

# Safeguarding Policy

E Safety Training Limited

<b>Policy owner</b>	Safeguarding Lead / Director
<b>Applies to</b>	Employees, directors, consultants, contractors, subcontractors, delivery partners and all commissioned activity
<b>People protected by this policy</b>	Children and young people, adults at risk, school staff, parents/carers, employees, subcontractors and partner professionals
<b>Review frequency</b>	Annually, or sooner following statutory changes, safeguarding learning, incidents or commissioner requirements
<b>Version</b>	v1.7 (Updated 2026)

## 1. Policy Statement

E Safety Training Limited is committed to safeguarding and promoting the welfare of children, young people, adults at risk, school staff, employees, subcontractors and all individuals who engage with our services.

Safeguarding is at the centre of our work. We recognise that the children and young people we support may include those with special educational needs and disabilities, communication differences, social, emotional and mental health needs, neurodivergence, trauma histories, care experience, or other vulnerabilities that may increase their risk of harm online or offline.

We also recognise that safeguarding is not limited to children. Our duty of care extends to our own employees, subcontractors, school staff, parents, carers and partner professionals who may be affected by safeguarding concerns, allegations, unsafe working practices, harassment, abuse, discrimination, online harm, vicarious trauma, or inappropriate conduct.

This policy sets out how we prevent harm, identify concerns, respond to disclosures, manage allegations, escalate risk, share information lawfully and support a safe working culture.

## 2. Scope of the Policy

This policy applies to:

- all employees, directors, consultants, trainers, contractors, volunteers and subcontractors working on behalf of E Safety Training Limited;
- all children and young people who engage with our programmes, training, resources, digital tools or commissioned services;
- school staff, carers, parents and professionals who participate in training, consultancy, events or programme delivery;
- any work delivered face to face, online, by telephone, by email, through digital platforms, or through written materials;
- all commissioned, contracted or partnership activity, including work delivered in schools, alternative provision, special schools, residential settings, local authorities, charities, community venues and online environments.

## 3. Legal and Statutory Framework

This policy is informed by, and should be read alongside, the following legislation and guidance:

- Children Act 1989 and Children Act 2004
- Education Act 2002
- Keeping Children Safe in Education 2025
- Working Together to Safeguard Children 2026
- Safeguarding Vulnerable Groups Act 2006
- Equality Act 2010
- Human Rights Act 1998
- Data Protection Act 2018 and UK GDPR
- Protection from Harassment Act 1997
- Health and Safety at Work etc. Act 1974
- Ofsted Education Inspection Framework and safeguarding expectations
- relevant local safeguarding partnership procedures

Keeping Children Safe in Education confirms that safeguarding and promoting the welfare of children is everyone's responsibility, and that all staff working with children should understand their safeguarding responsibilities. Working Together to Safeguard Children sets out expectations for multi-agency working to help, protect and promote the welfare of children.

## 4. Definitions

For the purposes of this policy, safeguarding means:

- protecting children and adults at risk from maltreatment;
- preventing impairment of health, development or wellbeing;
- ensuring children and young people grow up in circumstances consistent with safe and effective care;
- taking action to enable all children, young people and adults at risk to have the best outcomes;
- protecting employees, subcontractors and partner professionals from foreseeable harm, unsafe practice, harassment, abuse, intimidation, discrimination or unmanaged safeguarding risk.

Child protection is part of safeguarding and refers to activity undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

## 5. Principles

Our safeguarding approach is based on the following principles:

- safeguarding is everyone's responsibility;
- the welfare of the child is paramount;
- children, young people and adults should be listened to and taken seriously;
- safeguarding decisions should be timely, proportionate, recorded and accountable;
- concerns should be shared with the right people, not kept within informal channels;
- information should be shared lawfully, fairly and only where necessary;
- staff and subcontractors should never be left to manage safeguarding risk alone;
- professional curiosity should be encouraged;
- safer working practice protects children, schools, employees and the organisation;
- online harm must be treated with the same seriousness as offline harm.

## 6. Safeguarding Lead Responsibility

E Safety Training Limited will appoint a named Safeguarding Lead who has responsibility for overseeing safeguarding practice across the organisation.

The Safeguarding Lead is responsible for:

- ensuring this policy is implemented and reviewed;
- advising staff and subcontractors on safeguarding concerns;
- ensuring concerns are recorded accurately and securely;
- making decisions about escalation to schools, local authority children's social care, police, the Local Authority Designated Officer, or other relevant agencies;
- maintaining oversight of safeguarding themes across programmes;
- ensuring safeguarding learning is used to improve services;
- ensuring that safeguarding considerations are built into programme design, delivery, communications, digital content and data handling.

Where the Safeguarding Lead is unavailable and there is an immediate concern about a child or adult's safety, staff must not wait. They must contact the relevant school Designated Safeguarding Lead, children's social care, adult safeguarding services, police, or emergency services as appropriate.

## 7. Safeguarding Children and Young People

We recognise that children and young people may be at risk of harm through:

- abuse or neglect;
- child sexual abuse or exploitation;
- criminal exploitation;
- grooming;
- radicalisation;
- bullying and child-on-child abuse;
- harmful sexual behaviour;
- domestic abuse;

- self-harm or suicidal ideation;
- online abuse, coercion, harassment or blackmail;
- sharing or creation of nude or semi-nude images;
- AI-generated or digitally manipulated abuse;
- misinformation, harmful content or extremist content;
- financial exploitation or scams;
- contact from unsafe adults;
- inappropriate use of social media, gaming, livestreaming or messaging platforms.

We understand that some children and young people, particularly those with SEND, may experience additional barriers to recognising risk, reporting harm, being believed, communicating what has happened, or understanding consent, privacy and boundaries.

Staff must remain alert to verbal and non-verbal indicators of harm, including changes in behaviour, distress, withdrawal, sexualised behaviour, fearfulness, unexplained gifts, secrecy around devices, fixation on an online contact, or signs that a child is being pressured, threatened or controlled.

## 8. Safeguarding School Staff and Partner Professionals

We recognise that school staff and partner professionals may also be affected by safeguarding issues, including:

- receiving disclosures from children or families;
- being subject to allegations or complaints;
- being exposed to distressing content;
- experiencing harassment, threats or abuse from pupils, parents, carers or members of the public;
- being targeted through online abuse, impersonation, doxxing or malicious reporting;
- being pressured to share information inappropriately;
- experiencing uncertainty about safeguarding thresholds or escalation routes.

Our staff will treat school staff and partner professionals with respect and will support clear, safe and proportionate decision-making. We will not ask school staff to act outside their safeguarding duties, disclose information unlawfully, or manage risk without appropriate escalation.

Where a concern relates to the conduct of a member of school staff, our staff will follow the school's safeguarding and allegations procedures, and where necessary ensure the concern is escalated to the headteacher, chair of governors, trust safeguarding lead, Local Authority Designated Officer, or appropriate statutory agency.

## 9. Safeguarding Employees, Contractors and Subcontractors

E Safety Training Limited has a duty of care to its own employees, consultants, trainers and subcontractors.

We will take reasonable steps to protect staff from:

- lone working risks;
- unsafe delivery environments;
- harassment, bullying, discrimination or intimidation;
- exposure to distressing safeguarding material without support;
- pressure to make safeguarding decisions outside their role or competence;
- retaliation after raising concerns;
- unsafe online communication with children, families or professionals;
- reputational harm caused by unclear boundaries or unmanaged allegations.

Employees and subcontractors must also follow safe working practice. They must not:

- work alone with a child unless this has been risk assessed and agreed;
- contact children through personal accounts, personal phones or personal social media;
- accept friend requests from children or young people;
- share personal contact details with children;
- take images or recordings of children without explicit written permission and a clear lawful purpose;

- transport children or young people unless this has been formally agreed, risk assessed and authorised;
- promise confidentiality where a safeguarding concern may need to be shared;
- investigate allegations themselves;
- destroy, edit or forward safeguarding evidence unless instructed by the Safeguarding Lead or statutory agency.

## 10. Safer Recruitment and Suitability

We will ensure that staff, contractors and subcontractors are suitable for the work they undertake.

Depending on the role and level of contact with children or vulnerable groups, safer recruitment checks may include:

- identity checks;
- right to work checks;
- references;
- qualification checks where relevant;
- DBS checks at the appropriate level;
- barred list checks where legally applicable;
- interview questions exploring safeguarding knowledge, values and boundaries;
- confirmation that subcontractors have appropriate safeguarding arrangements in place.

Safer recruitment is an ongoing process and is a key part of creating a safe environment for children and young people.

## 11. Training and Induction

All employees, contractors and subcontractors will receive safeguarding information appropriate to their role.

This may include:

- the organisation's safeguarding policy;
- the code of conduct;
- how to report concerns;
- recognising signs of abuse, neglect and exploitation;
- online harms and digital safeguarding;
- SEND-specific safeguarding considerations;
- information-sharing expectations;
- whistleblowing procedures;
- managing disclosures;
- allegations against adults;
- safe working practice.

Staff delivering training or consultancy in schools must understand that they are visitors to the school but still have an active safeguarding responsibility. They must follow both this policy and the host setting's safeguarding procedures.

## 12. Responding to Safeguarding Concerns

Where a safeguarding concern arises, staff must:

- listen carefully and remain calm;
- take the concern seriously;
- reassure the person that they have done the right thing by telling someone;
- avoid asking leading questions;
- avoid promising confidentiality;
- explain that information may need to be shared to keep someone safe;
- record the concern as soon as possible using the person's own words where relevant;
- report the concern to the Safeguarding Lead and/or the setting's Designated Safeguarding Lead;
- escalate immediately if there is a risk of significant harm or immediate danger.

Where there is immediate risk of harm, staff must contact emergency services on 999.

### 13. Concerns Arising During School-Based Delivery

When working in a school or education setting, our staff will follow the host setting's safeguarding procedures.

If a child makes a disclosure, appears distressed, shares concerning information, or there is a concern about risk, our staff will report this immediately to the school's Designated Safeguarding Lead or deputy.

Our staff will also notify the E Safety Training Limited Safeguarding Lead so that an organisational record can be maintained.

Where the concern relates to the conduct of the school's Designated Safeguarding Lead, the concern will be escalated to the headteacher, trust safeguarding lead, chair of governors, proprietor, Local Authority Designated Officer or statutory agency as appropriate.

### 14. Online Safeguarding and Digital Risk

Because our work focuses on online safety, we recognise that digital safeguarding is a core part of our responsibility.

This includes risks associated with:

- social media;
- gaming;
- livestreaming;
- messaging apps;
- anonymous reporting tools;
- image sharing;
- sexual extortion;
- cyberbullying;
- harmful content;
- AI-generated abuse;
- impersonation;
- grooming;
- scams;
- radicalisation;
- data misuse;
- unsafe online communities.

Where digital evidence is involved, staff must not investigate beyond what is necessary to understand and report the concern. They must not ask a child to forward illegal or harmful content. Where nude or semi-nude images of children may be involved, staff must follow safeguarding procedures and seek advice from the Designated Safeguarding Lead, police or relevant statutory guidance.

### 15. Information Sharing and Data Protection

We recognise that effective safeguarding may require appropriate information sharing. We will share information where it is necessary, proportionate, relevant, adequate, accurate, timely and secure.

Safeguarding information will be shared only with those who need to know, which may include:

- the school Designated Safeguarding Lead;
- local authority children's social care;
- adult safeguarding services;
- the police;
- the Local Authority Designated Officer;
- commissioners;
- safeguarding partners;
- regulatory or inspection bodies where required.

Data protection law does not prevent the sharing of information where it is necessary to safeguard a child or adult at risk. However, information must be handled carefully and recorded clearly.

Requests for information about children, young people, school staff, employees or reporting parties will be reviewed by the Safeguarding Lead or a senior authorised person before disclosure, unless there is an immediate risk requiring urgent statutory escalation.

## **16. Anonymous Reports, Disclosures and Platform-Based Concerns**

Where safeguarding concerns are received through anonymous reporting tools, online platforms, school systems or digital products, we will apply a clear decision-making process.

Before sharing identifying information, staff must consider:

- the nature and seriousness of the concern;
- whether there is an immediate risk of harm;
- the age and vulnerability of the child or young person;
- the lawful basis for sharing information;
- the expectations of the reporting tool or service;
- whether disclosure could increase risk to the reporting person;
- whether the school Designated Safeguarding Lead or statutory agency needs the information to protect a child;
- whether the Safeguarding Lead has authorised the disclosure.

No employee should make a safeguarding disclosure decision alone where there is time to consult the Safeguarding Lead. If there is immediate danger, the need to protect life and prevent significant harm takes priority.

## **17. Allegations Against Employees, Contractors, Subcontractors or School Staff**

Any allegation that an adult has harmed, may have harmed, or poses a risk of harm to a child must be taken seriously.

This includes allegations that an adult has:

- behaved in a way that has harmed a child or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child in a way that indicates they may pose a risk of harm;
- behaved in a way that indicates they may not be suitable to work with children.

Concerns about E Safety Training Limited staff, contractors or subcontractors must be reported immediately to the Safeguarding Lead or Director. Where appropriate, the concern will be referred to the Local Authority Designated Officer, police, children's social care, DBS or other relevant body.

Concerns about school staff must be referred through the school's allegations procedure, usually to the headteacher or principal. Where the allegation concerns the headteacher, it should be referred to the chair of governors, trust lead, proprietor or Local Authority Designated Officer.

## **18. Low-Level Concerns**

We will maintain a culture where staff are expected to report low-level concerns, even where the behaviour does not meet the threshold for referral to the Local Authority Designated Officer.

A low-level concern may include:

- over-familiarity with a child;
- inappropriate language;
- unnecessary one-to-one contact;
- use of personal devices or accounts;
- boundary breaches;
- dismissive attitudes towards safeguarding;
- conduct that feels uncomfortable or inconsistent with professional standards.

Low-level concerns will be recorded and reviewed to identify patterns, training needs or potential escalation.

## 19. Whistleblowing

All employees, contractors, subcontractors and partners have the right and responsibility to raise concerns about unsafe practice.

Concerns may relate to:

- poor safeguarding practice;
- failure to act on concerns;
- inappropriate information sharing;
- unsafe conduct by adults;
- bullying, harassment or discrimination;
- pressure to ignore risk;
- attempts to conceal incidents;
- organisational decisions that may place children, adults or staff at risk.

No person will be treated unfairly for raising a genuine safeguarding concern in good faith.

## 20. Equality, Inclusion and Additional Vulnerability

We recognise that children, young people and adults may face additional barriers to safety because of disability, communication needs, race, religion, sex, sexual orientation, gender identity, poverty, care experience, language, culture, trauma, neurodivergence or previous abuse.

We will make reasonable adjustments to ensure that safeguarding messages, reporting routes and support are accessible.

For children and young people with SEND, this may include:

- visual resources;
- simplified language;
- additional processing time;
- communication aids;
- trusted adult support;
- concrete examples;
- repetition and reinforcement;
- trauma-informed delivery;
- avoiding assumptions about capacity, behaviour or credibility.

We will not allow a child's disability, behaviour, communication style or diagnosis to mask possible abuse or reduce professional curiosity.

## 21. Record Keeping

Safeguarding records will be:

- factual;
- dated and timed;
- written as soon as possible;
- clear about what was seen, heard, reported and done;
- clear about who was informed;
- clear about decisions made and the rationale for those decisions;
- stored securely;
- shared only with appropriate people.

Records will distinguish between fact, professional judgement and third-party information.

## 22. Subcontractors and Delivery Partners

Where subcontractors or delivery partners are used, E Safety Training Limited will ensure that safeguarding expectations are clear before delivery begins.

Subcontractors may be required to provide evidence of:

- safeguarding policy;
- safer recruitment checks;
- DBS arrangements where relevant;
- safeguarding training;
- insurance;
- reporting procedures;
- code of conduct;
- data protection compliance;
- agreement to follow E Safety Training Limited safeguarding procedures.

Where a subcontractor is delivering on behalf of E Safety Training Limited, safeguarding concerns must be reported to both the host setting and E Safety Training Limited Safeguarding Lead.

## 23. Safe Training and Consultancy Practice

When delivering training, assemblies, workshops, audits or consultancy, staff must:

- clarify safeguarding reporting routes at the start of delivery;
- avoid encouraging personal disclosures in open group settings;
- respond safely if disclosures arise;
- use age-appropriate and needs-appropriate content;
- avoid unnecessarily graphic or distressing material;
- consider the needs of SEND learners;
- manage discussions about online harm carefully;
- ensure staff are present where required by the setting;
- avoid being left alone with children unless formally agreed and risk assessed;
- ensure online sessions are secure and professionally managed.

## 24. Images, Recordings and Media

Images, videos, screenshots or recordings of children, young people, school staff or employees must only be taken or used where there is a clear lawful purpose, appropriate consent and safeguarding consideration.

We will not use identifiable images of children or young people in public materials without appropriate permission.

We will consider the risks of online publication, including misuse, unauthorised sharing, AI manipulation, identification and reputational harm.

Staff must not use personal devices to take or store images of children unless there is an agreed emergency or exceptional reason, and the image is transferred and deleted in line with organisational procedure.

## 25. Health, Safety and Wellbeing

Safeguarding includes protecting staff wellbeing.

The organisation will consider:

- lone working arrangements;
- safe travel;
- emotionally distressing work;
- exposure to harmful content;
- challenging school or family situations;
- online harassment;
- workload pressures linked to safeguarding concerns;

- access to supervision, debriefing or senior support.

Staff should report any situation where they feel unsafe, pressured, threatened or unable to manage risk.

## 26. Escalation and Professional Disagreement

If a staff member believes that a safeguarding concern has not been acted on appropriately, they must escalate the concern.

Escalation may include:

- raising the concern again with the school Designated Safeguarding Lead;
- contacting the headteacher or senior leader;
- contacting the local authority safeguarding team;
- contacting children's social care;
- contacting the police;
- contacting the Local Authority Designated Officer;
- using local safeguarding partnership escalation procedures.

Staff must not assume that someone else has acted unless this has been confirmed.

## 27. Monitoring, Review and Continuous Improvement

This policy will be reviewed at least annually, or sooner where there are changes in legislation, statutory guidance, commissioning requirements, organisational structure, safeguarding learning or serious incidents.

Safeguarding themes, incidents and near misses will be reviewed to improve:

- staff training;
- programme content;
- reporting routes;
- information-sharing procedures;
- risk assessment;
- safer recruitment;
- subcontractor management;
- digital safeguarding practice.

## 28. Commitment

E Safety Training Limited is committed to maintaining a culture where safeguarding is visible, understood and acted upon. We will work in partnership with schools, families, commissioners, statutory agencies and safeguarding partners to protect children and young people, support staff, and ensure that all services are delivered safely, ethically and professionally.

## References

Keeping Children Safe in Education 2025, Department for Education.

Working Together to Safeguard Children 2026, HM Government.

NSPCC Learning: Safer recruitment and managing allegations of abuse against staff and volunteers.