

SAFEGUARDING AND  
CHILD PROTECTION POLICY

*EnjoyEducation*

## Contents

- Enjoy Education Safeguarding and Child Protection Policy 2026
- Key Contact Personnel at Enjoy Education
- Enjoy Education's Ethos and the Purpose of this Policy
- Definition of Safeguarding
- Key Responsibilities
- Designated Safeguarding Lead (DSL)
- Enjoy Education Safeguarding Committee
- Other Enjoy Education Members of Staff
- Tutors
- Context
- Related Safeguarding Policies
- Recognition and Types of Abuse and Neglect
- Disclosures
- Reporting Procedures, Record Keeping, and Making Referrals
- Early Help
- Multi-agency Working
- Confidentiality and Information Sharing
- Safer Recruitment Procedures
- Disclosure and Barring Service (DBS) Checks
- Staff Induction, Awareness, and Training
- Code of Conduct for Staff and Tutors
- Physical Contact and Care
- Allegations Against Members of Staff and Tutors
- Whistleblowing
- Points of Contact
- Appendix 1: Definitions and Indicators

### **Enjoy Education Safeguarding and Child Protection Policy 2026**

This policy is a core document forming part of the induction for all staff and tutors. All members of staff and tutors must have access to this policy, available on Enjoy Education's website and in hard copy at the Enjoy Education office.

**Date Written:** June 2026

**Date of Next Review:** September 2026

This policy will be reviewed at least annually and/or following any updates to national and local guidance and procedures.

### **Key Contact Personnel at Enjoy Education**

Our Designated Safeguarding Lead is Elizabeth Liffen, Office Manager, supported by our safeguarding committee. Please contact them at [safeguarding@enjoyeducation.co.uk](mailto:safeguarding@enjoyeducation.co.uk)

### **Enjoy Education's Ethos and the Purpose of this Policy**

Enjoy Education is a community of learners. All those directly connected to students (staff, tutors, parents, families, guardians, and peers) play a crucial role in making students feel safe and secure. Enjoy Education is committed to fostering an environment that ensures children are safe and feel safe.

This policy outlines how Enjoy Education meets its statutory duty under Chapter Two of Working Together to Safeguard Children 2023 to safeguard and promote the welfare of children, helping them achieve good outcomes. This is achieved by ensuring staff and tutors have the skills and knowledge to recognize when children are at risk and how to obtain help when needed.

### **Core Safeguarding Principles:**

- We are an integral part of the wider safeguarding system for children (i.e., those up to the age of 18).
- All children, regardless of age, gender, ability, culture, race, language, religion, or sexuality, have equal rights to protection.
- It is everyone's responsibility to safeguard and promote the welfare of children.
- The wellbeing and welfare of the child must be at the centre of our work.
- We recognise the importance of considering wider environmental factors in a child's life that may pose a threat to their safety and/or welfare.
- All children have a right to be heard and to have their feelings considered.
- All our staff and tutors understand safe professional practice and adhere to our safeguarding policies.

### **Definition of Safeguarding**

According to statutory guidance, safeguarding and promoting the welfare of children are defined as:

- Protecting children from maltreatment;
- Preventing impairment of children's health or development;
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- Taking action to enable all children to have the best outcomes.

The term 'children' includes everyone under the age of 18. Additional barriers exist when recognizing abuse and neglect in children with Special Education Needs and Disabilities (SEND). Children with SEND may have difficulties in understanding and recognizing abuse and communicating this effectively. Staff and tutors should be extra vigilant when working with students with SEND and avoid making assumptions that do not take indicators of abuse seriously. Any concerns should be reported to the DSL.

**Contextual Safeguarding:** As young people grow and develop, they are influenced by a range of environments and people outside of their family. They may encounter risk in school or college, in the local community, in their peer groups, or online. Contextual safeguarding looks at how to best understand these risks, engage with children, and help keep them safe. All staff and tutors, especially the DSL and deputy DSLs, should consider the context in which safeguarding incidents and behaviour occur and how they can be associated with factors outside the tutoring environment.

### **Key Responsibilities**

Enjoy Education has a Designated Safeguarding Lead (DSL). This individual leads in ensuring the company has an effective policy interlinking with other related policies, that agreed procedures are in place and followed, and that the policies are reviewed at least annually and when required. The CEO of Enjoy Education ensures that the DSL is properly supported in their role.

The Enjoy Education Safeguarding Committee consists of the DSL and three further experienced staff members.

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

The DSL and safeguarding committee hold the responsibility for safeguarding and child protection within the company and are available during office hours for staff and tutors to discuss safeguarding concerns. The DSL will undergo appropriate and specific training to provide them with the knowledge and skills required for their role. The DSL's training will be updated formally every two years, with knowledge and skills updated regularly and at least annually.

#### **The DSL's Responsibilities:**

- Read and understand Keeping Children Safe in Education 2025.
- Act as the central contact point for all staff and tutors to discuss any safeguarding concerns.
- Maintain a confidential recording system for safeguarding and child protection concerns.
- Coordinate safeguarding action for individual children.
- Ensure locally established referral procedures are followed as necessary.
- Liaise with and manage referrals to relevant agencies such as the Multi-Agency Safeguarding Hub (MASH), the Local Authority Designated Officer (LADO), the Police, and the Disclosure and Barring Service (DBS).
- Ensure the company's safeguarding and child protection policies are up to date and consistent with local policies.
- Ensure safer recruitment practice is followed when recruiting new members of staff and tutors.
- Ensure procedures are in place to deal with allegations made against tutors or staff.
- Ensure all staff and tutors have access to safeguarding training and updates in line with Keeping Children Safe in Education 2025.
- Ensure regular reporting on safeguarding activity and systems in the company to the CEO. The CEO will not receive details of individual pupil situations or identifying features of families as part of their oversight responsibility.

### **Enjoy Education Safeguarding Committee**

The members of the safeguarding committee have the responsibility to:

- Be aware of key points of Child Protection procedures outlined in Keeping Children Safe in Education 2025.
- Be prepared to identify children who may benefit from early help.
- Understand the early help process and their role in it.
- Understand Enjoy Education's safeguarding policies and systems.
- Undertake appropriate training, which is regularly updated.
- Be aware of the process of making referrals to children's social care and statutory assessment under the Children Act 1989. Refer to statutory guidance What to do if you're Worried a Child is Being Abused (2015) if in need of guidance.
- Know what to do if a child tells them that he or she is being abused or neglected.
- Know how to maintain an appropriate level of confidentiality.
- Be aware of the indicators of abuse and neglect to identify cases of children who may need help or protection.
- Refer to London's thresholds and eligibility criteria to help make decisions on the child's level of need and the appropriate service to refer to. Committee members will consult with the DSL for advice and discuss the case before making referrals.
- Review all safeguarding policies annually and maintain oversight of all child protection procedures in the business.
- Remain updated on safeguarding and child protection matters in the news (via ebulletins).

### **Other Enjoy Education Members of Staff**

Outside of the Safeguarding Committee, Enjoy Education staff have the responsibility to:

- Be aware of key points of Child Protection procedures outlined in Keeping Children Safe in Education 2025.
- Be prepared to identify children who may benefit from early help.

- Understand Enjoy Education’s safeguarding policies and systems.
- Undertake regular and appropriate training, which is regularly updated.
- Know what to do if a child tells them that he or she is being abused or neglected.
- Know how to maintain an appropriate level of confidentiality.
- Be aware of the indicators of abuse and neglect to identify cases of children who may need help or protection.
- Ensure a child has at least two emergency contacts saved to their file. Parents will be asked to update contact details, especially their mobile number. Concerns about poor attendance or not receiving suitable education should be reported to the DSL.

### **Tutors**

All tutors have a responsibility to:

- Be aware of key points of Child Protection procedures outlined in Keeping Children Safe in Education 2025.
- Understand Enjoy Education’s safeguarding policies and systems.
- Undertake regular and appropriate training, which is regularly updated.
- Be prepared to raise concerns over a child’s welfare with an Enjoy Education team member.
- Know what to do if a child tells them that he or she is being abused or neglected.
- Know how to maintain an appropriate level of confidentiality.
- Be aware of the indicators of abuse and neglect to identify cases of children who may need help or protection.

### **Context**

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related guidance, including:

- Keeping Children Safe in Education (Department for Education)
- Working Together to Safeguard Children (2023 Department for Education)
- Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents, and carers (2018)
- Disqualification under the Childcare Act (2006)

Enjoy Education acknowledges that its safeguarding and child protection procedures relate to a range of specific safeguarding issues, including but not limited to:

- Bullying (including cyberbullying)
- Children with family members in prison
- Children Missing Education (CME)
- Child missing from home or care
- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation (County Lines)
- Domestic abuse
- Drugs and alcohol misuse
- Fabricated or induced illness
- Faith abuse
- Female Genital Mutilation (FGM)
- Forced marriage
- Gangs and youth violence
- Gender-based abuse and violence against women and girls
- Hate
- Homelessness
- Honour-based abuse
- Human trafficking and modern slavery
- Mental health

- Missing children and adults
- Online safety
- Child-on-child abuse
- Preventing radicalisation and extremism
- Private fostering
- Relationship abuse
- Sexual Violence and Sexual Harassment
- Upskirting
- Youth-produced sexual imagery or “Sexting”

See Appendix 1 for definitions of some of these safeguarding issues. See Annex A within Keeping Children Safe in Education 2025 for additional information on abuse and neglect within these areas and what to look out for.

### **Related Safeguarding Policies**

This policy is part of Enjoy Education’s integrated safeguarding portfolio and should be read in conjunction with:

- Keeping Children Safe in Education 2025
- Enjoy Education’s Staff and Tutor Code of Conduct
- Safer Recruitment
- Reporting Procedures
- Data Protection and Information Sharing

### **Recognition and Types of Abuse and Neglect**

All staff and tutors should be aware of the definitions and indicators of abuse and neglect. There are four categories of abuse:

- Physical abuse
- Sexual abuse
- Emotional abuse
- Neglect

Staff and tutors have a responsibility to identify children suffering from abuse or neglect and ensure any concerns about a child’s welfare are reported to the DSL. Refer to Appendix 1 for definitions and specific indicators of significant harm, including the four types of abuse.

Warning signs and symptoms of child abuse and neglect can vary from child to child. Children develop and mature at different rates, so what may be concerning behaviour for a younger child might be normal for an older child. Parental behaviours may also indicate child abuse or neglect, so staff and tutors should be alert to parent-child interactions or concerning parental behaviours.

By understanding warning signs, we can respond to problems early and provide the right support and services for the child and their family. It is important to recognize that a warning sign doesn’t automatically mean a child is being abused.

### **Disclosures**

If a pupil discloses to a member of staff or tutor that they are being abused, the member of staff or tutor should:

- Listen without displaying shock or disbelief and accept what the child is saying.
- Allow the child to talk freely.
- Reassure the child but not make promises that cannot be kept or promise confidentiality as a referral may need to be made to the child’s local authority.
- Reassure the child that what has happened is not their fault and that they were right to tell someone.
- Not ask direct questions but allow the child to tell their story.
- Not criticize the alleged perpetrator.
- Explain what will happen next and who has to be told.

- Make a formal record and pass it to the DSL.

## **Reporting Procedures, Record Keeping, and Making Referrals**

### **Reporting**

Staff and tutors working with children should maintain an attitude of ‘it could happen here’ where safeguarding is concerned. When concerned about a child’s welfare, staff and tutors should always act in the child’s best interests.

If staff or tutors have concerns about a child’s welfare, they should act on them immediately. See section 11 for a flow chart on the process for staff when they have concerns about a child.

In the absence of the DSL to discuss an immediate and urgent concern, staff and tutors can seek advice from the safeguarding committee. They may also seek advice from the NSPCC or other advisory services. If anyone other than the DSL makes a referral to external services, they should inform the DSL as soon as possible.

If staff or tutors have a concern about a child outside of office hours, they can contact social services directly or the police if a crime has been committed and/or the child is at immediate risk.

If a staff member or tutor senses that a child is in immediate danger or at risk of harm, they should call the police and make an immediate referral to the child’s local child protection service. If the child is not in immediate danger, they should follow safeguarding policies and procedures, which may involve contacting the child’s local child protection services.

Where a pupil makes a disclosure of FGM or where there are indicators that FGM has/is about to take place, Enjoy Education will follow the mandatory reporting rules and make appropriate referrals to the police as set out in the statutory guidance.

Staff members and tutors have a duty to report disclosures on FGM about a female under 18 personally to the police. Should staff have concerns around FGM, including any disclosure made by a pupil, they should discuss these with the DSL, who will support them with action taken, particularly in reporting it to the police.

Where there are concerns that a young person might be considering extremist ideologies and/or may be radicalized or at risk due to their parent’s radicalization, this should be reported to the DSL, who will follow the PREVENT duty requirements. If a DSL has extremism-related concerns, they can call the Counter-Extremism Helpline (020 73407264). Further information is available on the Government’s Educate Against Hate website.

If a staff member or tutor suspects that a child may be privately fostered, they should notify the DSL. The DSL should then notify the local authority to check the arrangement is suitable and safe for the child.

If there are concerns that a child has poor attendance at school or is not receiving suitable fulltime education in either a home or school setting, these concerns should be made known to the DSL or safeguarding committee. The DSL and deputy DSLs will follow the local authority guidance of the area where the child lives and, if necessary, report the situation directly to them. See Appendix 1 for a definition of Children Missing Education (CME).

If staff or tutors become aware of Child-on-Child abuse or incidences of sharing nudes and semi nudes, they should immediately take their concerns to the DSL or deputy DSLs.

When an allegation is made by a student against another student, the safeguarding committee should consider if the issues raised indicate that the child and/or alleged perpetrator may have emerging needs, serious needs, or child protection concerns and follow the necessary referral process.

In cases of allegations of sharing nudes or semi nudes or sexual harassment, the DSL will hold an initial review meeting to determine the best course of action, referring to the UKCCIS 2016 guidance on sharing nudes or semi nudes and the DfE 2018 guidance on sexual harassment between children in schools and colleges.

### **Record Keeping**

All safeguarding concerns, discussions, and decisions (and justifications for those decisions) will be recorded in writing. If members of staff are in doubt about recording requirements, they should discuss their concerns with the DSL.

Staff and tutors will record any welfare concern about a child on the Enjoy Education incident and concern form (with a body map if injuries have been observed) and pass them without delay to the DSL, preferably by email. If this is not possible, they should bring it into the office in person. Records will be completed as soon

as possible after the incident/event using the child's words and signed and dated by the member of staff or tutor. If there is an immediate concern, the member of staff or tutor should consult with a DSL as this needs to take priority.

Any verbal conversation (either with other members of staff/tutors or with the child concerned) should be promptly recorded in writing using the incident and concern form.

Incident and concern forms should be emailed to the DSL. If this is not possible, they should be brought into Enjoy Education's office in person and handed to the DSL.

Incident/Welfare concern forms can be accessed via Google Drive, the tutor portal, or (for staff) the staff intranet. They can also be found in the Enjoy Education office.

Safeguarding records are kept for individual children and are maintained separately from all other records relating to the child. Safeguarding records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL. Safeguarding records are shared with staff and tutors on a 'need to know' basis only.

The CEO will be kept informed of any significant issues by the DSL.

On occasion, staff members or tutors may pass information about a child to the DSL but remain anxious about subsequent action taken. Staff and tutors should feel able to check the progress of a case with the DSL to reassure themselves that the child is safe and their welfare is being considered.

If following this process the staff member or tutor remains concerned, it is their responsibility to follow the company's escalation process.

### **Early Help**

Providing early help is more effective in promoting the welfare of children than reacting later. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. Early help can also prevent further problems from arising.

Enjoy Education staff and tutors will endeavour to identify children who need extra help at an early stage and provide help and support to prevent concerns from escalating.

Effective early help relies upon tutors, staff, and local partnerships working together to:

- Identify children and families who would benefit from early help.
- Undertake an assessment of the need for early help using the London Threshold Document.
- Provide targeted early help services to address the assessed needs of a child and their family, focusing on improving outcomes for the child.

Staff and tutors should be particularly alert to the potential need for early help for a child who:

- Is disabled and has specific additional needs.
- Has special educational needs.
- Is a young carer.
- Is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organized crime groups.
- Is frequently missing/goes missing from care or from home.
- Is at risk of modern slavery, trafficking, or exploitation.
- Is at risk of being radicalized or exploited.
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues, and domestic abuse.
- Is misusing drugs or alcohol themselves.
- Has returned home to their family from care.
- Is a privately fostered child.

If the child requires an early help service, Enjoy Education will make a referral to the Early Help service of the child's local authority. Staff will consult with parents before making any referral to discuss the matter and gain consent to refer the child.

### **Multi-agency Working**

Enjoy Education recognizes and is committed to its responsibility to work with other professionals and agencies in line with statutory guidance outlined in Working Together to Safeguard Children (2023).

Education providers are not the investigating agency when there are child protection concerns. However, Enjoy Education will contribute to the investigation and assessment processes as required. Enjoy Education recognizes the importance of multi-agency working and will support attendance at relevant safeguarding meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings, or other early help multi-agency meetings.

The DSL and Safeguarding Committee will work to establish strong and cooperative relationships with relevant professionals in other agencies.

### **Confidentiality and Information Sharing**

Enjoy Education recognises that all matters relating to child protection are confidential. The DSL will only disclose information about a pupil to other members of staff on a 'need to know' basis.

All members of staff must be aware that whilst they have duties to keep any information confidential, they also have a professional responsibility to share information with other agencies to safeguard children.

Fears about sharing information must not stand in the way of the need to protect a child. This includes allowing practitioners to share information without consent if it is for keeping children safe.

All staff and tutors must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or well-being.

Staff and tutors should refer to the 'seven golden rules to sharing information' of the DfE Guidance on Information Sharing (July 2018) for guidance.

Whilst all staff and tutors should wherever possible seek consent and be open and honest with the individual from the outset as to why, what, how, and with whom their information will be shared, there may be circumstances where it is not appropriate to seek consent. This could be because the individual cannot give consent, it is not reasonable to obtain consent, or gaining consent would put a child's safety or well-being at risk.

Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. Early information sharing is vital for effective identification, assessment, and allocation of appropriate service provision.

### **Safer Recruitment Procedures**

Enjoy Education is committed to ensuring that all steps are taken to ensure tutors and staff are safe to work with children. We are committed to:

- Safeguarding and protecting all children by implementing robust safer recruitment practices.
- Identifying and rejecting applicants who are unsuitable to work with children.
- Responding to concerns about the suitability of applicants during the recruitment process.
- Responding to concerns about the suitability of tutors and staff members once they have begun their role.
- Ensuring all new staff and tutors have access to an induction which includes training in core safeguarding procedures.

The Safeguarding Committee is responsible for ensuring that Enjoy Education follows safe recruitment processes. All staff and tutors are advised to disclose any reason that may affect their suitability to work with children, including convictions, cautions, court orders, reprimands, and warnings.

Members of staff or tutors working with children under eight years old must inform Enjoy Education that they are not disqualified from working according to the Disqualification under the Childcare Act (2006). If there are any changes to their status, they must inform Enjoy Education. See the statutory guidance for disqualification criteria.

If someone who has applied to tutor through Enjoy Education is barred from working with children, Enjoy Education will notify the police.

If an applicant has not been barred from working with children but the checks have raised concerns (e.g., a criminal record), Enjoy Education's recruitment team will carry out a risk assessment to ascertain whether the applicant is suitable to work with children.

Enjoy Education's recruitment team will only share information about an applicant's criminal record with those who need to know. The applicant will be told who in the organization knows about their record.

### **Disclosure and Barring Service (DBS) Checks**

All new tutors and staff are required to undergo Enhanced DBS checks, even if they will not be directly working with children under 18. If checks have been carried out prior to joining Enjoy Education, the tutor or staff member must show their certificate to a member of the recruitment team. The check must be no more than one year old and must be Enhanced.

If they do not have an in-date Enhanced DBS certificate, tutors and staff must provide Enjoy Education with the necessary documentation to process an Enhanced DBS check and comply with all relevant steps promptly. By signing up to tutor through Enjoy Education, tutors agree to cover the cost of their Enhanced DBS check.

As of 1st April 2021, repeat Enhanced DBS checks must be carried out every year. This means we require all tutors and staff to subscribe to the government update service or process a new Enhanced check each year. Tutors agree to cover the cost of the government update service subscription and/or the yearly renewal of their Enhanced DBS check by signing up to tutor through Enjoy Education.

Tutors who only tutor online are still required to provide Enjoy Education with an Enhanced DBS certificate.

Enjoy Education must see the original Enhanced DBS certificate to confirm that an applicant has undergone the appropriate checks.

Failure to renew or obtain a DBS will prevent a tutor from starting or continuing tuition placements.

Enjoy Education has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed or poses a risk of harm to a child or if there is reason to believe the member of staff or tutor has committed one of a number of listed offenses and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff or tutor, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO.

The DSL will consult government guidance on DBS referrals when deciding whether to refer.

### **Staff Induction, Awareness, and Training**

All members of staff and tutors have been provided with this policy and a copy of Part One and Annex A of Keeping Children Safe in Education 2025, which covers safeguarding information for all staff and tutors. The Safeguarding Committee will read the entire document.

The DSL will ensure that all new staff (including temporary staff) are aware of Enjoy Education's internal safeguarding processes. New staff and tutors will be issued this safeguarding policy during their induction.

All staff members and billing tutors will have access to online safeguarding training to ensure they are aware of a range of safeguarding issues. The safeguarding committee will maintain an up-to-date register of who has been trained. Refresher training will be completed annually.

All staff members receive regular safeguarding and child protection updates at least annually.

All staff members and tutors will be made aware of Enjoy Education's expectations regarding safe and professional practice via this policy.

The DSL will provide an annual report to the CEO detailing safeguarding training undertaken by all staff and tutors.

Any member of staff or tutor affected by issues arising from concerns for children's welfare or safety can seek support from the DSL.

Enjoy Education will provide appropriate training and support to ensure that all staff and tutors are competent to carry out their responsibilities for safeguarding and promoting the welfare of children.

### **Code of Conduct for Staff and Tutors**

Staff and tutors should always prioritize the welfare of children. They should report all concerns about abusive behaviour (including behaviour being displayed by an adult or child and directed at anybody of any age) to the DSL.

Staff and tutors must treat children fairly and without prejudice or discrimination.

They should promote relationships based on openness, honesty, trust, and respect.

Staff and tutors should exercise caution when discussing sensitive issues with children.

If a member of staff or tutor is alone with a child, they should ensure they are within sight or hearing of another adult. Where possible, they should leave the door open.

Tuition should be conducted in the student's home or a public space appropriate for learning (e.g., a public library). If this is not possible, alternative arrangements should be discussed with the Enjoy Education Client Manager.

When working with children, tutors and staff must not smoke, consume alcohol or illegal substances, take unnecessary risks, or put the child's safety at risk.

Tutors and staff must not develop inappropriate relationships with children. They should ensure their behaviour cannot be questioned and that they maintain professional boundaries.

Tutors and staff must not let children have their personal contact details (mobile number, email, or postal address) and must not have contact with them via a personal social media account.

Staff and tutors should not offer lifts in their car to Enjoy Education students.

Tutors and staff must only take photos of a student if the student and parents/guardians are happy for them to do so. They must only publish images of pupils where they and their parents have given explicit written consent.

Tutors and staff must not promise to keep secrets for children.

Tutors and staff must not engage in behaviour that is abusive, including having any form of sexual contact with the child.

If a tutor or member of staff behaves inappropriately, Enjoy Education will review their suitability to work around children and, depending on the seriousness of the situation, may also make a report to statutory agencies such as the police and/or local authority child protection services.

### **Low-Level Concerns About Members of Staff and Tutors**

Enjoy Education is committed to creating and maintaining a culture of openness, trust, and transparency in which concerns about the conduct of adults working with children are shared and addressed promptly.

A low-level concern is any concern, no matter how small, that an adult working with or on behalf of Enjoy Education may have acted in a way that:

Is inconsistent with the Enjoy Education Staff and Tutor Code of Conduct;

Does not meet the threshold of harm for referral to the Local Authority Designated Officer (LADO);

May have caused a sense of unease, concern, or doubt about professional conduct; or

Could indicate a pattern of behaviour that may require further consideration.

Examples of low-level concerns may include, but are not limited to:

- Being overly familiar with a child;
- Communicating with a child through unauthorised channels;
- Failing to maintain appropriate professional boundaries;
- Using inappropriate language or humour;
- Meeting a student in circumstances that have not been agreed with parents and Enjoy Education;
- Breaches of online safety expectations during online tuition;
- Any conduct that could be perceived as unprofessional, even if not intended to cause harm.

All staff and tutors should feel empowered to share low-level concerns. Concerns should be reported to the Designated Safeguarding Lead (DSL) as soon as reasonably possible. Where the concern relates to the DSL, it should be reported directly to the CEO or, where appropriate, to the Local Authority Designated Officer (LADO).

The DSL will consider whether the concern meets the threshold for managing allegations against adults. If the concern does not meet that threshold, it will be recorded as a low-level concern and managed appropriately.

Records of low-level concerns will be maintained securely and confidentially. The DSL will review concerns to identify any emerging patterns of behaviour that may indicate a risk to children or require additional support, guidance, training, supervision, or formal action.

Enjoy Education recognises that self-reporting can be an important indicator of professional integrity. Staff and tutors are encouraged to report any incident where they believe their behaviour may have fallen below expected standards, even where no complaint has been made.

Low-level concerns will be handled fairly and proportionately, ensuring that both the welfare of children and the rights of staff and tutors are appropriately protected.

### **Physical Contact and Care**

Tutors and staff should be aware that even well-intentioned physical contact may be misconstrued by the pupil or an observer. There may be occasions when it is appropriate to have physical contact with a child, but it is crucial that any physical contact is in response to the child's needs at the time and is appropriate to their age, stage of development, gender, ethnicity, and background. Staff and tutors should use their professional judgment at all times. Extra caution may be required where it is known that a child has suffered previous abuse or neglect.

Tutors and staff should not use any form of degrading or humiliating treatment (e.g., sarcasm, demeaning, or insensitive comments) to punish a child.

Tutors and staff should not use physical intervention as a form of punishment.

Tutors and staff will not be accused of inflicting corporal punishment if the action was taken for reasons that include averting an immediate danger of personal injury to or an immediate danger of death of any person, including the child.

Tutors and staff should always seek to defuse situations and avoid the use of physical intervention wherever possible. Where physical intervention is necessary, they should use the minimum force and for the shortest time needed.

In all cases where physical intervention has taken place, tutors and staff are encouraged to record the incident and report it to the DSL and the child's parents using the incident and concern form.

Where it can be anticipated that physical intervention is likely to be required, Enjoy Education will help the tutor or member of staff to put in place a plan that the student and parents are aware of and agree to.

Tutors and staff should only provide personal care in an emergency, and they should ensure there is more than one adult present if possible. An exception to this is if it has been agreed that the provision of personal care is part of their role and they have been trained to do this safely.

Tutors and staff should not administer medication to a child unless this has been agreed by the family and they have been trained to do this safely.

### **Allegations Against Members of Staff and Tutors**

Detailed guidance on handling allegations of abuse made against staff members and tutors can be found in Part Four of Keeping Children Safe in Education 2025.

Enjoy Education recognizes that it is possible for staff and tutors to behave in a way that might cause harm to children and takes seriously any allegation received. If a member of staff or tutor has a concern about another adult, including someone who works at Enjoy Education, they should report it immediately to the DSL or a deputy DSL in their absence.

In cases of allegations made against members of staff or tutors, the DSL should review the information available and consider whether the case meets the threshold of harm/risk of harm.

If it meets the threshold of harm/risk of harm and is an allegation, the procedures below should be followed, and the LADO should be notified within one working day. If appropriate, the police should also be notified within one working day or immediately if necessary.

If the incident does not meet the threshold of harm/risk of harm and is a concern only, steps should be taken to ensure any conduct or behaviour issues are addressed with the member of staff or tutor through normal company procedures. The decision and justification should be recorded by the DSL and safeguarding committee.

If the DSL is unclear whether the incident meets the threshold of harm/risk of harm, they may seek advice from the LADO.

A clear and comprehensive summary of allegations and details of the subsequent actions taken should be kept on the confidential file of the accused. Details of allegations against staff or tutors that are found to have been malicious should be removed from records.

The DSL should inform the accused person about the allegation as soon as possible after consulting the safeguarding committee (and if necessary, relevant authorities). The DSL should provide the accused person with as much information as possible at that time. However, where a strategy discussion is needed or police or children's social care services need to be involved, the DSL should not do that until those agencies have been consulted. Enjoy Education must consider carefully whether the circumstances of a case warrant a person being suspended from contact with Enjoy Education students or whether alternative arrangements can be put in place until the allegation or concern is resolved. All options to avoid suspension should be considered before taking that step.

When an allegation is made, Enjoy Education will ensure that every effort is made to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

In the event of concerns or allegations about the DSL, CEO, or Enjoy Education's handling of safeguarding concerns, allegations should be reported directly to the LADO. Contacts for London Local authorities can also be found on the London Safeguarding Children Board website.

### **Whistleblowing**

All staff and tutors should feel able to raise concerns about poor or unsafe practice, and such concerns will always be taken seriously by the Safeguarding Committee.

In the event of concerns or allegations about the DSL or Enjoy Education's handling of safeguarding concerns, allegations should be reported directly to the LADO. The same applies when there are concerns or allegations about the CEO.

All members of staff and tutors should be aware that it is a disciplinary offense not to report concerns about the conduct of a colleague that could place a child at risk. Staff and tutors can access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

### **Points of Contact**

As Enjoy Education works across boroughs in London and with students in multiple locations, local points of contact cannot be listed in this policy. In order to find the relevant local authority or point of contact, reference should be made to the online tool for finding relevant contact details: Report Child Abuse to Your Local Council

### **Support for Staff and Tutors:**

- Education Support Partnership: [www.educationsupportpartnership.org.uk](http://www.educationsupportpartnership.org.uk)
- Professional Online Safety Helpline: [www.saferinternet.org.uk/helpline](http://www.saferinternet.org.uk/helpline)

### **Support for Students:**

- NSPCC: [www.nspcc.org.uk](http://www.nspcc.org.uk)
- ChildLine: [www.childline.org.uk](http://www.childline.org.uk)
- Papyrus: [www.papyrus-uk.org](http://www.papyrus-uk.org)
- Young Minds: [www.youngminds.org.uk](http://www.youngminds.org.uk)

- The Mix: [www.themix.org.uk](http://www.themix.org.uk)

#### **Support for Adults:**

- Family Lives: [www.familylives.org.uk](http://www.familylives.org.uk)
- Crime Stoppers: [www.crimestoppers-uk.org](http://www.crimestoppers-uk.org)
- Victim Support: [www.victimsupport.org.uk](http://www.victimsupport.org.uk)
- Kidscape: [www.kidscape.org.uk](http://www.kidscape.org.uk)
- The Samaritans: [www.samaritans.org](http://www.samaritans.org)
- Mind: [www.mind.org.uk](http://www.mind.org.uk)
- National Association for People Abused in Childhood (NAPAC): [napac.org.uk](http://napac.org.uk)
- Mothers of Sexually Abused Children (MOSAC): [www.mosac.org.uk](http://www.mosac.org.uk)
- Action Fraud: [www.actionfraud.police.uk](http://www.actionfraud.police.uk)

#### **Support for Learning Disabilities:**

- Respond: [www.respond.org.uk](http://www.respond.org.uk)
- Mencap: [www.mencap.org.uk](http://www.mencap.org.uk)

#### **Domestic Abuse:**

- Refuge: [www.refuge.org.uk](http://www.refuge.org.uk)
- Women's Aid: [www.womensaid.org.uk](http://www.womensaid.org.uk)
- Men's Advice Line: [www.mensadvice.org.uk](http://www.mensadvice.org.uk)
- Mankind: [www.mankindcounselling.org.uk](http://www.mankindcounselling.org.uk)
- Domestic Abuse Services: [www.domesticabuseservices.org.uk](http://www.domesticabuseservices.org.uk)

#### **Honour-Based Violence:**

- Forced Marriage Unit: <https://www.gov.uk/guidance/forced-marriage>

#### **Sexual Abuse and CSE:**

- Lucy Faithfull Foundation: [www.lucyfaithfull.org.uk](http://www.lucyfaithfull.org.uk)
- Stop it Now!: [www.stopitnow.org.uk](http://www.stopitnow.org.uk)
- Parents Protect: [www.parentsprotect.co.uk](http://www.parentsprotect.co.uk)
- Child Exploitation and Online Protection (CEOP): [www.ceop.police.uk](http://www.ceop.police.uk)
- Marie Collins Foundation: [www.mariecollinsfoundation.org.uk](http://www.mariecollinsfoundation.org.uk)
- Internet Watch Foundation (IWF): [www.iwf.org.uk](http://www.iwf.org.uk)

#### **Online Safety:**

- Childnet International: [www.childnet.com](http://www.childnet.com)
- UK Safer Internet Centre: [www.saferinternet.org.uk](http://www.saferinternet.org.uk)
- Parents Info: [www.parentinfo.org](http://www.parentinfo.org)
- Internet Matters: [www.internetmatters.org](http://www.internetmatters.org)
- Net Aware: [www.net-aware.org.uk](http://www.net-aware.org.uk)
- ParentPort: [www.parentport.org.uk](http://www.parentport.org.uk)
- Get Safe Online: [www.getsafeonline.org](http://www.getsafeonline.org)

#### **Radicalisation and Hate:**

- Educate Against Hate: [www.educateagainsthate.com](http://www.educateagainsthate.com)
- Counter Terrorism Internet Referral Unit: [www.gov.uk/report-terrorism](http://www.gov.uk/report-terrorism)
- True Vision: [www.report-it.org.uk](http://www.report-it.org.uk)

## Appendix 1: Definitions and Indicators

### Definitions of Significant Harm and the Four Types of Abuse

Child protection is part of the safeguarding agenda that focuses on preventing maltreatment and protecting children at risk of neglect or abuse. Under the Children Act 1989, Safeguarding and Social Care have a legal duty to investigate and take action to protect children where there are concerns that they are at risk of suffering significant harm, which is defined as:

- **Neglect:** Failure to provide basic care to meet the child's physical needs, such as not providing adequate food, clothing, or shelter; failure to protect the child from harm or ensure access to medical care and treatment.
- **Physical Abuse:** Causing physical harm or injury to a child.
- **Sexual Abuse:** Involving children in sexual activity or forcing them to witness sexual activity, which includes involving children in looking at or producing pornography.
- **Emotional Abuse:** Failure to provide love and warmth that affects the child's emotional development; psychological ill-treatment of a child through bullying, intimidation, or threats.

### Possible Indicators of Abuse and Neglect

- Inadequate or inappropriate clothing.
- Appears underweight, unwell, and constantly hungry.
- Failure to thrive physically and appears tired and listless.
- Dirty or unhygienic appearance.
- Frequent unexplained absences from school.
- Lack of parental supervision.

### Physical Abuse

- Any injury such as bruising, bite marks, burns, or fractures where the explanation given is inconsistent with the injury.
- Injuries in unexpected places or not typical of normal childhood injuries or accidents.
- High frequency of injuries.
- Parents seem unconcerned or fail to seek adequate medical treatment.

### Sexual Abuse

- Sexual knowledge or behaviour that is unusually explicit or inappropriate for the child's age/stage of development.
- Sexual risk-taking behaviour, including involvement in sexual exploitation/older boyfriend or girlfriend.
- Continual inappropriate or excessive masturbation.
- Physical symptoms such as injuries to the genital or anal area, bruising, sexually transmitted infections, or pregnancy.
- Unwillingness to undress for sports.

### Emotional Abuse

- Developmental delay.
- Attachment difficulties with parents and others.
- Withdrawal and low self-esteem.

### Indirect Indicators of Abuse and Neglect

- Sudden changes in behaviour.
- Withdrawal and low self-esteem.
- Eating disorders.
- Aggressive behaviour towards others.
- Sudden unexplained absences from school.
- Drug/alcohol misuse.
- Running away/going missing.

### Parental Attributes

- Misusing drugs and/or alcohol.

- Physical/mental health or learning difficulties.
- Domestic violence.
- Avoiding contact with school and other professionals.

## **Definitions, Signs, and Symptoms of Other Safeguarding Issues**

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

CSE is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate, or deceive a child or young person under 18 into sexual activity (a) in exchange for something the victim needs or wants and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology.

### **Signs and Symptoms of CSE**

- Appearing with unexplained gifts or new possessions.
- Associating with other young people involved in exploitation.
- Having older boyfriends or girlfriends.
- Contracting sexually transmitted infections or becoming pregnant.
- Displaying mood swings or changes in emotional well-being.
- Misusing drugs and alcohol.
- Receiving odd calls and messages from outside their normal social network.
- Being secretive about who they are talking to and where they are going.
- Going missing for periods or regularly coming home late.
- Regularly missing school or education or not having any education at all.

### **Criminal Exploitation of Children and County Lines**

Child Criminal Exploitation is common in county lines and occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate, or deceive a child or young person under 18. The victim may have been criminally exploited even if the activity appears consensual. Child Criminal Exploitation does not always involve physical contact; it can also occur through the use of technology.

**County Lines** is a term used to describe gangs and organized criminal networks involved in exporting illegal drugs into one or more importing areas within the UK using dedicated mobile phone lines or other forms of “deal line”. They are likely to exploit children and vulnerable adults to move and store the drugs and money and use coercion, intimidation, violence (including sexual violence), and weapons.

### **Signs and Symptoms of Child Criminal Exploitation**

- Frequently absent from and doing badly in school.
- Going missing from home, staying out late, and traveling for unexplained reasons.
- In a relationship or hanging out with someone older than them.
- Being angry, aggressive, or violent.
- Being isolated or withdrawn.
- Having unexplained money and buying new things.
- Wearing clothes or accessories in gang colors or getting tattoos.
- Using new slang words.
- Spending more time on social media and being secretive about time online.
- Making more calls or sending more texts, possibly on a new phone or phones.
- Self-harming and feeling emotionally unwell.
- Taking drugs and abusing alcohol.
- Committing petty crimes like shoplifting or vandalism.
- Unexplained injuries and refusing to seek medical help.
- Carrying weapons or having a dangerous breed of dog.

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

Children missing education are children of compulsory school age who are not registered pupils at a school and are not receiving suitable education otherwise than at a school. Children missing education are at significant risk of underachieving, being victims of harm, exploitation, or radicalization, and becoming NEET (not in education, employment, or training) later in life.

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

Children can abuse other children. This is generally referred to as Child-on-Child abuse and can take many forms, including (but not limited to) bullying (including cyberbullying), sexual violence and sexual harassment, physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm, sexting, and initiation/hazing type violence and rituals.

### **Private Fostering**

Private fostering occurs when a child under 16 (under 18 if disabled) is provided with care and accommodation by someone who is not a parent, person with parental responsibility, or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer.

### **Honour-Based Violence (HBV)**

Honour-based violence encompasses incidents or crimes committed to protect or defend the honor of the family and/or community. Forced marriage, female genital mutilation, and practices such as breast ironing are considered types of honour-based violence.

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

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

#### **Signs and Symptoms that a Child May Be at Risk of FGM**

- Knowing that a mother or older sibling has undergone FGM.
- A girl talks about plans to have a 'special procedure' or attend a special occasion/celebration to 'become a woman'.
- A girl's parents state that they or a relative will take the child out of the country for a prolonged period or school holidays or when attending for travel vaccinations.
- A girl talks about a long holiday to her country of origin or another country where the practice is present.
- The girl is a member of a community that is less integrated into UK society and whose country of origin practices FGM.

#### **Signs and Symptoms that a Child May Have Already Undergone FGM**

- Difficulty walking, sitting, or standing.
- Spending longer than normal in the bathroom or toilet due to difficulties urinating.
- Soreness, infection, or unusual presentation noticed by a practitioner when changing a nappy or helping with toileting.
- Spending long periods away from the classroom during the day with bladder or menstrual problems.
- Having frequent unusual menstrual problems.
- Prolonged or repeated absence from school or college.
- A prolonged absence from school or college with personal or behaviour changes, e.g., withdrawn, depressed.
- Being particularly reluctant to undergo normal medical examinations.
- Asking for help or advice but not being explicit about the procedure due to embarrassment or fear.

**Forced Marriage**

A forced marriage is one where one or both spouses do not (or, in the case of some adults with learning or physical disabilities or mental incapacity, cannot) consent to the marriage, and violence, threats, or other forms of coercion are involved. Coercion may include emotional force, physical force, or the threat of physical force and financial pressure.

**Contact Information**

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