current the written guidance for Commissioners to share; Commissioners are responsible for ensuring it reaches parents and carers before referral.

16. WHISTLEBLOWING

16.1 Ember Learning supports a culture in which concerns about safeguarding practice — including the conduct of the DSL, Company directors, or any associate — can be raised safely and without fear of retaliation.

16.2 Any person who has concerns about safeguarding practice within the Company should raise them first with the DSL (or, where the concern involves the DSL, with the Company Director).

16.3 If the concern relates to the conduct of the Company Director, or if concerns raised internally have not been addressed, the individual may report to:

The NSPCC Whistleblowing Advice Line: 0800 028 0285

The relevant Local Authority's LADO

Ofsted (where the concern involves regulated activity with children)

16.4 The Company will not penalise or disadvantage any person who raises a safeguarding concern in good faith.

17. LINKED POLICIES AND DOCUMENTS

This Policy should be read alongside the following Ember Learning documents:

Online Safety Policy (EL-OSP-001)

Session Recording Policy (EL-SRP-002)

Safer Recruitment Process (EL-SRP-001)

Teacher and Mentor Agreement (EL-TMA-SE-003A or EL-TMA-E-003B) — including Schedule 2 (Confidentiality and Data Handling Undertaking)

Data Processing Agreement (EL-DPA-001)

Service Agreement (EL-SA-001 or EL-SA-002)

Complaints Procedure (EL-CP-001)

17A. TEACHER / MENTOR SUPERVISION AND OVERSIGHT

17A.1 PURPOSE AND APPROACH

Ember Learning operates an active teacher and mentor oversight framework with two complementary components: scheduled session recording reviews and regular pastoral meetings. This framework is designed to maintain safeguarding standards, support teacher and mentor welfare, and provide an ongoing layer of quality assurance that operates independently of any reactive concern or complaint.

Because all sessions are recorded automatically via the approved platform, Ember Learning has continuous access to a full archive of session activity. This means that oversight is not dependent on real-time observation and can be conducted in a structured, documented, and proportionate way.

17A.2 SESSION RECORDING SPOT-CHECKS

The DSL or Deputy DSL will conduct a minimum of one scheduled spot-check of a session recording per active teacher or mentor per calendar month. Each spot-check will cover no less than ten minutes of the recording and will be conducted by the DSL or Deputy DSL. Sessions delivered by the DSL themselves shall be reviewed by the Deputy DSL, and vice versa, to ensure no individual has sole oversight of their own sessions.

Following each spot-check, the reviewing DSL or Deputy DSL will make a brief log entry recording: the date of review; the teacher's name; the session reviewed (by date and reference); and the outcome (no concerns noted, or concern identified and action taken). This log will be maintained by the DSL and will be available to commissioning Local Authorities on request.

The session reviewed may be selected at the discretion of the DSL. Spot-checks are in addition to — and do not replace — the full review of recordings that will be undertaken where a safeguarding concern has been raised under Section 9 of this Policy.

Teachers and Mentors are informed at induction that scheduled spot-checks of session recordings take place as a routine part of the Company's safeguarding and quality oversight framework. This is not a covert process.

17A.3 MONTHLY TEACHER AND MENTOR MEETINGS

The DSL or Deputy DSL will facilitate meetings with all active teachers and mentors at least once per calendar month, conducted via video call. These meetings serve a dual purpose: they provide a regular pastoral check-in for teachers, and they function as a safeguarding supervision forum in which teachers can raise concerns, share observations about student welfare, and receive updates on safeguarding practice or guidance.

Each monthly meeting will include, as a standing agenda item, an opportunity for teachers and mentors to raise any concern — however minor or uncertain — about the welfare or behaviour of any student. Any concern raised during a meeting will be recorded by the DSL and managed in accordance with Section 9 of this Policy. Where a concern is urgent, teachers must not wait for the next scheduled meeting but must follow the immediate reporting procedure in Section 9.

These meetings also count toward the Company's ongoing safeguarding training obligations under Section 13 of this Policy, as they constitute regular safeguarding updates for the teacher workforce.

A brief record of each meeting will be kept by the DSL, noting the date, attendees, any concerns raised, and any safeguarding updates communicated. This record will be retained alongside the spot-check log as part of the Company's safeguarding documentation.

17A.4 RESPONSIBILITY

The DSL holds overall responsibility for ensuring that spot-checks and monthly meetings are completed and recorded. In the DSL's absence, the Deputy DSL assumes this responsibility. Where neither the DSL nor Deputy DSL is available in a given month, the oversight activity must be rescheduled and completed at the earliest opportunity, with a note made in the log explaining the delay.

18. POLICY REVIEW

This Policy will be reviewed annually and following any significant safeguarding incident, change in legislation, or updated statutory guidance. The review date and version will be updated below.

Policy Owner:	Jack Bradley, Director & Designated Safeguarding Lead
Date Adopted:	1 September 2026
Next Review Due:	1 September 2027 (or earlier if a trigger event occurs)
Approved by:	Jack Bradley, Director, 1 September 2026